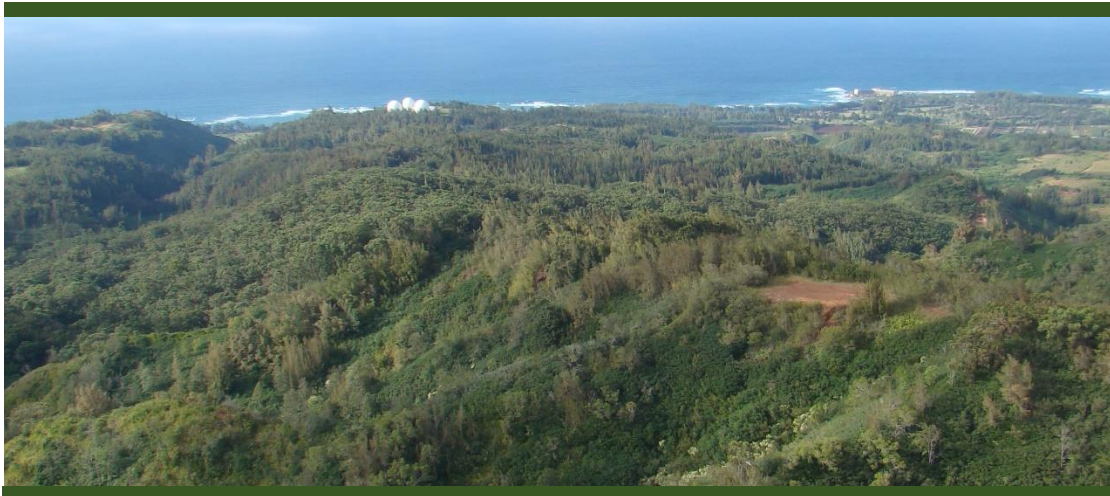


**ARMY TRAINING LAND RETENTION  
OF STATE LANDS AT KAHUKU TRAINING AREA,  
KAWAILOA-POAMOHO TRAINING AREA,  
AND MAKUA MILITARY RESERVATION  
ISLAND OF O'AHU  
FINAL ENVIRONMENTAL IMPACT STATEMENT  
VOLUME II: APPENDICES A-L**



**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 W9128A-19-D-0008

**MAY 2025**

EISX-007-21-001-1733763715

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Cover photograph: Aerial view of Kahuku Training Area (KTA) facing northwest toward the ocean. Upper left corner shows KTA Tract A-1 beyond Pahipahi 'Ālua Gulch.  
Photograph source: U.S. Army.

**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.

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Appendix A

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# **NEPA-HEPA Compliance Guide**

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## Appendix A

# NEPA-HEPA COMPLIANCE GUIDE

Table A-1: NEPA-HEPA Compliance Guide			
NEPA Reference	HEPA Reference	Requirement	Location in FEIS & Notes
<b>Recommended Format/Content Requirements</b>			
40 CFR 1502.10(a)(1), 1502.11; 32 CFR 651.43(a)		Cover	Cover Sheet
40 CFR 1502.10(a)(2), 1502.12; 32 CFR 651.43(b) and Appendix E (b)(2)	HAR 11-200.1-24(d)	Summary	Executive Summary (ES)
40 CFR 1502.10(a)(3); 32 CFR 651.43(c)	HAR 11-200.1-24(e)	Table of contents	Table of Contents
	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.	Figures: <ul style="list-style-type: none"> <li>• Regional maps [Figures 1-1, 3-1, 3-3, 3-5];</li> <li>• Topographic maps [Figures 3-14, 3-16, 3-18];</li> <li>• SLR [Figure 3-20]</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>• Chapter 3 – resource sections</li> </ul>

**Table A-1: NEPA-HEPA Compliance Guide**

NEPA Reference	HEPA Reference	Requirement	Location in FEIS & Notes
	HAR 11-200.1-24(d)(7)	A list of relevant EAs or EISs	<ul style="list-style-type: none"> <li>• Volume II – Appendix F</li> </ul>
NEPA 107(a)(2)(D, E); 40 CFR 1502.24(b); 32 CFR Part 651, Appendix E (b)(2)		The draft environmental impact statement shall list all Federal permits, licenses, and other authorizations that must be obtained in implementing the proposal. If it is uncertain whether a Federal permit, license, or other authorization is necessary, the draft environmental impact statement shall so indicate.	<ul style="list-style-type: none"> <li>• ES.3</li> <li>• Sections 1.4.3 and 1.4.4</li> <li>• Table 1-2: Potential Permits, Licenses, Authorizations, and Approvals</li> </ul>
	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(a)(7), 1502.18; 32 CFR 651.43(h) and Appendix E (b)(7)		List of Preparers	<ul style="list-style-type: none"> <li>• Sections 6.1 and 6.2</li> </ul>
	HAR 11-200.1-24(r)	Disclosure of the identity of the persons, firms, or agency preparing the Draft EIS	
NEPA 102(2)(D); 40 CFR 1506.6(b); 32 CFR 651.39(c), 651.44(b)(3, 4), 651.52(d)		Agencies shall use high-quality information, including reliable data and resources, models, and Indigenous Knowledge. Agencies may rely on existing information as well as information obtained to inform the analysis. Agencies may use any reliable data sources, such as remotely gathered information or statistical models. Agencies shall explain any relevant assumptions or limitations of the information or the particular model or methodology selected for use.	<ul style="list-style-type: none"> <li>• Section 3.1.4 Analysis Methodology</li> <li>• Chapter 3 Methodology and Significance Criteria resource subsections</li> </ul>
NEPA 107(e); 40 CFR 1502.10(a)(7), 1502.19; 32 CFR 651.43(k) and Appendix E (b)(11)		Appendices	<ul style="list-style-type: none"> <li>• Volumes II, III, and IV – Appendices</li> </ul>

**Table A-1: NEPA-HEPA Compliance Guide**

NEPA Reference	HEPA Reference	Requirement	Location in FEIS & Notes
<b>Purpose and Need</b>			
	HAR 11-200.1-24(d)(1)	Brief description of the action	<ul style="list-style-type: none"> <li>• ES.6</li> <li>• Section 1.3.1</li> <li>• Section 2.1</li> </ul>
NEPA 107(d); 40 CFR 1502.10(a)(4), 1502.13; 32 CFR 651.43(d) and Appendix E (b)(4)	HAR 11-200.1-24(f)	Purpose and need for action	<ul style="list-style-type: none"> <li>• ES.5</li> <li>• Sections 1.3.2 and 1.3.3</li> </ul>
	HAR 11-200.1-24(g)(2)	Objectives of the proposed action	<ul style="list-style-type: none"> <li>• Sections 1.3.2 and 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>• Sections 2.1 and 2.4</li> <li>• Sections 3.1.4 and 3.1.5</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>• ES.3 and ES.6</li> <li>• Section 1.1</li> <li>• Section 2.1</li> </ul>
<b>Alternatives</b>			
NEPA 102(2)(C)(iii); 40 CFR 1502.10(a)(5), 1502.14; 32 CFR 651.43(e) and Appendix E (b)(5)	HAR 11-200.1-24(d)(4)	Alternatives considered including the proposed action	<ul style="list-style-type: none"> <li>• ES.8</li> <li>• Section 2.3</li> <li>• Chapter 3 – resource section analyses</li> </ul>

**Table A-1: NEPA-HEPA Compliance Guide**

NEPA Reference	HEPA Reference	Requirement	Location in FEIS & Notes
40 CFR 1502.14; 32 CFR Part 651, Appendix E(b)(5)(ii)		The alternatives section should identify the reasonably foreseeable environmental effects of the proposed action and the alternatives in comparative form based on the information and analysis presented in the sections on the affected environment and the environmental consequences.	<ul style="list-style-type: none"> <li>• ES.8 and ES.9</li> <li>• Section 2.3</li> <li>• Section 3.15</li> </ul>
NEPA 102(2)(C)(iii); 40 CFR 1502.14(a); 32 CFR Part 651, Appendix E (b)(5)(iv)		Rigorously explore and objectively evaluate reasonable alternatives to the proposed action, and, for alternatives that the agency eliminated from detailed study, briefly discuss the reasons for their elimination. The agency need not consider every conceivable alternative to a proposed action; rather, it shall consider a reasonable range of alternatives that will foster informed decision making.	<ul style="list-style-type: none"> <li>• ES.8</li> <li>• Section 2.3</li> </ul>
	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.	
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.	<ul style="list-style-type: none"> <li>• ES.8</li> <li>• Sections 2.1 and 2.3</li> </ul>
NEPA 102(2)(C)(i); 40 CFR 1502.14(b)		Discuss each alternative considered in detail, including the proposed action, so that reviewers may evaluate their comparative merits.	
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.	
40 CFR 1502.14(a); 32 CFR Part 651, Appendix E (b)(5)(i)		Agencies also may include reasonable alternatives not within the jurisdiction of the lead agency (i.e, Army).	<ul style="list-style-type: none"> <li>• ES.8</li> <li>• Section 2.3</li> </ul>

**Table A-1: NEPA-HEPA Compliance Guide**

NEPA Reference	HEPA Reference	Requirement	Location in FEIS & Notes
	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 2.3</li> </ul>
NEPA 102(2)(C)(iii); 40 CFR 1502.14(c); 32 CFR Part 651, Appendix E (b)(5)		Include the no action alternative.	<ul style="list-style-type: none"> <li>ES.8.4</li> <li>Section 2.3.3</li> </ul>
40 CFR 1502.14(d); 32 CFR Part 651, Appendix E (b)(5)		Identify the agency's preferred alternative or alternatives, if one or more exists, in the draft statement and identify such alternative in the final statement unless another law prohibits the expression of such a preference.	<ul style="list-style-type: none"> <li>Section 2.5</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 – resource sections</li> </ul>
NEPA 102(2)(C)(i); 40 CFR 1502.10(a)(6), 1502.15; 32 CFR 651.43(f), and Appendix E (b)(6)		Describe the environment of the area(s) to be affected by the alternatives under consideration, including the reasonably foreseeable environmental trends and planned actions in the area(s).	<ul style="list-style-type: none"> <li>Section 1.2</li> <li>Chapter 3 – resource sections</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 – resource sections</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>

**Table A-1: NEPA-HEPA Compliance Guide**

NEPA Reference	HEPA Reference	Requirement	Location in FEIS & Notes
NEPA 101(b)(4); 40 CFR 1502.16(a)(10); 32 CFR Part 651, 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 3.5</li> <li>• Section 3.9</li> <li>• Section 3.10</li> </ul>
NEPA 101(b)(4)	HAR 11-200.1-24(g)(7)	Historic perspective.	<ul style="list-style-type: none"> <li>• Sections 1.1 and 1.2</li> <li>• Section 2.2.4.2</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>• Sections 3.6, 3.7, 3.8, 3.10, and 3.14</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 3.11</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 3.6, 3.7, 3.13, and 3.14</li> </ul>
<b>Environmental Consequences &amp; Potential Mitigation Measures</b>			
NEPA 102(2)(C)(i); 40 CFR 1502.10(a)(6), 1502.16; 32 CFR 651.43(g) and Appendix E (b)(7)(iv)		The comparison of the proposed action and reasonable alternatives shall be based on the discussion of their reasonably foreseeable effects and the significance of those effects, focusing on the significant or important effects.	<ul style="list-style-type: none"> <li>• ES.9 and ES.10</li> <li>• Chapter 3 – resource section analyses</li> <li>• Section 3.15</li> <li>• Chapter 3 – Reasonably Foreseeable Action (RFA) and Cumulative Impact subsections</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.	
	HAR 11-200.1-24(d)(2)	Significant beneficial and adverse impacts.	

**Table A-1: NEPA-HEPA Compliance Guide**

NEPA Reference	HEPA Reference	Requirement	Location in FEIS & Notes
NEPA 102(2)(C)(v); 40 CFR 1502.16(a)(2); 32 CFR Part 651, Appendix E (b)(7)(xi)		Any probable adverse environmental effects that cannot be avoided.	
	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 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) 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>• ES.11</li> <li>• Section 3.6</li> <li>• Section 3.7</li> <li>• Section 3.8</li> <li>• Section 3.9</li> <li>• Section 3.10</li> <li>• Section 3.13</li> <li>• Section 3.14</li> <li>• Section 3.15</li> <li>• Section 4.3.2</li> <li>• Sections 4.4</li> <li>• Volume II - Appendix J</li> </ul>

**Table A-1: NEPA-HEPA Compliance Guide**

NEPA Reference	HEPA Reference	Requirement	Location in FEIS & Notes
40 CFR 1502.14(e)		Include appropriate mitigation measures not already included in the proposed action or alternatives.	<ul style="list-style-type: none"> <li>• ES.11</li> <li>• Section 3.15</li> </ul>
40 CFR 1502.16(a)(11); 32 CFR Part 651, Appendix E(b)(7)(x)		Means to mitigate adverse environmental impacts.	<ul style="list-style-type: none"> <li>• ES.11</li> <li>• Section 3.5.5.3</li> <li>• Section 3.12.5.3</li> <li>• Section 3.15</li> </ul>
	HAR 11-200.1-24(d)(3)	Proposed mitigation measures	
	HAR 11-200.1-24(p)	Mitigation measures to reduce significant, unavoidable, adverse impacts to insignificant levels, and the basis for considering these levels acceptable.	<ul style="list-style-type: none"> <li>• Section 3.1.4</li> <li>• ES.11</li> <li>• Chapter 3 – resource section analyses</li> <li>• Section 3.15</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 3.5.5</li> <li>•</li> </ul>
<b>Cumulative Impacts</b>			
40 CFR 1502.16(a)(1), 1508.1(g)(3); 32 CFR Part 651, Appendix E (b)(7)(ix)		Cumulative effects of the proposed action in light of other past, present, and reasonably foreseeable actions.	<ul style="list-style-type: none"> <li>• ES.10</li> <li>• Section 3.1.5.3</li> <li>• Chapter 3 – RFA and Cumulative Impacts subsections</li> </ul>
	HAR 11-200.1-24(i)	Related actions, public and private, existing or planned in the region.	
	HAR 11-200.1-24(l)	Interrelationships and cumulative environmental impacts of the proposed action and other related actions.	



**Table A-1: NEPA-HEPA Compliance Guide**

NEPA Reference	HEPA Reference	Requirement	Location in FEIS & Notes
<b>Direct and Indirect Effects</b>			
NEPA 102 (2)(C)(i); 40 CFR 1508.1(i)(1); 32 CFR Part 651, Appendix E (b)(7)(i)		Direct effects, which are caused by the action and occur at the same time and place.	<ul style="list-style-type: none"> <li>• ES.9</li> <li>• Section 3.1.4</li> <li>• Chapter 3 – resource section analyses</li> </ul>
NEPA 102 (2)(C)(i); 40 CFR 1508.1(i) (2); 32 CFR Part 651, Appendix E (b)(7)(ii)		Indirect effects, which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable.	
	HAR 11-200.1-24(l)	Consideration of all consequences including direct and indirect effects	
<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(a)(3); 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 4.6</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 1502.22; 32 CFR Part 651, Appendix E (b)(4)		If an agency is considering a cost-benefit analysis for the proposed action relevant to the choice among alternatives with different environmental effects, the agency shall incorporate the cost-benefit analysis by reference or append it to the statement as an aid in evaluating the environmental consequences.	N/A

**Table A-1: NEPA-HEPA Compliance Guide**

NEPA Reference	HEPA Reference	Requirement	Location in FEIS & Notes
<b>Incomplete Information/Unresolved Issues</b>			
40 CFR 1502.21(a); 32 CFR 651.44		When an agency is evaluating reasonably foreseeable significant effects on the human environment in an environmental impact statement, and there is incomplete or unavailable information, the agency shall make clear that such information is lacking.	<ul style="list-style-type: none"> <li>• ES.12</li> <li>• Section 4.2</li> </ul>
40 CFR 1502.21(b); 32 CFR 651.44(a)		If the incomplete information relevant to reasonably foreseeable significant effects is essential to a reasoned choice among alternatives, and the overall costs of obtaining it are not unreasonable, the agency shall include the information in the environmental impact statement.	
	HAR 11-200.1-24(d)(5)	Unresolved issues.	<ul style="list-style-type: none"> <li>• ES.12</li> <li>• Section 4.2</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.	
<b>Other Required Considerations</b>			
	HAR 11-200.1-24(d)(7)	A list of relevant EAs and EISs considered in the analysis of the preparation of the EIS.	<ul style="list-style-type: none"> <li>• ES.3</li> <li>• Chapter 1</li> <li>• Volume II – Appendix F</li> </ul>
40 CFR 1502.16(a)(7); 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 4.5</li> </ul>
40 CFR 1502.16(a)(8)		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.	

**Table A-1: NEPA-HEPA Compliance Guide**

NEPA Reference	HEPA Reference	Requirement	Location in FEIS & Notes
NEPA 102(2)(C)(v); 40 CFR 1502.16(a)(4); 32 CFR Part 651, Appendix E (b)(7)(vi)	HAR 11-200.1-24(n)	Any irreversible or irretrievable commitments of Federal resources that would be involved in the proposal should it be implemented.	
	HAR 11-200.1-24(n)	Identification of unavoidable impacts	<ul style="list-style-type: none"> <li>• ES.9</li> <li>• Chapter 3 – resource section analyses</li> <li>• Section 3.15</li> <li>• Sections 4.4 and 4.5</li> </ul>
	HAR 11-200.1-24(n)	Possibility for environmental accidents.	<ul style="list-style-type: none"> <li>• Section 3.6</li> <li>• Section 3.14</li> </ul>
	HAR 11-200.1-24(l)	Secondary effects	<ul style="list-style-type: none"> <li>• Section 2.1</li> <li>• Section 3.7</li> <li>• Section 3.11</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>• Sections 4.4 and 4.6</li> </ul>
		Other interests and considerations of policies to offset adverse environmental effects of the proposed action.	<ul style="list-style-type: none"> <li>• ES.11</li> <li>• Chapter 3 – resource section analyses</li> <li>• Section 3.15</li> </ul>
<b>Consistency with Other Federal, State, and County Land Use Plans, Policies, and Controls</b>			
	HAR 11-200.1-24(d)(6)	Compatibility with land use plans and policies and a list of permits or approvals.	<ul style="list-style-type: none"> <li>• ES.13</li> <li>• Chapters 1 and 4</li> <li>• Section 3.2</li> </ul>

<b>Table A-1: NEPA-HEPA Compliance Guide</b>			
<b>NEPA Reference</b>	<b>HEPA Reference</b>	<b>Requirement</b>	<b>Location in FEIS &amp; Notes</b>
1502.16(a)(5)		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>• Sections 3.2, 3.3, 3.4, and 3.5</li> <li>• Section 4.3</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.	
<b>Publication of the Environmental Impact Statement</b>			
40 CFR Part 1502.20; 32 CFR 651.45		Agencies shall publish the entire draft and final environmental impact statements and unchanged statements.	<ul style="list-style-type: none"> <li>• Section 1.5</li> <li>• Section 7.2</li> </ul>
	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.	
40 CFR Part 1502.20(a); 32 CFR 651.45(e)(1), (h)		The agency shall transmit the entire statement electronically (or in paper copy, if requested due to economic or other hardship) to any Federal agency that has jurisdiction by law or special expertise with respect to any environmental impact involved and any appropriate Federal, State, Tribal, or local agency authorized to develop and enforce environmental standards.	
40 CFR Part 1502.20(b); 32 CFR 651.45(e)(2), (h)		The agency shall transmit the entire statement electronically (or in paper copy, if requested due to economic or other hardship) to the applicant, if any.	N/A
40 CFR Part 1502.20(c); 32 CFR 651.45(e)(3), (h)		The agency shall transmit the entire statement electronically (or in paper copy, if requested due to economic or other hardship) to any person, organization, or agency requesting the entire environmental impact statement.	<ul style="list-style-type: none"> <li>• Section 7.2</li> </ul>
40 CFR 1502.20(d); 32 CFR 651.45(h)		Provide the final environmental impact statement to any person, organization, or agency which submitted substantial comments on the Draft EIS.	<ul style="list-style-type: none"> <li>• Section 7.2</li> </ul>

**Table A-1: NEPA-HEPA Compliance Guide**

NEPA Reference	HEPA Reference	Requirement	Location in FEIS & Notes
	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>Chapter 7</li> </ul>
<b>Comments and Responses in a Draft EIS and Final 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>Volume II – Appendix E-1</li> </ul>
	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>Volume II – Appendix E-1</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 1.5</li> <li>Volumes II, III, and IV – Appendices C, D, and E</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>Chapter 7</li> </ul>
40 CFR 1501.9; 32 CFR 651.36		Public and governmental engagement.	<ul style="list-style-type: none"> <li>Section 1.5</li> <li>Chapter 7</li> <li>Volumes II, III, and IV – Appendices C, D, and E</li> </ul>
	HAR 11-200.1-24(s)(6)	A representative sample of the consultation request letter.	<ul style="list-style-type: none"> <li>Volume II – Appendix D</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>Volume II – Appendix E-2</li> </ul>

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Appendix B

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# Cultural Impact Assessment

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**FINAL—Cultural Impact Assessment  
for Army Training Land Retention of State Lands in Kahuku Training Area,  
Kawailoa-Poamoho Training Area, and Makua Military Reservation,  
Island of O‘ahu, Hawai‘i**

**TMKS: (1) 5-8-002:002; (1) 5-9-006:026; (1) 6-9-003:001 (por.); (1) 7-2-001:006; (1) 8-1-001:007 (por.); (1) 8-1-001:008; (1) 8-1-001:012 (por.); (1) 8-2-001:002 (por.); and (1) 8-2-001:001, 022, 024, and 025**

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May 12, 2023

## MANAGEMENT SUMMARY

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Kleinfelder, 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 6,322 acres of state of Hawai'i (State)-owned lands on O'ahu at the Kahuku Training Area (KTA), Kawaihoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR). These three project areas comprise the focus of this study.

The main objectives of this Cultural Impact Assessment are to analyze and assess the impact of the Proposed Action and its alternatives on cultural practices and features associated with the project areas 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 areas to make a good faith effort to identify cultural beliefs, practices, and resources of Native Hawaiians and other ethnic groups associated with the project areas.

The results of archival and ethnographic research yielded numerous cultural resources, practices, and beliefs associated with the project areas and the broad geographical areas. The most impacts to cultural resources from the Proposed Action and the continuation of ongoing military activity, as reflected in interviews, are for the MMR project area. Paramount among these is access to the MMR project area (excluding areas of the Makai Tract that have unlimited access to the public). Although current access policies exist for the areas with limited access, they are deemed inadequate by interviewees who desire safe, unlimited, and regular access to the entire MMR 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 MMR project area, this is due to public safety concerns. The continuation of current military activity within portions of the MMR 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 per current and existing access agreements, but current limitations on access are likely to continue into the foreseeable future.

Additionally, adverse impacts would continue within the MMR 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 Mākua Valley itself, including the project area, is a sacred setting, which is altered by the presence of military activity, and in particular, by debris (e.g.,

unexploded ordnance) left by prior military activity that continues to adversely impact the landscape despite the suspension of live-fire training.

Other impacts discussed by interviewees for all project areas, such as physical alteration on cultural resources, are associated with past actions within each project area and are currently mitigated by existing agreements, including the 2018 Programmatic Agreement (USAG-HI 2018a) for the KTA and Poamoho project areas and, for the MMR project area, the 2015 Memorandum of Agreement that addresses vegetation management and the potential impacts on historic properties (USAG-HI 2015), six separate Section 106 consultation documents regarding potential adverse effects on historic properties (USAG-HI 2014a, 2014b, 2014c, 2014d, 2014e, 2014f), the Ukanipō Heiau 2000 Programmatic Agreement (USAH 2000), and the 2009 Programmatic Agreement for routine military training (USAG-HI 2009).

Recommendations identified by interviewees to avoid, minimize, rectify, or reduce potential impacts from the Proposed Action include working with cultural practitioners to develop a mutually beneficial access plan that promotes engagement with cultural resources, practices, and beliefs within the project area, as well as promoting better long-term stewardship of the ʻāina with regard to military use of the land.

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## SELECT ACRONYMS AND ABBREVIATIONS

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A.B.C.F.M.	American Board of Commissioners of Foreign Missions
AR	Army Regulation
ATLR	Army Training Land Retention
ATV	all-terrain vehicle
CCC	Civilian Conservation Corps
CIA	Cultural Impact Assessment
CRM	Cultural Resources Manager
DLNR	Department of Land and Natural Resources
DOFAW	Division of Forestry and Wildlife
DPW	Directorate of Public Works
EIS	Environmental Impact Statement
GIS	geographic information system
HAR	Hawai'i Administrative Rules
HEPA	Hawaii Environmental Policy Act
HMA	Hawai'i Motorsports Association
HRS	Hawai'i Revised Statutes
Inc.	Incorporated
KLOA	Kawailoa Training Area
KTA	Kahuku Training Area
LCA	Land Commission Award
LLC	Limited Liability Company
MMR	Makua Military Reservation
NARA	National Archives and Records Administration
NAR	Natural Area Reserve
NEPA	National Environmental Policy Act of 1969

NHO	Native Hawaiian Organization
NPS	National Park Service
OEQC	Office of Environmental Quality Control
OHA	Office of Hawaiian Affairs
OR&L	Oahu Railway and Land Company
PA	Programmatic Agreement
Poamoho	Kawailoa-Poamoho Training Area
RDH	Range Division Hawaii
SLH	Session Laws of Hawai'i
TCP	Traditional Cultural Places
TMK	Tax Map Key
UAV	unmanned aerial vehicle
USACE	United States Army Corps of Engineers, Honolulu District
USAEC	United States Army Environmental Command
USAG-HI	United States Army Garrison-Hawaii
USAH	United States Army, Hawaii
USGS	United States Geological Survey
U.S.	United States
UXO	unexploded ordnance

# 1 INTRODUCTION

---

Kleinfelder, Inc. and Honua Consulting, LLC prepared this Cultural Impact Assessment (CIA) in support of an Environmental Impact Statement (EIS) being prepared by the United States (U.S.) Army Corps of Engineers, Honolulu District (USACE) for the U.S. Army Garrison-Hawaii (USAG-HI). The EIS analyzes the environmental and cultural impacts of the proposed retention of up to approximately 6,322 acres of state of Hawai'i (State)-owned lands on O'ahu at the Kahuku Training Area (KTA), Kawaihoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) (Figure 1). The CIA was prepared to comply with Hawaii Environmental Policy Act (HEPA) requirements (Hawai'i Revised Statutes [HRS] Chapter 343 and Hawai'i Administrative Rules [HAR] Chapter 11-200.1). The retention of State-owned lands, also referred to in the EIS and throughout the current document as the project areas, is a real estate/administrative action that would enable continued military use of the State-owned lands. The EIS to which this CIA is appended evaluates the potential impacts of a variety of alternatives that meet the Purpose and Need of the project. Alternatives analyzed in the EIS include 1) Full Retention of State-Owned Lands, 2) Modified Retention, 3) Minimum Retention, and 4) a No Action Alternative (no retention of State-owned lands after the terms of the current leases expire in 2029).

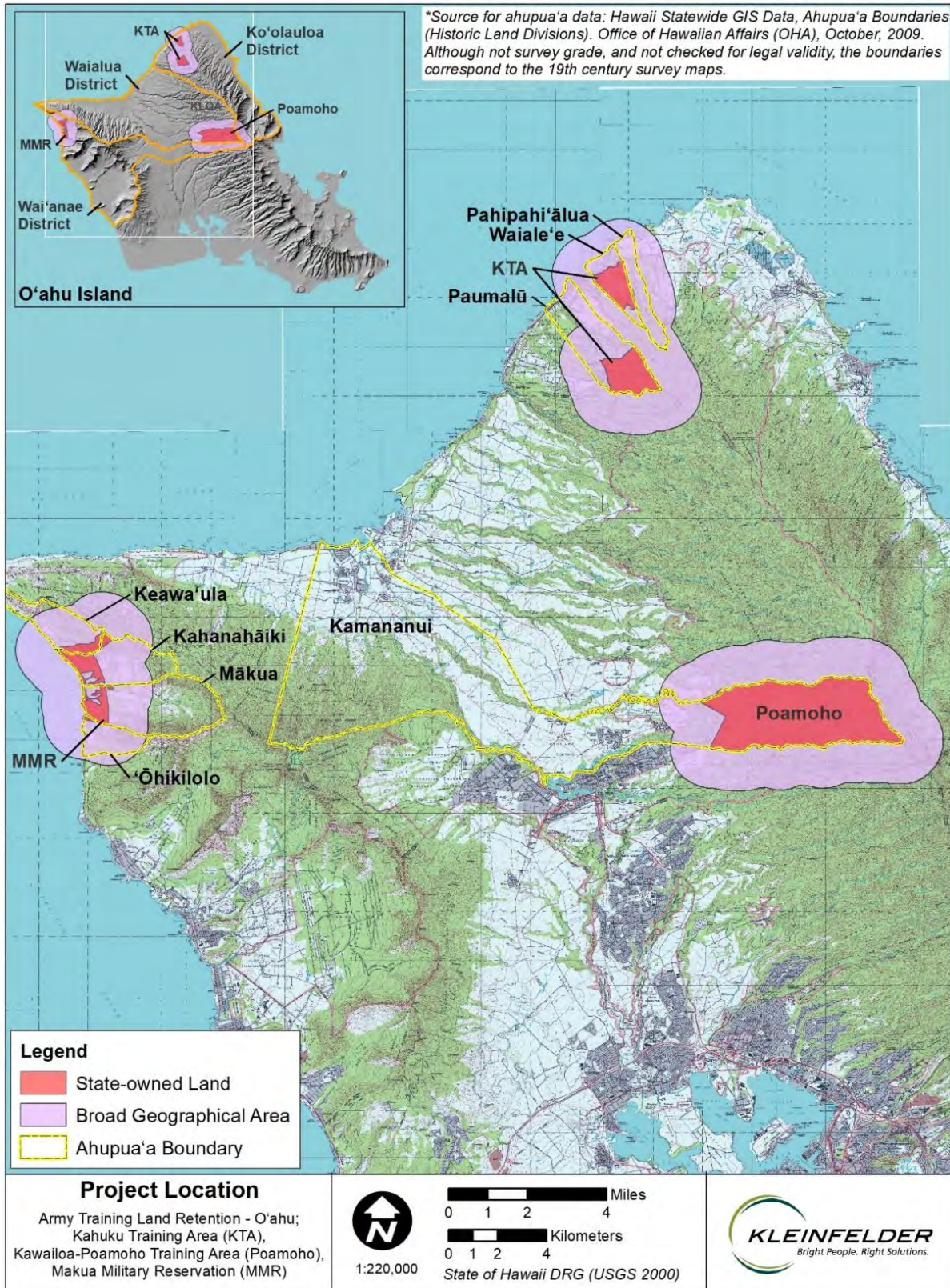
The main objectives of this CIA are to analyze and assess the impact of the Proposed Action, alternatives, and mitigating measures on cultural practices and features associated with the project areas to promote responsible decision making. These objectives are guided by the Hawaii State Office of Environmental Quality Control (OEQC)<sup>1</sup> "Guidelines for Assessing 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 areas to make a good faith effort to identify cultural beliefs, practices, and resources of Native Hawaiians and other ethnic groups associated with the project areas.

## 1.1 PROPOSED ACTION

The Army proposes to retain up to approximately 6,322 acres of State-owned lands prior to the expiration of the current leases in 2029 to ensure training is not interrupted. The purpose of the Proposed Action is to enable the Army to continue to conduct ongoing activities (training and other activities, such as public use programs) on the State-owned lands within KTA, Poamoho, and MMR, including those activities needed to meet its current and future training and combat readiness requirements. The Army would continue to permit and coordinate training and other activities on the retained State-owned lands by outside users of these installations.

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<sup>1</sup> As of July 1, 2021, the OEQC is now part of the Environmental Review Program within the Hawaii State Office of Planning and Sustainable Development.



**Figure 1. Overview of State-owned lands and broad geographical areas at KTA, MMR, and Poamoho.**

The Proposed Action is a real estate action (i.e., an administrative action). It does not include construction or changes in military training activities or resource management actions. Additionally, the Proposed Action does not include changes to the use, size, or configuration of the special use airspace overlying the State-owned lands. The type, volume, and conduct of training, maintenance and repair activities, and resource management actions that occur on KTA and Poamoho were described in the 2018 *Programmatic Agreement among 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 Training Areas and Ranges on the Island of O‘ahu, Hawai‘i* and the 2008 *Oahu Implementation Plan*. Training activities on MMR were described in the U.S. Fish and Wildlife Service’s 2007 *Re-initiation of the 1999 Biological Opinion of the USFWS for U.S. Army Military Training at Makua Military Reservation*, the 2009 *Final Environmental Impact Statement Military Training Activities at Makua Military Reservation, Hawai‘i*, and the 2017 *MMR Integrated Wildland Fire Management Plan*.

## **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 (collectively referred to as HEPA) for the environmental impact assessment process 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 the existing definition of EIS in 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 areas, who do not necessarily share the same ethnic group) and State, particularly the Native Hawaiian community.

This document supports the NEPA and HEPA processes by compiling information on existing conditions of cultural resources, practices, and beliefs known to exist within the State-owned lands. This document will be appended to the EIS as a contributing technical study.

### **1.3 PROJECT AREA DESCRIPTIONS**

The project areas for the Proposed Action consist of approximately 6,322 acres of State-owned lands within three Army installations on O‘ahu that are currently leased by the U.S. Government. The project areas encompass eight complete and three partial Tax Map Key (TMK) parcels, as detailed for each installation in the sections below.

An assessment of cultural impacts from a Proposed Action should, in most instances, not be limited to the leased parcel boundaries of the project area but should consider “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). Unlike other Proposed Actions in the State of Hawai‘i, however, the current project areas are not easily bounded by a single ahupua‘a. Rather, they are comprised of four discontinuous project footprints (two at KTA, one at Poamoho, and one at MMR), each of which span more than one ahupua‘a. The boundaries of each project area also often abut ahupua‘a boundaries, precluding an actual buffer around the leased parcel boundaries of the project area. Further, each of the project areas is not easily bounded by a distinct geographical feature or landmark. The MMR project area is an exception since it is encompassed by the larger valley surrounding the project area, but this is not easily transferred to the KTA and Poamoho project areas.

With the intent to maintain a consistently developed “broad geographical area” for each project area, this analysis thus considers a one-mile buffer around each project area. This affords an opportunity for the analysis to be consistently “greater than the area over which the proposed action will take place” (OEQC 2012:11). In other words, this creates a broad geographical area surrounding the leased parcel boundaries of the Proposed Action’s project area.

This analysis will then consider a broad geographical area; however, the level of inquiry and study will be most intensive within the project area of the Proposed Action.

#### **1.3.1 Kahuku Training Area (KTA)**

KTA is located on the northern end of the Ko‘olau Mountain Range in northeast O‘ahu. This training area consists of approximately 9,480 acres, with approximately 1,150 acres (12%) being State-owned land. The project area for KTA is located within the Ko‘olauloa District and encompasses two discontinuous TMK parcels (TMK [1] 5-8-002:002 and [1] 5-9-006:026). The northern parcel (Tract A-1) is situated within the northern portion of KTA and is comprised of an approximately 440-acre parcel located in Waiale‘e Ahupua‘a, with a small (approximately 10 acres) portion extending east into Pahipahi‘ālua Ahupua‘a. The southern parcel (Tract A-3) is situated along the western KTA boundary and is comprised of an approximately 700-acre parcel located in Paumalū Ahupua‘a.

### **1.3.2 Kawailoa-Poamoho Training Area (Poamoho)**

The State-owned land at Poamoho comprises approximately 4,390 acres (19%) of the southern portion of the 23,455-acre Kawailoa Training Area (KLOA). The project area for Poamoho is situated within the interior portion of O‘ahu Island in the Waialua District and encompasses one TMK parcel (TMK [1] 7-2-001:006) within Kamananui Ahupua‘a. The project area extends west from the summit of the Ko‘olau Mountains to the eastern boundary of Wahiawā. The eastern portion of the project area for Poamoho is also referred to as the Proposed Natural Area Reserve (NAR) Tract (established by Hawaii Board of Land and Natural Resources in 2005), while the remaining western portion is referred to as the Poamoho Tract.

### **1.3.3 Makua Military Reservation (MMR)**

MMR is located in west O‘ahu and is bordered by the Wai‘anae Mountains to the east and the Pacific Ocean to the west. This training area consists of approximately 4,190 acres, with approximately 782 acres (19%) being State-owned land. The project area for MMR is located in the western portion of training area and within the Wai‘anae District. This project area is situated within four ahupua‘a: Keawa‘ula, Kahanahāiki, Mākua, and ‘Ōhikilolo; it encompasses five TMK parcels (TMKs [1] 8-1-001:008 and [1] 8-2-001:001, 022, 024, and 025) and a portion of four parcels (TMKs [1] 6-9-003:001, [1] 8-1-001:007 and 012, and [1] 8-2-001:002). The MMR parcels are also referred to as the Makai, North Ridge, Center, and South Ridge Tracts.

## **1.4 LIMITATIONS OF THE STUDY**

This study was initiated at the height of the COVID-19 pandemic when in-person contact was limited. Online surveys were thereby 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 extent.

The second phase of research, conducted in the summer of 2022, attempted to resolve this challenge by directly contacting knowledgeable individuals to request their participation in one-on-one interviews (Appendix A; see Section 2.2), which were subsequently compiled and utilized for the current study. The list of knowledgeable individuals was provided by USAG-HI, and the individuals contacted and interviewed were assumed to be familiar with the project area because of their previous 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 areas from the EIS Public Notice (see Section 2.2.1). While maps were not provided during the interviews, the interviewers have found that 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. For example, when discussing the KTA project area, informants often discuss the larger Kahuku area, which extended from Pūpūkea to Lā'ie depending on who is speaking. 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. Where interviewees share information that may confuse the reader, the authors have added footnotes to clarify information, at the request of the Army.



## 2 METHODOLOGY

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The main objectives of this CIA, per the HEPA process, are to analyze and assess the impact of the Proposed Action and its alternatives on cultural practices and features associated with the project areas to promote responsible decision making. These objectives are guided by the Hawaii State Office of Environmental Quality Control (OEQC) “Guidelines for Assessing Cultural Impacts” adopted November 19, 1997 (OEQC 2012:11–13).

The OEQC guidelines specifically recommend that preparers of CIAs implement the following protocols (OEQC 2012:12):

1. 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 (see Section 2.2);
2. Identify and consult with individuals and organizations with knowledge of the area potentially affected by the proposed action (see Section 2.2);
3. Receive information from or conduct ethnographic interviews and oral histories with persons having knowledge of the potentially affected area (see Section 2.2);
4. Conduct ethnographic, historical, anthropological, sociological, and other culturally related documentary research (see Chapters 3, 4, 5, and 6);
5. Identify and describe the cultural resources, practices, and beliefs located within the potentially affected area (see Sections 4.3, 5.3, and 6.3); and
6. 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).

Two main data sets were compiled to meet these objectives: 1) ethnographic archival documentation, and 2) data obtained from ethnographic interviews. 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 include, but are not limited to, the following elements (OEQC 2012:13):

1. A discussion of the methods applied (see Chapter 3) and results of consultation with individuals and organizations identified by the preparer as being familiar with cultural practices and features associated with the project area (see Sections 4.3, 4.4, 5.3, 5.4, 6.3, and 6.4), including any constraints or limitations which might have affected the quality of the information obtained (see Section 1.4).

2. 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 (see Section 2.2).
3. 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 (see Sections 2.2.3 and 1.4).
4. 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 (see Section 2.2.2.1).
5. A discussion concerning historical and cultural source materials consulted (see Section 2.1), the institutions and repositories searched and the level of effort undertaken (see Section 2.1). This discussion should include, if appropriate, the particular perspective of the authors (see Section 2.1.1 and 2.1.2), any opposing views, and any other relevant constraints, limitations or biases (see Sections 1.4 and 1.6).
6. 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 (see each project area Chapter as well as Sections 2.3.1, 4.3, 5.3, and 6.3).
7. 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 (see each project area Chapter as well as Sections 4.4, 5.4, and 6.4).
8. An explanation of confidential information that has been withheld from public disclosure in the assessment (see Section 1.5).
9. A discussion concerning any conflicting information in regard to identified cultural resources, practices and beliefs (see Section 1.6).
10. 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 (see Section 2.4 and Chapter 8).
11. A bibliography of references, and attached records of interviews which were allowed to be disclosed (see Chapter 11 and Appendix D).

The goal of this CIA is to provide a review of cultural resources, practices, and beliefs that are known to have occurred within the project areas or were likely to have occurred based on the resources present in the area and known practices associated with those resources. This 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 areas.

The following sections describe the methods and procedures that were implemented to address the six OEQC protocol recommendations for CIAs, including archival research; identification, consultation, and interviews of knowledgeable individuals and/or organizations; identification of cultural resources, practices, and beliefs within each project area and broad geographical area (i.e., potentially affected area); analysis of potential impacts on those cultural resources, practices, and beliefs from the Proposed Action; and mitigation measures to avoid, minimize, rectify, or reduce potential impacts from the Proposed Action.

## **2.1 ARCHIVAL RESEARCH METHODS**

Background research for development of 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 '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 W. Ellis (1963), J.P. Āī (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 State-owned lands and broad geographical areas.

Historical and archival resources were located in the collections of the Hawai'i 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 Hawai'i-Hilo Mo'okini Library; USAG-HI; 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; private family collections; and in the collection of Kumu Pono Associates LLC.

In addition to the broad range of primary references listed above, other source documents were researched to broaden the cultural background of the project areas, 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 that have survived the passing of time. Some of the mo'olelo (traditions and historical accounts) were translated here from the original Hawaiian by Kepā Maly.

Among the most significant sources of Native Hawaiian historical accounts are Hawaiian language newspapers that were printed between 1838 and 1948, and the early writings of foreign visitors and residents. 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. Those accounts describe native practices, the nature of land use, and native lore, providing a means of understanding how people related to their environment and sustained themselves from the land (Maly and Maly 2005:18).

As M. Puakea Nogelmeier (2010) discusses, there are beneficial impacts to a methodology that properly researches and considers Hawaiian language resources. He 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 employs a polyrhetorical approach, whereby historical accounts, regardless of language, are researched and considered (Nogelmeier 2010).

Parts of the archival research used in this CIA were previously compiled and published by Kepā and Onaona Maly and others, who are cited in this document.

### **2.1.2 Historical Maps**

Historical maps were used to locate potential places, names, features, and resources pertinent to the current study. Historical maps are useful for this type of study since surveyors of the eighteenth and nineteenth centuries documented features and resources on the landscape throughout Hawai'i in more detail than the prior centuries.

Historical maps were georeferenced, to the extent possible, using ESRI ArcMap 10.8.1 software and overlaid with a geographic information system (GIS) shapefile of the project areas; note, historical maps prepared using older cartographic methods do not always accurately depict the physical landscape, which

makes georeferencing difficult. Historical maps were then 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 areas.

### **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 areas.

### **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 areas.

Information regarding recorded archaeological sites helps inform the development of a CIA by indicating practices that may have occurred at tangible cultural resources. For example, the practice of uhaū 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 fishing shrines within a project area.

Similarly, this CIA also uses information from biological studies to identify whether biological resources present within the project areas are associated with cultural resources, practices, and beliefs, such as the practice of lā'au lapa'au, which is the Traditional Hawaiian<sup>2</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 are also not 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.”

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<sup>2</sup> “Traditional Hawaiian” in this document refers to Hawaiian customs, practices, and beliefs that have been shared through multiple generations of Hawaiians.

## 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 areas 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 consultation for the CIA, Honua Consulting, LLC placed public notices in the Office of Hawaiian Affairs' (OHA) *Ka Wai Ola* for the month of October 2021. Figure 2 provides a copy of this notice. While no direct responses were received by phone or email concerning this notice, individuals did respond to the survey link provided in the notice. A description of the online survey is in Section 2.2.1.2, and summaries of the online responses for each project area are in Sections 4.2.1, 5.2.1, and 6.2.1.

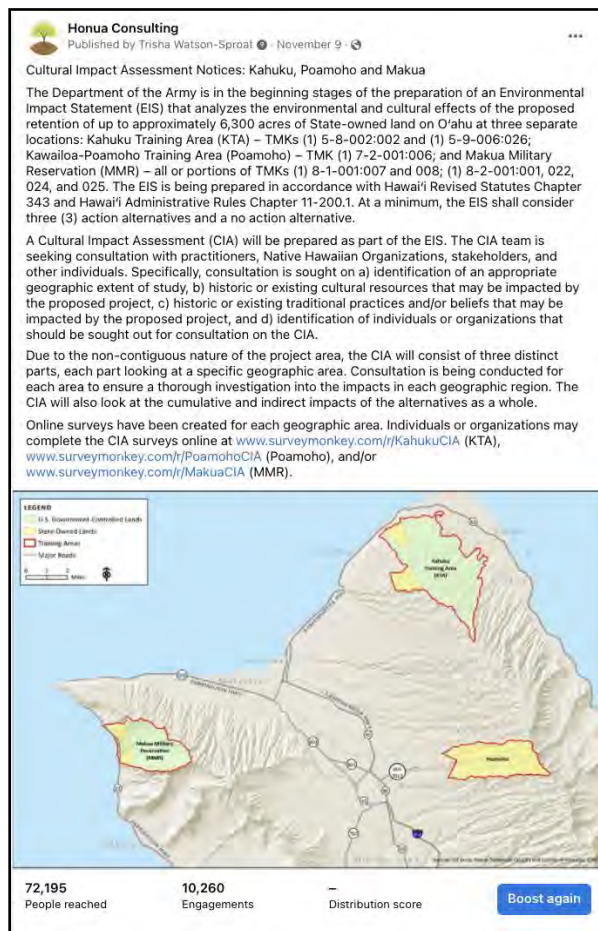


**Figure 2. Ho'olaha Lehulehu (Public Notice) that ran in the October 2021 OHA's Ka Wai Ola.**

### 2.2.1.2 Social Media

In addition to *Ka Wai Ola*, Honua Consulting, LLC placed a notice on their Facebook and Instagram accounts, which announced the preparation of the CIA, sought knowledgeable individuals for consultation, and provided a link to an online survey (Figure 3). The notice targeted the general public to identify potential persons who may be interested in participating and sharing information relevant to the current study. By making participation available to any interested party, the current study sought to maximize opportunity for participation to a wide group of individuals.

The online survey contained twenty-one questions to solicit preliminary information on the respondent’s biographical details; potential association with the project areas; knowledge of cultural resources, practices, and beliefs associated with the project areas; 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.



**Figure 3. Social media notice that ran on Facebook and Instagram with a link to the online survey.**

Seven individuals provided responses to the online survey for the KTA project area, four individuals responded for the Poamoho project area, and seven individuals responded for the MMR project area. The information given by these respondents provided preliminary information but was not used in the full analysis for the current study. Survey respondents were provided Honua Consulting, LLC's contact information but none of the respondents contacted Honua Consulting, LLC for a one-on-one interview. Summaries of the online responses for each project area are in Sections 4.2.1, 5.2.1, and 6.2.1.

### **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 areas. These organizations and individuals were assembled from the list of Native Hawaiian Organizations (NHOs) and other parties provided by USAG-HI, dated March 23, 2022, who identified their interest in being contacted about the project areas. 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.

In total, 44 individuals were contacted via emails. Of these, 10 were interviewed (23%),<sup>3</sup> 28 did not respond to interview requests (64%), and six individuals declined to be interviewed (13%).

### **2.2.2 Interview Selection Criteria**

The goal of the outreach process discussed above was to obtain at minimum six one-on-one interviews per project area, 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 criteria:

- Have expertise concerning the types of cultural resources, practices, and beliefs found within the project area and/or the broad geographical area [OEQC (2012:12)];
- Have knowledge of the area potentially affected by the Proposed Action [OEQC (2012:12)];
- Have a historical or genealogical relationship to the project area [OEQC (2012:12)];

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<sup>3</sup> Ten interviews is above average for CIAs conducted on the island of O'ahu, as seen in a review of EISs on the Hawaii State Office of Planning and Sustainable Development (2023) website.



- 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**

Ten individuals provided one-on-one interviews for the current study. Eight of the ten individuals provided an interview for the KTA project area, seven of the ten individuals provided an interview for the Poamoho project area, and all ten individuals provided an interview for the MMR project area. Biographical information for each interviewee is provided below by alphabetical order.

#### **Mr. William Ailā**

Mr. Ailā provided an interview for the MMR project area. Mr. Ailā’s historical and genealogical relationship to the project area is through his family and upbringing in that he was born and raised in Wai’anae (which encompasses the MMR project area) and has ties to an uncle (Ivanhoe) who was associated with Mākua. Mr. Ailā also shared that he has been fishing at Mākua Beach for over 50 years. Mr. Ailā is currently the chair and director of the Department of Hawaiian Homelands. In the capacity of the interview for the current study, Mr. Ailā expressed that he is representing Hui Mālama O Mākua.

#### **Mr. Peter Apo**

Mr. Apo provided an interview for the KTA and MMR project areas.

Regarding the KTA project area interview, Mr. Apo expressed that he is knowledgeable of Native Hawaiian cultural activities and the KTA project area. He also asserted that he chose not to represent any organization or ‘ohana for the KTA project area interview, and that his comments and insight are personal in nature. He did not elaborate on the personal nature of his association with the KTA project area.

Mr. Apo’s historical and genealogical relationship to the MMR project area results from his upbringing in the Mākaha/Mākua area, which encompasses the MMR project area. Mr. Apo also stated that he has been involved with Native Hawaiian concerns regarding the use of Mākua Valley, which includes the MMR project area, since the 1970s.

#### **Mr. (Norman) Mana Kaleilani Cáceres**

Mr. Cáceres provided an interview for the KTA, Poamoho, and MMR project areas.

Mr. Cáceres has knowledge and cultural expertise of all three project areas through his role as a Native Hawaiian cultural consultant on consultation efforts across the State of Hawai'i as well as on an international level. Mr. Cáceres stated that he represents 'Ohana Huihui for these interviews.

Mr. Cáceres' historical and genealogical relationship to the KTA project area stems from his mother who is from Kahuku, which encompasses the KTA project area. Mr. Cáceres' other genealogical connections to the area include his great grandparents who lived in Lā'ie as well as his grandmother and father who were raised in Lā'ie. One of Mr. Cáceres' grandmothers had knowledge of burial caves in the Kahuku area and was responsible for maintaining them. Mr. Cáceres stated that he has been invited to help care for burial caves in the area but did not specify if these were located within the KTA project area or its broad geographical area.

Mr. Cáceres expressed that his knowledge of the Poamoho project area stems from his work as a Native Hawaiian cultural consultant. He also shared that he has spent time in the area with individuals who are from the Poamoho/Wahiawā area and who are knowledgeable about cultural resources in the area as well as its cultural significance. Mr. Cáceres did not specify, however, whether he was referring to the Poamoho project area or its broad geographical area.

Mr. Cáceres' historical relationship with the MMR project area stems from living in the Wai'anae area, which encompasses the MMR project area, with his family. Mr. Cáceres' expertise as a Native Hawaiian cultural consultant also stems partly from his experience serving as a Cultural Monitor in Mākua Valley, which includes the MMR project area.

#### **Mr. Eric Enos**

Mr. Enos provided an interview for the MMR project area. Mr. Enos' historical and genealogical relationship to the project area is as a Native Hawaiian who was born and raised near the MMR project area. Mr. Enos also shared that Mākua Beach and the surrounding coastlines were his fishing grounds as he was growing up. Mr. Enos' cultural expertise also stems from his role as the Executive Director of the Ka'ala Learning Center and Ka'ala Farm, whose mission is to perpetuate the living culture of the Hawaiian people.

#### **Mr. (Nathan) Keola Grace**

Mr. Grace provided an interview for the KTA, Poamoho, and MMR project areas. Mr. Grace has broad knowledge and cultural expertise applicable to all three project areas as a member of the Royal Order of Kamehameha I, an organization whose goals include, in part, to perpetuate Native Hawaiian practices and beliefs. Mr. Grace also serves as a consulting party to USAG-HI.

**Mr. Neil J. Kaho'okele Hannahs**

Mr. Hannahs provided an interview for the KTA, Poamoho, and MMR project areas. Mr. Hannahs expressed that he is knowledgeable of the general area around the KTA and Poamoho project areas through his former role with Kamehameha Schools, where he managed lands at Kawailoa. Mr. Hannahs expressed that he has knowledge of and a historical relationship to the MMR project area through his upbringing on West O'ahu. He shared that he would often visit the makai portion of the MMR project area and the broad geographical area to surf and to visit the beach and Kāneana Cave.

**Mr. Allen Hoe**

Mr. Hoe provided an interview for the KTA, Poamoho, and MMR project areas.

Mr. Hoe expressed that his historical association and knowledge of the KTA project area is from his upbringing when he would often visit and hike in the general area.

Mr. Hoe expressed that he does not represent a specific Hawaiian cultural group and did not identify any historical or genealogical connection or cultural expertise associated with the Poamoho project area.

Mr. Hoe is personally associated with the MMR project area having spent time in the area as a child. He said his 'ohana used to camp at Mākua Beach in the late 1940s to the early 1950s. Given his military experience, Mr. Hoe noted that he is familiar with the military usage of the valley and its cultural relevance. He expressed, however, that he does not represent a specific Hawaiian cultural group.

**Mr. Kyle Kajihiro**

Mr. Kajihiro provided an interview for the KTA, Poamoho, and MMR project areas.

Mr. Kajihiro currently resides in Mō'ili'ili, Hawai'i. He was born in Honolulu and raised in various parts of Mō'ili'ili, Hawai'i. Mr. Kajihiro has a Ph.D. in Geography from the University of Hawai'i and is a lecturer at the University of Hawai'i at Mānoa. Mr. Kajihiro is not representing any organization or 'ohana for the interview. The opinions he shared during his interview are his personal comments drawn from personal experiences he has gained through his work with the American Friends Service Committee and his involvement with various groups that are involved with various land issues and the military. In addition to the interview, Mr. Kajihiro submitted a response via email attachment on behalf of Hawai'i Peace and Justice (of which he is a Board member) and Koa Futures, a group of Hawai'i residents concerned about the effects of military activities in Hawai'i and the Pacific Region.

He has an association with KTA through earlier opposition to the Stryker Brigade project. Mr. Kajihiro does not personally have direct knowledge of KTA; however, he has heard many testify about the cultural

resources and cultural practices that took place in the area and the impacts that the Army has had on the cultural resources which includes restricted access to sites.

Mr. Kajihiro commented that he does not have any association with Poamoho; however, he knows and has supported the efforts of groups who have kuleana to mālama Kūkaniloko.

Mr. Kajihiro has an association with MMR through his concern about the military's lease of Mākua Valley and the possibility of an extended lease of Mākua to the military.

**Mr. Thomas Lenchanko**

Mr. Lenchanko provided an interview for the KTA, Poamoho, and MMR project areas. He mentioned that he represents 'Ohana Whitmore and the pu'uhonua (place of refuge, sanctuary) of Kūkaniloko for these interviews.

Mr. Lenchanko identified that his relationship to the KTA, Poamoho, and MMR project areas is from his role as a caretaker of Kūkaniloko. Mr. Lenchanko asserts that all three project areas are connected to the pu'uhonua of Kūkaniloko, which extends over 36,000 acres and includes all three project areas. Mr. Lenchanko stated that the ka'ānani'au (land section) of 'Ō'io extends from Kahuku and the surrounding land parcels back up to the central plain of Kūkaniloko.

**Mr. Christophor Edward Oliveira**

Mr. Oliveira provided an interview for the KTA, Poamoho, and MMR project areas. Mr. Oliveira expressed that his historical and genealogical relationship with all three project areas stems from his genealogy which is of O'ahu lineage, particularly from O'ahu ali'i. Mr. Oliveira explained that his kūpuna were Kuihelani, a chief who ruled on O'ahu who he traces back to Mākua and other places, as well Kale'ula of Kūkaniloko and Ka'apuiki, a konohiki of Wai'anae and 'Ewa. Mr. Oliveira stated that he represents the Kua 'Ike Foundation and the Malae Ha'akoa for these interviews.

Mr. Oliveira stated that his specific historical relationship and cultural expertise associated with the KTA project area is from his role as a Native Hawaiian cultural consultant for the Army.

Mr. Oliveira expressed that he is associated with the Poamoho project area through his Wai'anae lineage. Mr. Oliveria explained that the Wahiwā area, including Poamoho, is connected to Wai'anae through the ali'i, Mā'ilikūkahi. Traditionally, Wahiwā and Poamoho were a part of the Wai'anae District. Mr. Oliveira expressed that he is knowledgeable of some traditions and resources within Poamoho and the surrounding area, including genealogies and place names.

Mr. Oliveira's specific historical relationship with the MMR project area results from his upbringing in Nānākuli and Wai'anae, which to many Native Hawaiians is closely associated with Mākua Valley, which includes the MMR project area. He also asserts that he is knowledgeable of the MMR project area through his role in a NHO, which he explains is comprised of signatories for burial sites at Mākua.<sup>4</sup>

### **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, nine of the ten interviews were conducted over the telephone and one interview was conducted in person. One of the ten interviewees provided supplemental information via email after his interview.

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

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<sup>4</sup> The Army provided clarification that the NHO mentioned here, Ko'a Mana, is a signatory to the Piliā'au Army Recreation Center (PARC) NAGPRA Comprehensive Agreement 2018 and the PARC Seawall Stockpile Plan of Action 2022 for the burial site at PARC in Wai'anae. The authors note that PARC is not within the MMR project area or broad geographical area.

- Producing a finalized summary, incorporating any interviewee edits, to be included in the CIA as an appendix (see Appendix D) and to be used for the impact analysis and mitigation recommendations.

All material, including tapes of interviews, remain the property of the interviewee, which is consistent with the treatment of indigenous informants globally. The consent forms of interviewees who participated in this project are 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 each 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 areas prior to the U.S. military leases of the State-owned lands. 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 areas. While the authors recognize the ethnic diversity of the state of Hawai'i, Native Hawaiians are the predominant ethnic group that has concerns about the project areas and 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 attempted to pinpoint the location where identified practices occur and where resources may be situated within the project areas. 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 resources and their associated practices and/or beliefs can often be directly tied to the project areas, 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 ʻāina (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.

Where clarifying information was not provided by informants regarding direct or indirect connections of practices and beliefs to the Oʻahu Army Training Land Retention (ATLR) project areas, the authors relied on access request data provided by USAG-HI Directorate of Public Works (DPW) staff to help determine resources most often visited within the project areas and/or practices most often cited as the reason for requesting access (see Section 7.4).

## **2.4 IMPACT ANALYSIS METHODS**

Once cultural resources, practices, and beliefs within each project area and broad geographical area were identified, the potential impacts from the Proposed Action and its alternatives on those cultural resources were identified and analyzed. Survey data was not utilized in the analysis of impacts due to the limitations identified in Section 1.4.

Impacts were identified from concerns shared during the survey and interview process. Two questions were formulated to solicit this information:

- 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 (note, survey data was not analyzed):

- 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?), and
- 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, to propose to the Army.



### 3 CULTURAL CONTEXT

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This section provides a contextual framework for understanding a broad range of interconnected cultural resources, practices, and beliefs that generally occurred throughout the project areas and the broad geographical areas. 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, however, were not just entertainment or art. They became historical repositories of Hawai‘i’s traditional social and political history and contained explanations of native knowledge and management systems.

#### 3.3 CEREMONIAL PRACTICES AND PERFORMANCES

Similar to its role in transmitting traditional knowledge as discussed above, cultural practices such as mele, oli, pule, and hula are also performed as a 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 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).

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 Hawaiian creation stories are important for understanding Hawaiian traditional beliefs, because they speak to the kinship that exists between Hawaiians and the land.

The Kumulipo, for example, is a 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 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 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 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 Hawaiians (Maly and Maly 2005:4–10).

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 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:

Aloha na hale o maua i makamaka ole!  
Ka alanui hele mauka o Huliwale.  
E huli ae ana au i makana ia oe, a-a-a  
Aloha wale, e-, kua, a-a-a!

Grief for our home without our friend!  
The road that leads to the mountain Gainless-Search.  
I am seeking a gift for you, alas!  
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. Native 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 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 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 Hawaiian language experts. These mo'olelo date back to the first-hand accounts of those who traveled through and resided in the project areas. 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:

telling people about (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 lands and broad geographical areas.

### **3.6 KILO (ENVIRONMENTAL AND WEATHER-RELATED OBSERVATIONAL PRACTICES)**

Understanding climate and weather were a necessity in Hawaiian culture since it impacted fishing practices, navigation, travel, and other activities. Kilo is the Traditional 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.

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 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 have and 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 paradisiaca*), 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. 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 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 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 Hawaii 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 (DOFAW 2018:8). When asked how many game animals were harvested on public hunting areas, 577 hunters responded and reported harvesting 1,551 mammals on O'ahu for the year 2017 (DOFAW 2018:14, 16–18), and 227 hunters responded and reported harvesting 441 game birds on O'ahu 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. The traditional reliance on the natural environment for cures to various ailments, illnesses, and sicknesses is still actively taught and practiced today.

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 Hawaiians (Malo 1951:19). Uhaū 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 KAHUKU TRAINING AREA (KTA)

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The project area for KTA is located near the northern tip of O‘ahu within the Ko‘olauloa District and encompasses two discontinuous TMK parcels (TMK [1] 5-8-002:002 and [1] 5-9-006:026) totaling approximately 1,150 acres (Figure 4–Figure 6). The northern parcel (Tract A-1) is situated within the northern portion of KTA and is comprised of an approximately 440-acre parcel located in Waiale‘e Ahupua‘a, with a small (approximately 10 acres) portion extending east into Pahipahi‘ālua Ahupua‘a. The southern parcel (Tract A-3) is situated along the western KTA boundary and is comprised of an approximately 700-acre parcel located in Paumalū Ahupua‘a.

This chapter provides a cultural contextual overview of archival and interview data obtained for the KTA project area. Section 4.1 presents aspects of KTA’s natural environment, cultural landscape, and archival history, as well as summarizes findings from ethnographic studies conducted in the project area. Section 4.2 summarizes the responses received from the online survey as well as one-on-one interviews. Section 4.3 presents an overview of identified cultural resources, practices, and beliefs obtained from this research, and Section 4.4 discusses potential impacts on these cultural resources, practices, and beliefs.

### 4.1 ARCHIVAL RESEARCH

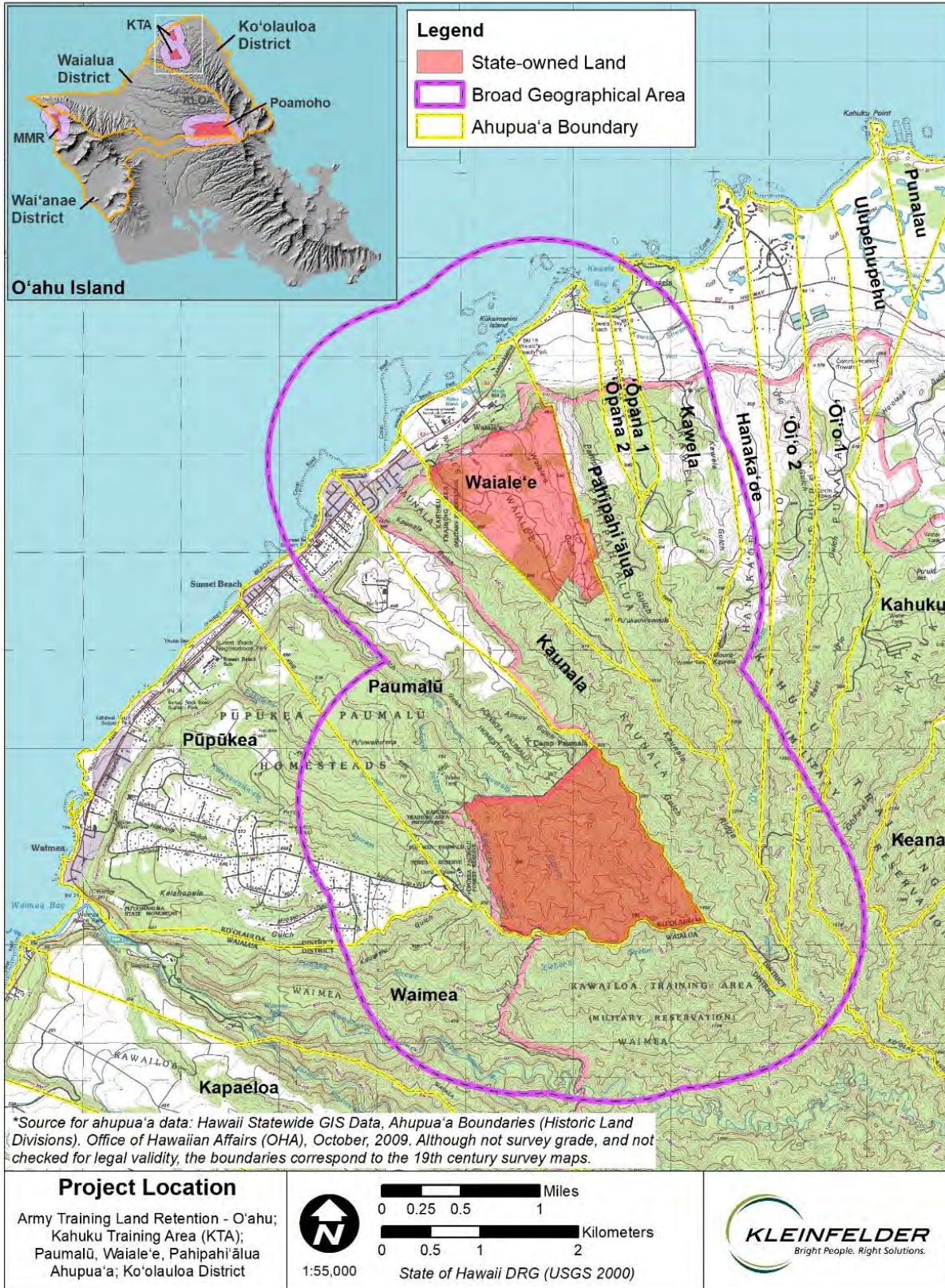
Archival research was conducted for the natural environment, cultural landscape, archival history, and previous ethnographic interviews to search for historical recordation of cultural resources, practices, and beliefs that may have occurred in the project area. The results of that research are contained in the following sections.

#### 4.1.1 Natural Environment

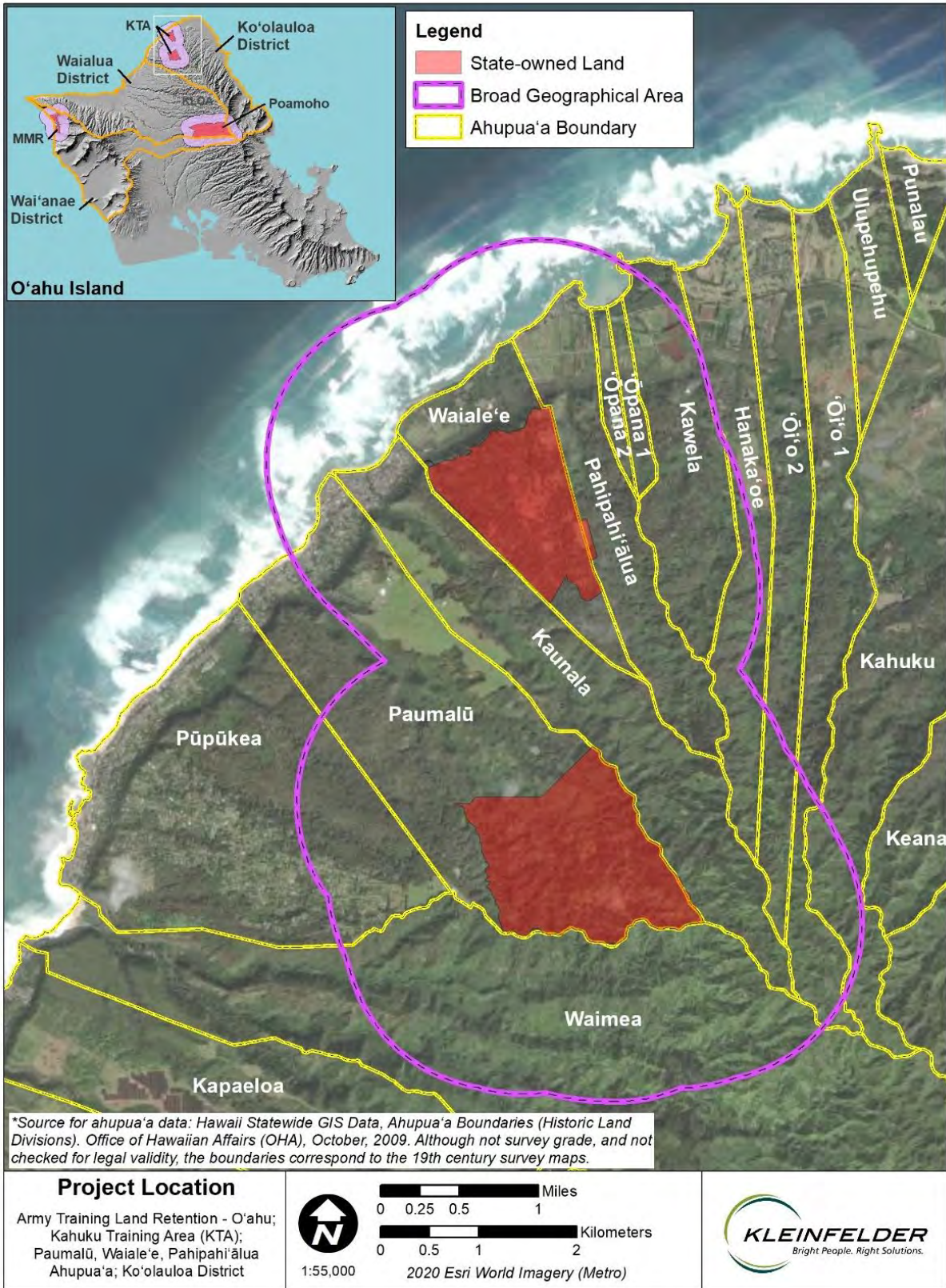
Hawaiians developed and maintained prosperous and symbiotic relationships with their natural environment, such that “Hawaiian culture does not have a clear dividing line of where culture ends and nature begins” (Maly 2001:1). The practice of identifying and naming of various aspects of the natural environment imbued cultural significance into the rains, the winds, and other natural features.

The project area for KTA is two discontinuous parcels in the moku (traditional district) of Ko‘olauloa, one located within Waiale‘e and Pahipahi‘ālua Ahupua‘a (Tract A-1) and the other located within Paumalū Ahupua‘a (Tract A-3) (see Figure 4). There are various environmental aspects within the KTA project area and the broad geographical area that have cultural significance. These are discussed below.





**Figure 4. Overview of the State-owned land at KTA and the broad geographical area, shown on 2000 USGS DRG map.**



**Figure 5. Overview of the State-owned land at KTA and the broad geographical area, shown on 2020 aerial imagery.**

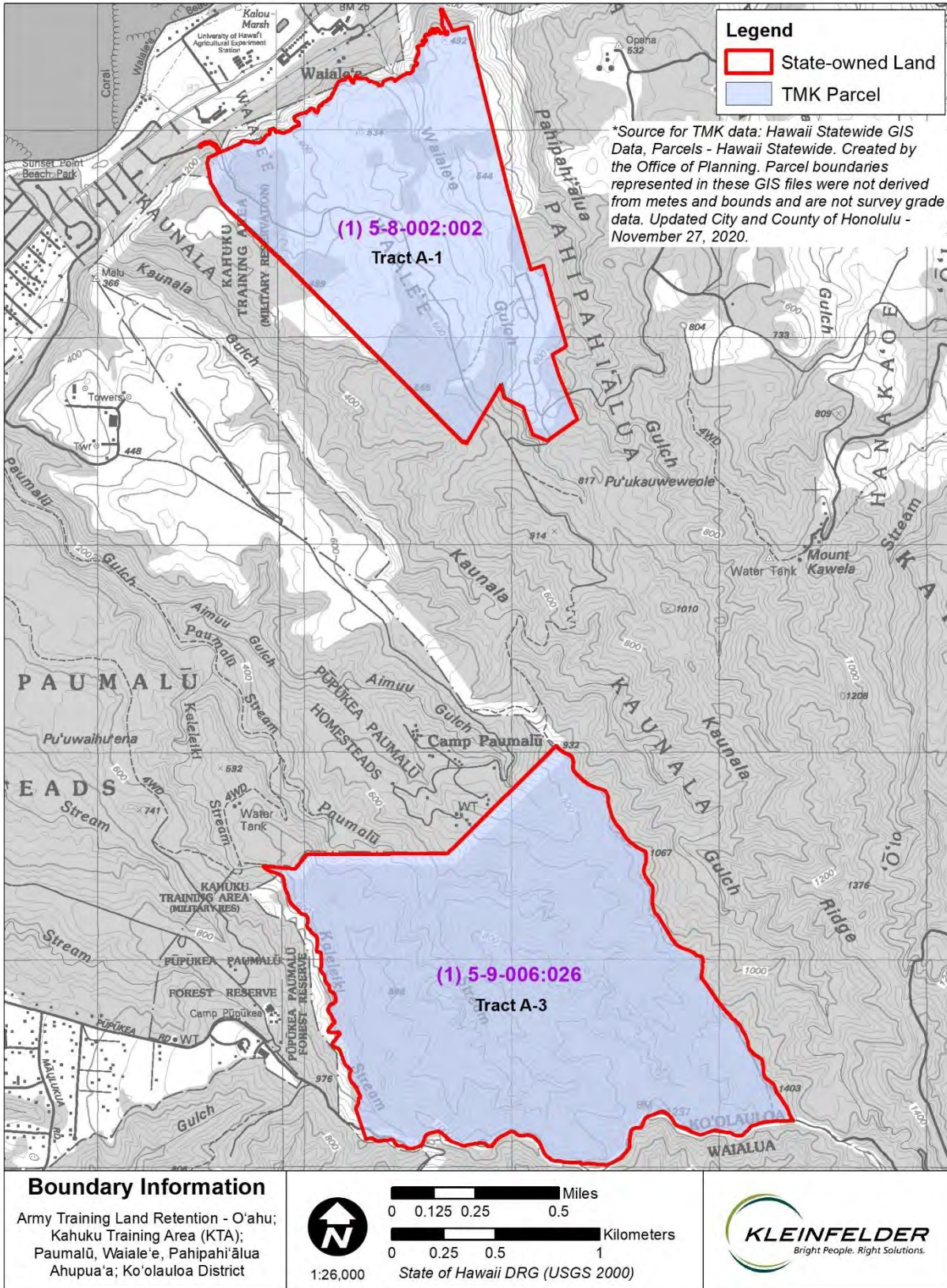


Figure 6. TMK and Tract information within the State-owned land at KTA.

#### **4.1.1.1 Wai**

Important elements of Hawaiian ethnoecology include 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. Six freshwater sources are located within the KTA project area: 'Aimu'u Gulch, Kaleleiki Stream, Kawaipi Stream, Pahipahi'ālua Gulch, Paumalū Gulch, and Waiale'e Gulch (Figure 7).

The Pahipahi'ālua and Waiale'e Gulches are associated with KTA Tract A-1, with Pahipahi'ālua Gulch sharing the eastern boundary of Tract A-1. Waiale'e Gulch cuts through the project area and joins Pahipahi'ālua Stream at the shoreline between Kaunala Beach and Kawela Bay. 'Aimu'u Gulch, Paumalū Gulch, Kaleleiki Stream and Kawaipi Stream are located within KTA Tract A-3. All of these freshwater sources start within the project area with 'Aimu'u Gulch, Kaleleiki Stream, and Kawaipi Stream combining into Paumalū Stream approximately 1.5 kilometers northeast of Tract A-3.

#### **4.1.1.2 Rains**

No specific rain names were identified for the KTA project area.

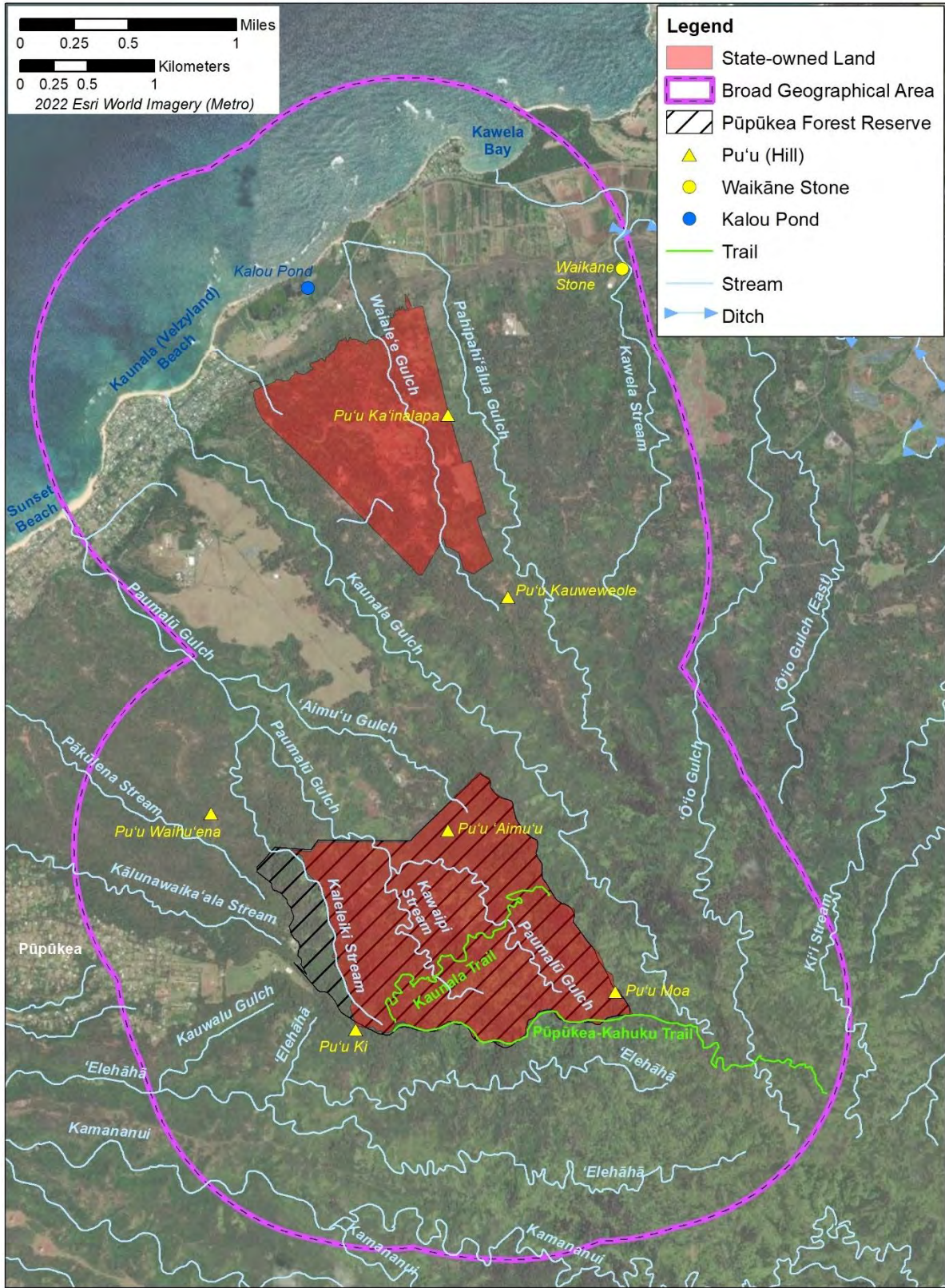
#### **4.1.1.3 Winds**

Ahamanu and Ihuanu are winds that may be associated with the KTA project area. Wind names are capitalized and considered proper names, and their literal definitions and mo'olelo are discussed below.

Ahamanu is a traditional wind name in Kahuku. According to Tēvita Ka'ili, a resident of Kahuku Ahupua'a, cultural anthropologist with a specialty in Pacific cultures, and Cultural Advisor for the Kahuku Community Association, Ahamanu, or 'Ahamanu, means "the gathering of the manu, birds" (DOFAW 2015:5):

Note that Ahamanu, the name of the wind of Kahuku, is probably a reference to the role of the makani/wind in gather ('aha) bird (manu) to Kahuku. . . These birds and bats are vital to our ecology and they are also highly significant to Polynesian cultures. Many of these beautiful winged creatures are acknowledged in the Hawaiian Creation Chant Kumulipo and other Polynesian creation stories as indigenous, as ancestors, as protectors, as creators, and as our elders. Some are 'aumākua (ancestral guardians), makua (parental birds), keiki (children of parent birds), kia'i (guardian/caretaker birds), and others are kinolau (body forms) of principal ancestors in Oceania. Tonight, we are discussing manu, winged creatures, which are all highly significant to Hawaiian and other Polynesian cultures . . .

According to Pukui and Elbert (1986:95), Ihuanu is the name given to the wind blowing upland from Kawela and means "cold nose."



**Figure 7. A sample of geological names and place names within the State-owned land at KTA and the broad geographical area.**

#### 4.1.1.4 Pu'ū

As defined by Pukui and Elbert (1986:358), pu'ū is a “. . . hill, peak, cone, hump, mound, bulge, heap, pile . . .” For the purposes of this CIA, researched pu'ū 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'ū 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. There are four pu'ū within the broad geographical area of KTA project area: 'Aimu'ū, Ka'inalapa, Kauweweole, Ki, and Moa (see Figure 7). Three of these pu'ū ('Aimu'ū, Ka'inalapa, and Moa) are located within the project area.

Pu'ū Ka'inalapa and Pu'ū Kauweweole are associated with KTA Tract A-1. Pu'ū Ka'inalapa is within Tract A-1, along the Waiale'e/Pahipahi'ālua Ahupua'a boundary and approximately 840 meters southeast of the northeast corner of Tract A-1. Pu'ū Kauweweole is outside of the KTA project area, approximately 310 meters southeast of the southern border of Tract A-1. Pu'ū 'Aimu'ū and Pu'ū Moa are within Tract A-3. Pu'ū 'Aimu'ū is approximately 150 meters south of the northern boundary, and Pu'ū Moa sits approximately 200 meters northwest of Tract A-3 southeast corner, which is also the corner of the Pūpūkea Forest Reserve. Pu'ū Ki is located just outside the southwest corner of Tract A-3 and is visible on historical maps from the 1920s through the early 1950s. Archival research on the four pu'ū located within the KTA project area and the broad geographical area did not find any cultural resources, practices, or beliefs connected to these pu'ū.

#### 4.1.1.5 Traditional Plants

Plant species with a connection to cultural practices and beliefs have been recorded within the KTA project area. Koa (*Acacia koa*), 'ōhi'a lehua (*Metrosideros polymorpha*), 'ūlei (Hawaiian hawthorn, *Osteomeles anthyllidifolia*), and uluhe (false staghorn fern, *Dicranopteris linearis*) are present in KTA Tract A-3, while kiawe (algaroba tree, *Prosopis pallida*) forest and scrubland is present within KTA Tract A-1 (USGS 2016). Plant descriptions and cultural uses for these plants are described below.

Koa (*Acacia koa*) is an endemic Native Hawaiian plant with many traditional uses, most notably in ancient Hawai'i for canoe making. Besides the hull, koa wood was also used to create canoe thwarts, seats, and paddles (Krauss 1993:50, 52; Abbott 2019:80, 83). When choosing a tree, builders would observe the behavior of the 'elepaio (O'ahu monarch flycatcher, *Chasiempis ibidis*), a native forest bird representing Lea, the female deity of canoe makers (Krauss 1993:48). If the 'elepaio moved along a felled koa tree without stopping, the builders knew it was sound enough for canoe making; however, if the 'elepaio stopped and pecked at the bark, the trunk was considered flawed as it was likely infested with insects and unusable (Krauss 1993:48). Additionally, koa wood was used to make spears, surfboards, 'umeke lā'au (containers made from wood), and other utensils; however, it was not used for poi containers as koa was

known to give poi a bitter taste (Handy and Handy 1991:8; Abbott 2019:88). Medicinally, koa bark, when mixed with 'ōlena (turmeric, *Curcuma domestica*) and 'ōhi'a 'ai (mountain apple, *Syzygium malaccense*) tree bark, was consumed to clean the blood (Krauss 1993:102).

'Ōhi'a lehua (*Metrosideros polymorpha*) is a Native Hawaiian plant whose wood was used for construction and canoe making, including canoe spreaders, gunwales, and decking (Krauss 1993:50; Abbott 2019:81). Its straight trunk made it ideal for the framing of homes, rafters, and roofing support posts and poles (Abbott 2019:68). When preparing tapa (kapa), 'ōhi'a lehua was used to create lā'au kahi wauke (scrapping board); these boards separated the outer and inner bark of the wauke (paper mulberry, *Broussonetia papyrifera*) plant (Krauss 1993:61). In heiau, 'ōhi'a lehua was used to create images and lele (offering stands) (Krauss 1993:118–119), as its use in this ceremonial setting represented Kūka'ōhi'alaka, a legendary 'ōhi'a lehua tree with a red flower on its eastern branch and a white flower on its western branch (Abbott 2019:117). Musical instruments and lei were also constructed using 'ōhi'a lehua (Krauss 1993:77, 80; Abbott 2019:126–127).

'Ūlei (Hawaiian hawthorn, *Osteomeles anthyllidifolia*), also known as eluehe, is a native shrub with edible berries that were eaten on journeys (Krauss 1993:16). The wood of the 'ūlei was used to create various musical instruments and tools, including those used for farming and fishing, such as frames for small bag nets, scoop net handles, and light spears (Krauss 1993:37, 45, 80; Abbott 2019:84). Lei was made with the berries of this shrub mixed with other plants and leaves (Krauss 1993:77); its “tiny leaves, rose-like flowers, and pinkish fruit were prized for lei wili” (Abbott 2019:126). 'Ūlei javelins and darts were used in throwing games, and spears made from the shrub's wood were used for fencing (Krauss 1993:94–95).

Uluhe (false staghorn fern, *Dicranopteris linearis*) is a common fern in Hawai'i's forests and grows in dense mats (NPS 2022). A traditional use for the fern includes weaving it into lei (Bishop Museum 2022), and the fern was also made into a liquid that was used to cure constipation (NPS 2022).

Kiawe (algaroba tree, *Prosopis pallida*) is a non-native tree that has been used in agriculture and construction since the 1890s (Gallaher and Merlin 2010:496, 504). In 1828, the first kiawe tree was reportedly planted on O'ahu by Father Alexis Bachelot, a French Catholic priest who was tasked with establishing the first Catholic mission in Hawai'i. By the 1890s, kiawe was used for fuel wood, fence posts, and cattle feed (Gallaher and Merlin 2010:504).

#### **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 man-made 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. The meaning of specific place names within the KTA project area and the broad geographical area are described below and their locations are shown on Figure 7.

- 'Aimu'u: Although not translated, taking the words "'ai" and "mu'u" separately could mean "to eat" "the second generation of taro" (Pukui and Elbert 1986:9, 256).
- 'Elehāhā: According to Pukui et al. (1974:27), 'Elehāhā, a tributary of Waimea Stream, means "black stalk (of a taro)."
- Kahuku: According to Pukui et al. (1974:67), Kahuku means "the projection," and according to Handy and Handy (1991:462) it means "the hillock."
- Ka'inalapa: No translation found.
- Kaleleiki: According to Pukui et al. (1974:76), Kaleleiki means "the short leap."
- Kalou: According to Pukui et al. (1974:78), Kalou means "the hook."
- Kālunawaika'ala: According to Pukui et al. (1974:79), the stream of "Kā-luna-wai-Ka'ala" means "water from the heights [of] Ka'ala."
- Kaunala: According to Pukui et al. (1974:95), Kaunala means "the plaiting."
- Kauwalu: No translation found.
- Kawela: According to Pukui et al. (1974:99–100), Kawela means "the heat."
- Kauweweole: No translation found.
- Kawaiپی: No translation found.
- Ki: Possibly meaning the ti (*Cordyline terminalis*) plant (Pukui and Elbert 1986:145).
- Moa: According to Pukui and Elbert (1986:248), moa has numerous meanings, including "chicken", "native banana fruit with large and plump skin", and "tufted, green, leafless plants (*Psilotum nudum* and *P. complanatum*)."
- 'Ōpana: According to Pukui et al. (1974:171), 'Ōpana is "perhaps related to 'ōpā, squeeze."
- Pahipahi'ālua: According to Andrews (1922:664), "Pahipahialua" means "double edged cutting instrument."
- Paumalū: According to Pukui et al. (1974:179–180), Paumalū means "taken secretly (a shark bit off the legs of a woman who caught more squid than was permitted; Sterling and Summers [1978:145])." It could also be translated as "taken by surprise" (McAllister 1933:151). See Section 4.1.2.2 for discussion on Paumalū's associated mo'olelo.
- Pūpūkea: According to Pukui et al. (1974:195), Pūpūkea means "white shell."



- Waiale‘e: According to Andrews (1922:672), “Waiale‘e” means “bounding water.”
- Waihu‘ena: No translation found.
- Waimea: According to Pukui at al. (1974:225–226), Waimea means “reddish water (as from erosion of red soil).”

Traditional Hawaiians managed the landscape by dividing it into various moku, watershed or other geographically bounded areas (ahupua‘a), and kin-based plots or subdivisions of an ahupua‘a (‘ili), among others. These land divisions (called “Mokuna” for the current study) help elucidate different ways of contextualizing cultural resources, practices, and beliefs within the cultural landscape.

The KTA project area is situated within the ahupua‘a of Pahipahi‘ālua, Paumalū, and Waiale‘e in the moku of Ko‘olauloa. Mapping of the area extends as far back at the late 1800s (Figure 8). KTA Tract A-1 is mostly located within Waiale‘e Ahupua‘a with a small sliver of land within Pahipahi‘ālua Ahupua‘a. Kaunala Ahupua‘a lies to the west of Waiale‘e, and ‘Ōpana 2 and Kawela Ahupua‘a lie to the east of Pahipahi‘ālua (see Figure 4).

KTA Tract A-3 is located solely within Paumalū, an ahupua‘a adjacent to Pūpūkea, Waimea, and Kaunala Ahupua‘a. The Kaunala Gulch and Ridge run along the eastern border of the project area, and KTA Tract A-3 is located entirely within the Pūpūkea Forest Reserve.

#### 4.1.2.2 Mo‘olelo

The KTA project area and the broad geographical area have associated mo‘olelo that explain the history and meaning behind their names. KTA shares its name with the nearby town of Kahuku. The mo‘olelo associated with this place name include references to unstable land, hala (screw pine, *Pandanus tectorius*) trees, and an underground stream.

Kahuku ‘āina lewa.

*Kahuku, an unstable land.*

O‘ahu, according to legend, was once two islands that grew together. Kahuku is the part that bridges the gap. [Pukui 1983:144]

Nani i ka hala ka ‘ōiwi o Kahuku.

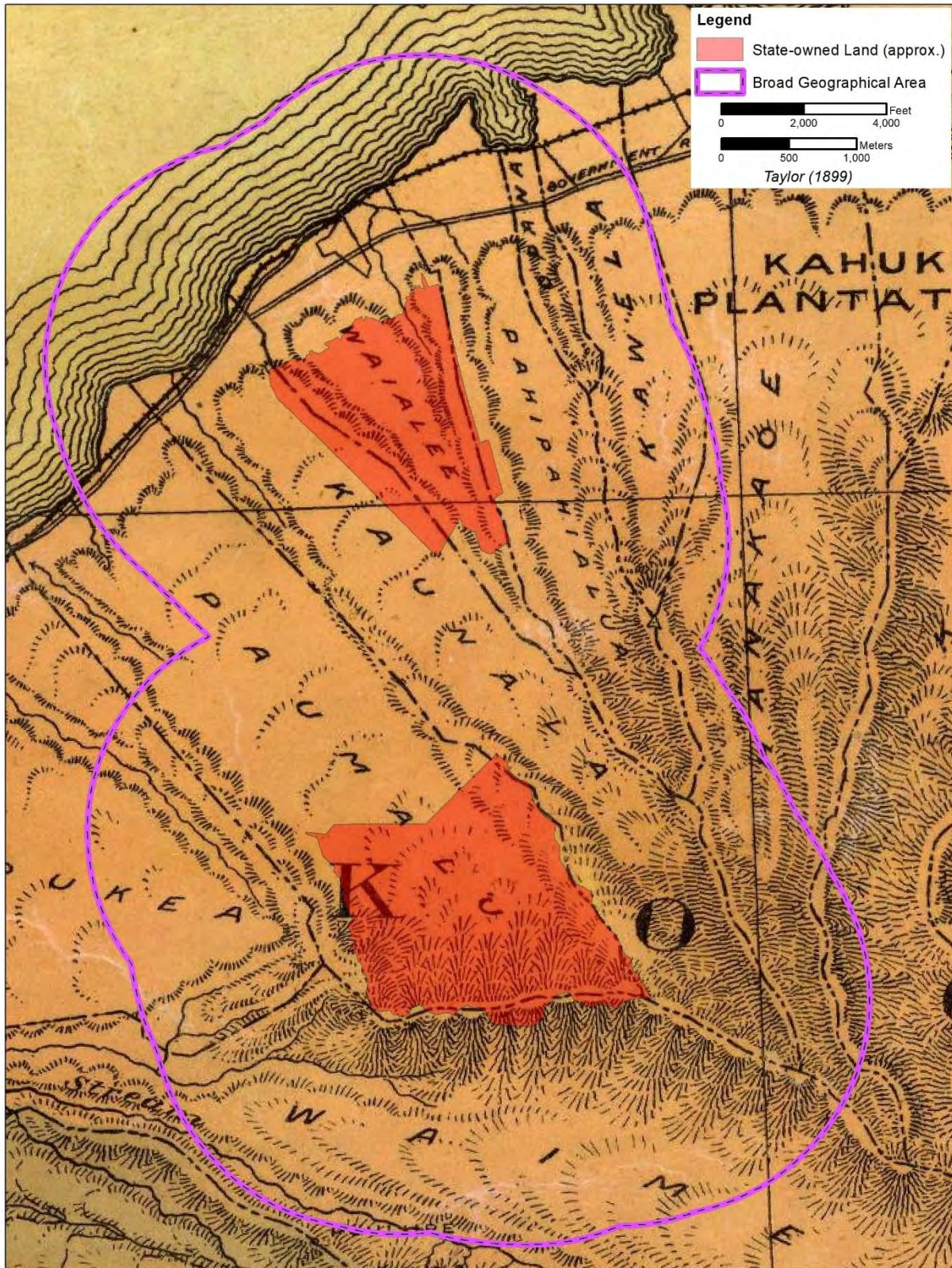
*The body of Kahuku is beautified by hala trees.*

Refers to Kahuku, O‘ahu. [Pukui 1983:248]

Pukana wai o Kahuku.

*The water outlet of Kahuku.*

Refers to the outlet of an underground stream that once flowed from Kahuku to Waipahu, O‘ahu. [Pukui 1983:299]



**Figure 8. 1899 Taylor map showing the State-owned land at KTA and the broad geographical area.**

A fishpond, called Kalou, was recorded approximately 425 meters (0.26 miles) north of the KTA project area (within the broad geographical area). According to McAllister (1933:152):

Said to have been in its best condition when Kaluhi was konohiki (a man in charge of a land division) of this district. There was formerly a “Kane stone” in the immediate vicinity. This is also the place where Kahuku is attached to Waialeale.

Another fishpond was located within Pahipahi’ālua Ahupua’a, on the Waimea side of Kawela Bay, approximately 1,200 meters (0.75 miles) northeast of the KTA project area (within the broad geographical area). It was a small loko wai (freshwater fishpond) known as Kāpi or Punaulua. McAllister (1933:152) related this story told him about the fishpond and the nearby fishing shrine called “Pahipahialua”:

There were once gathered on the beach near this site a great many people. This was long before Europeans had come and when there were not many Hawaiians, so that a gathering of this size was enough to occasion the comments of a stranger who approached. This was Kane, but the people did not recognize him. “Why are so many of you gathered here?” he inquired. “To catch the oio. A large school swims near in the water,” they replied. “Those are not oio,” said Kane, “they are eel.” But the people only laughed. Certainly they knew oio when they saw them. Who was this stranger to dispute the words of kamaainas? So Kane wagered that they were eel, and the people wagered against him. The canoes with the long, large nets were launched and the school surrounded. Great was their surprise when they found the fish to be eel. Who could this strange man be? That evening Kane accompanied them up to the mountains. It was a long trip up the valley to reach the springs of fresh water, and the people were tired. They stopped at the entrance of the valley for rest, and here in the presence of all the people, Kane struck the stone known as Waikane, from which water immediately poured forth and has been flowing almost to this day.

Apparently Kane, who was joined by Kanaloa, live at Opana for some time, for just outside of Kawela Bay there are rocks, horseshoe in shape and known as Papaamui, where these brothers were wont to scoop for fish. Near the beach and in line with Waikane was the fishing shrine (ko’a) called Pahipahialua.

Within the KTA project area, Paumalū Gulch is the only location with an associated mo’olelo. The name Paumalū comes from its mo’olelo that involves a woman known for her ability to catch squid and a shark (McAllister 1933:151):

. . .She went down to the beach at the place designated by the chief, but before she entered the water an old man met her. He told her the rules of the place: she was supposed to catch only a certain number and when she had caught them to go home, or something would be sure to happen to her. She called for her daughter who had followed and told her to come with her into the water. Another thing the old man had said was for her to go home when she said she would and not to stop for anything. The lady caught all she had been allowed by the old man, but she kept on fishing until she had more than she could handle. She sent her daughter to the shore with half of the load and told her she was going home, but instead she remained, for she saw a

huge squid she wanted to get. Just then a large shark came and bit off her legs. She yelled for help. Her daughter came to her rescue, but too late. She died from the loss of blood and the shock.

When the people examined her later they found one deep gash on her right arm made by one of the shark's teeth. They then knew that it was done by a shark who guarded that particular reef. After that incident they named the place Paumalu, which means, "taken by surprise."

#### **4.1.2.3 Archaeological Sites**

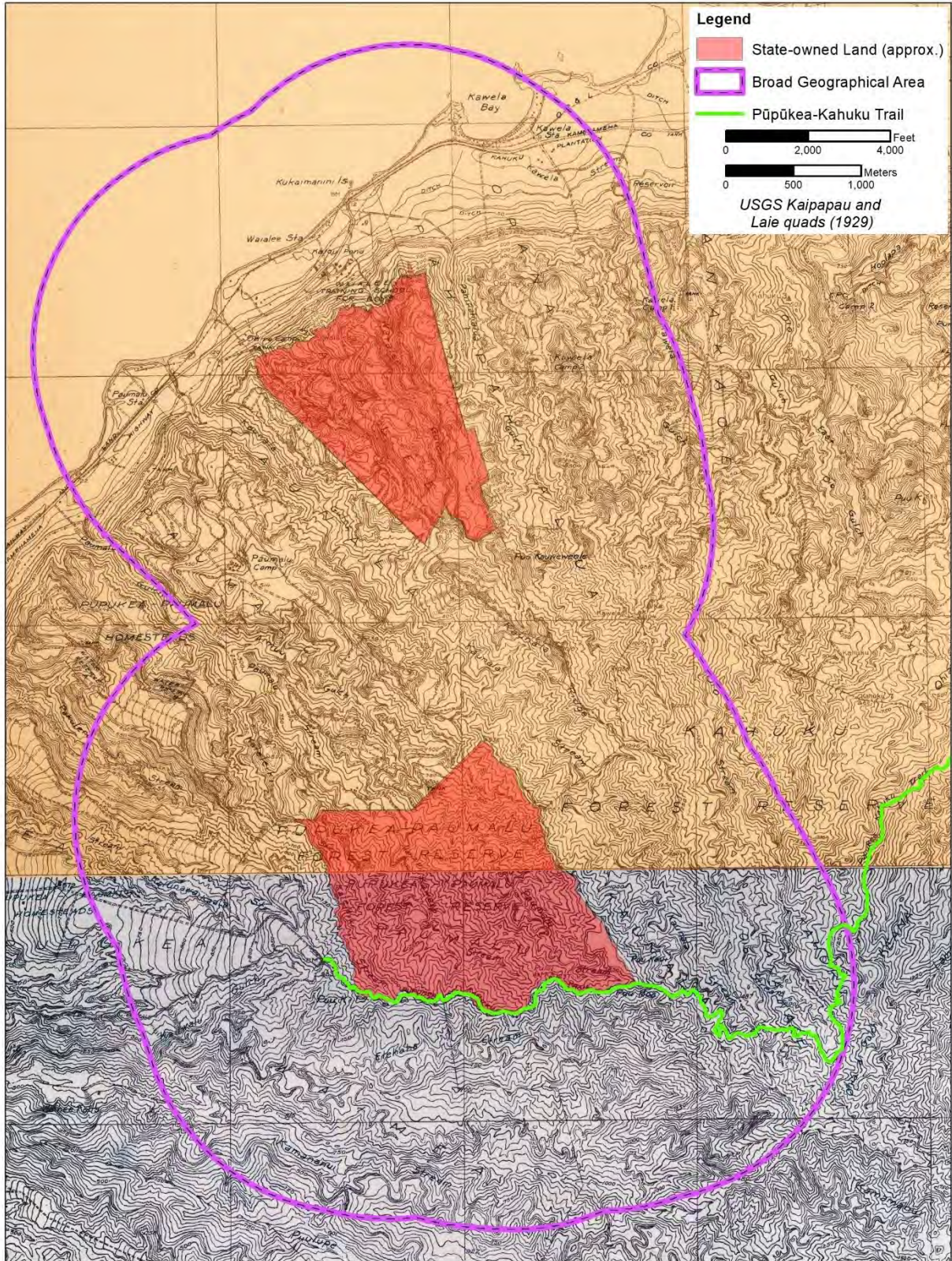
Two archaeological sites are documented within the KTA project area: Sites 50-80-02-4887 and 4888. Site 4887 is a Hawaiian habitation site located within KTA Tract A-1 between Kaunala and Waiale'e gulches. The site contains 11 surface features constructed of stacked basalt boulders that include "five terraces, one rock alignment, two circular alignment [sic], one depression, one enclosure, and one boxed C-shape structure" (Williams and Patolo 1998:64). One of the terraces was likely a house site with the remaining terraces related to agricultural or structural functions; the enclosure was likely an animal pen; and the earthen depression was likely a cooking area. This residential site most likely dates to the pre-Contact to early post-Contact period (Williams and Patolo 1998:72–73).

Site 4888 is a possible agricultural site located on a knoll within Paumalū Stream in the KTA Tract A-3. The site contains a short boulder alignment and a series of earthen depressions. The largest of these depressions contained charcoal and was a possible imu (earth oven), but the charcoal was not tested to confirm age. The site area was noted for extensive erosion and weathering (Williams and Patolo 1998:73–74).

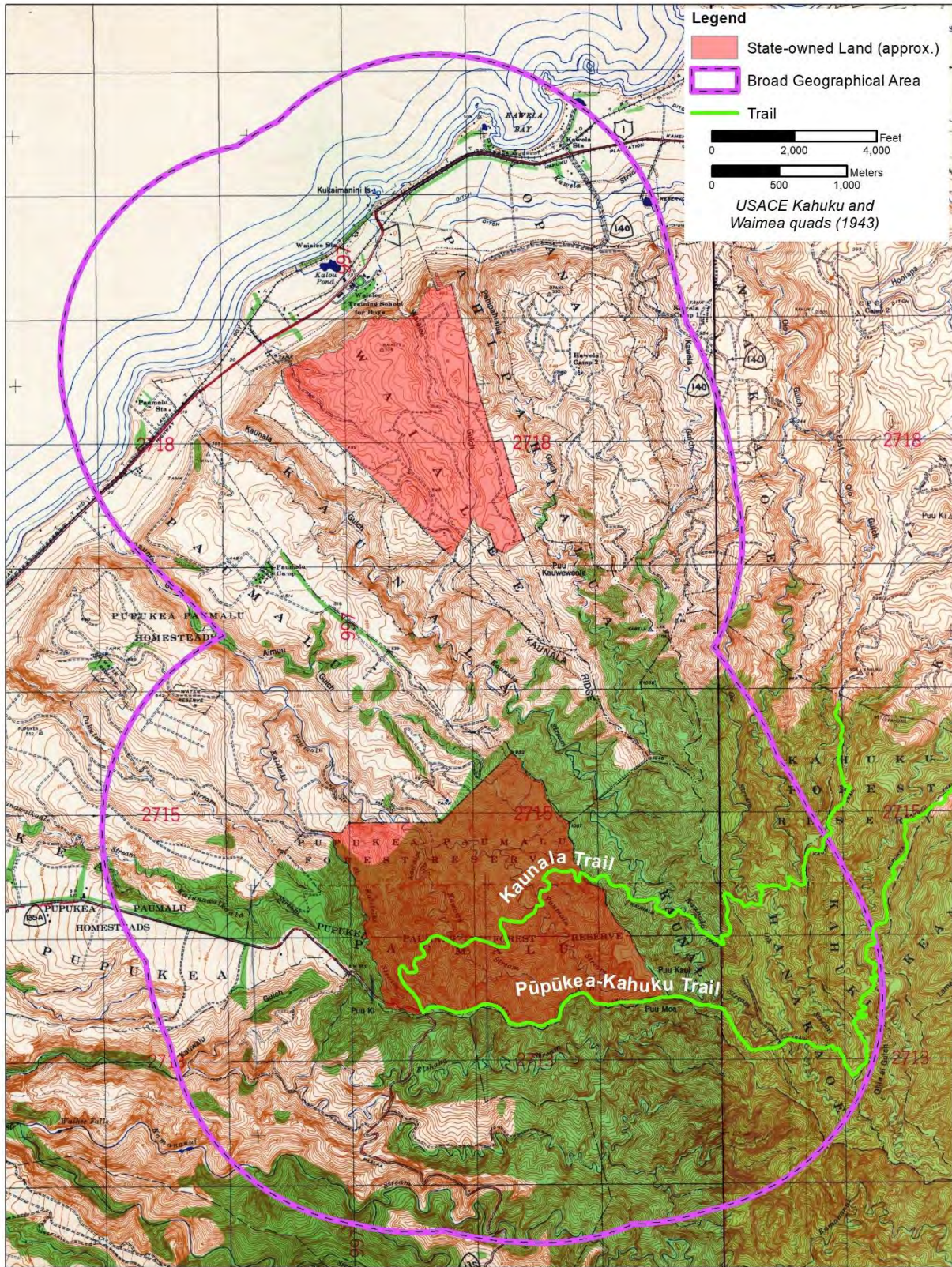
In addition to the two archaeological sites, isolated pre-Contact Hawaiian artifacts have also been documented within the State-owned land, including a basalt adze fragment near Site 50-80-02-6972 and a basalt flake at Site 50-80-02-6981 (Patolo et al. 2010:138).

#### **4.1.2.4 Trails**

According to historical maps dating from 1929 and 1943, the Pūpūkea-Kahuku Trail, also known as the Pūpūkea Summit Trail, runs along the southern border of the Pūpūkea Forest Reserve, which is part of KTA Tract A-3 (Figure 9 and Figure 10). The Army built the initial section of this trail in the early 1920s, then between 1934 and 1936 the Civilian Conservation Corps rebuilt the Army section and extended it along the Ko'olau Range to its current 4.5-mile length (Ball 2000:259). Even though this is a historically built trail, it may have originated from traditional use; however, there is no recorded evidence of traditional use for the trail.



**Figure 9. 1929 USGS Kaipapau and Laie quads showing Pūpūkea-Kahuku Trail along southern border of KTA Tract A-3 and numerous unimproved roads within KTA Tract A-1.**



**Figure 10. 1943 USACE Kahuku and Waimea quads showing Pūpūkea-Kahuku and Kaunala trails within and adjacent to KTA Tract A-3.**

Kaunala Trail is shown going through KTA Tract A-3 starting with the 1943 USACE map (see Figure 10). This 2.5-mile trail begins in the southwest corner of the project area, traversing the ridgelines, crossing Kawaiipi and Paumalū Streams before exiting the eastern boundary of Tract A-3. The trail was built in 1933 by Territorial Forestry “to provide access to the Pupukea section of the Paumalu Forest Reserve for reforestation efforts” (DOFAW 2022a). This Pūpūkea Forest Reserve was “established by Governor’s Proclamation on May 10, 1910, to protect the forest and increase the flow from several small springs and waterholes” (DOFAW 2022b). This trail is still in use today for hiking, biking, and camping, and it traverses a public hunting area (Department of Land and Natural Resources [DLNR] 2022a). There is no recorded evidence of traditional use of this trail.

### **4.1.3 Archival History**

The history of the KTA project area provides important detail 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.

#### **4.1.3.1 Traditional Historical Context**

Waiale‘e Ahupua‘a, which encompasses most of KTA Tract A-1, once had a small group of ancient terraces outside the project area known as Kāne-ali‘i (Handy and Handy 1991:462–463). These terraces were abandoned due to a lack of water (Handy 1940:88). A local informant named Judge Rathburn confirms this, as he recalled no terraces along Pahipahi‘ālua Stream but noted terraces outside but in the broad geographical area of the project area (Handy 1940:88):

. . . a small group of terraces formerly known as Kanealii, now abandoned for lack of water, around the house of Mrs. John Baker, just east of the Boys’ Industrial School and inland of Kamehameha Highway. The large terraces now cultivated seaward of the Industrial School are of recent construction.

There is an archaeological site (Site 4887) within KTA Tract A-1 between Kaunala and Waiale‘e gulches that contains features indicative of a Hawaiian habitation site with terraces related to agricultural or structural functions (see Section 4.1.2.3), indicating such activities took place within the project area.

Historically, Handy and Handy (1991:463) stated there were no terraces within the gulches or streams within the ahupua‘a of Paumalū, where KTA Tract A-3 is located, and Pupukea; however, there is an archaeological site (Site 4888) within KTA Tract A-3 that indicates there may have been agriculture in the gulches of Paumalū Ahupua‘a.

#### **4.1.3.2 Post-Contact and Kingdom History**

There are few Early European accounts of the northern coast of O‘ahu, including Kahuku and the shoreline within the broad geographical area of the KTA project area, and the accounts often pose conflicting

information about the socio-environmental conditions of these areas . The earliest European account of the northern coast of O‘ahu comes from Charles Clerke, who assumed command of the H.M.S. Resolution following Captain Cook’s death in 1779 (Beaglehole 1967:572, Part One, Vol. III):

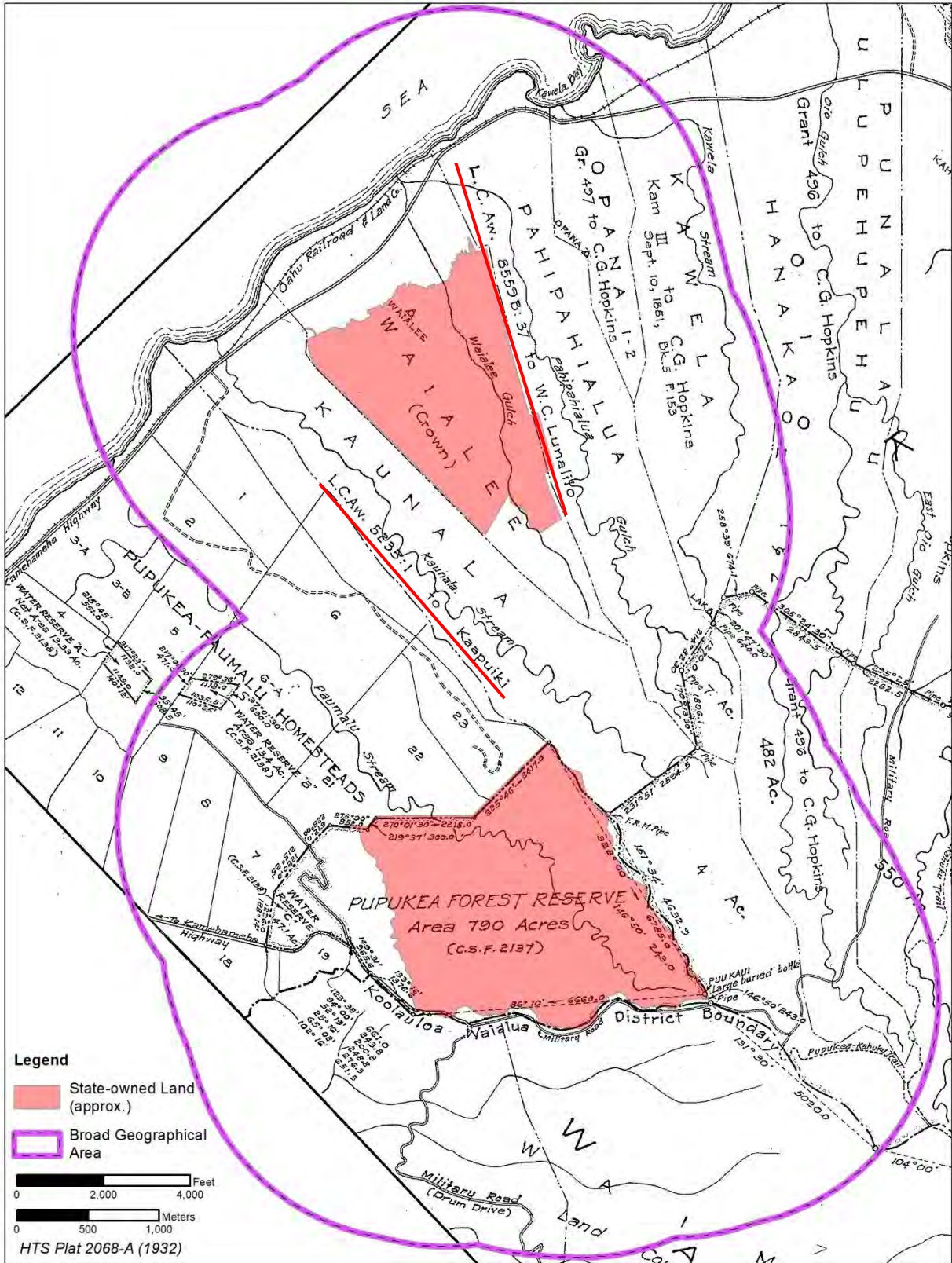
Run round the Noern [northern] Extreme of the Isle [O‘ahu] which terminates in a low point rather projecting [Kahuku Point]; off it lay a ledge of rock extending a full Mile into the sea, many of them above the surface of the water; the country in this neighborhood is exceedingly fine and fertile; here a large Village, in the midst of it run up a large-Pyramid doubtlessly part of a Morai.

An observation by Captain George Vancouver fifteen years later conflicts with Clerke’s account. Vancouver describes a land that did not appear to be flourishing and lacked a sufficient population (Vancouver 1978, Vol 3:7). John Papa ‘Ī‘Ī, similarly, conflicts with Vancouver’s account in describing the Waiale‘e area as, “a delightful land, well provisioned”, and noted, “[t]here was a pond there, surrounded by taro patches, and there were good fishing places inside the reef” (‘Ī‘Ī 1983:24).

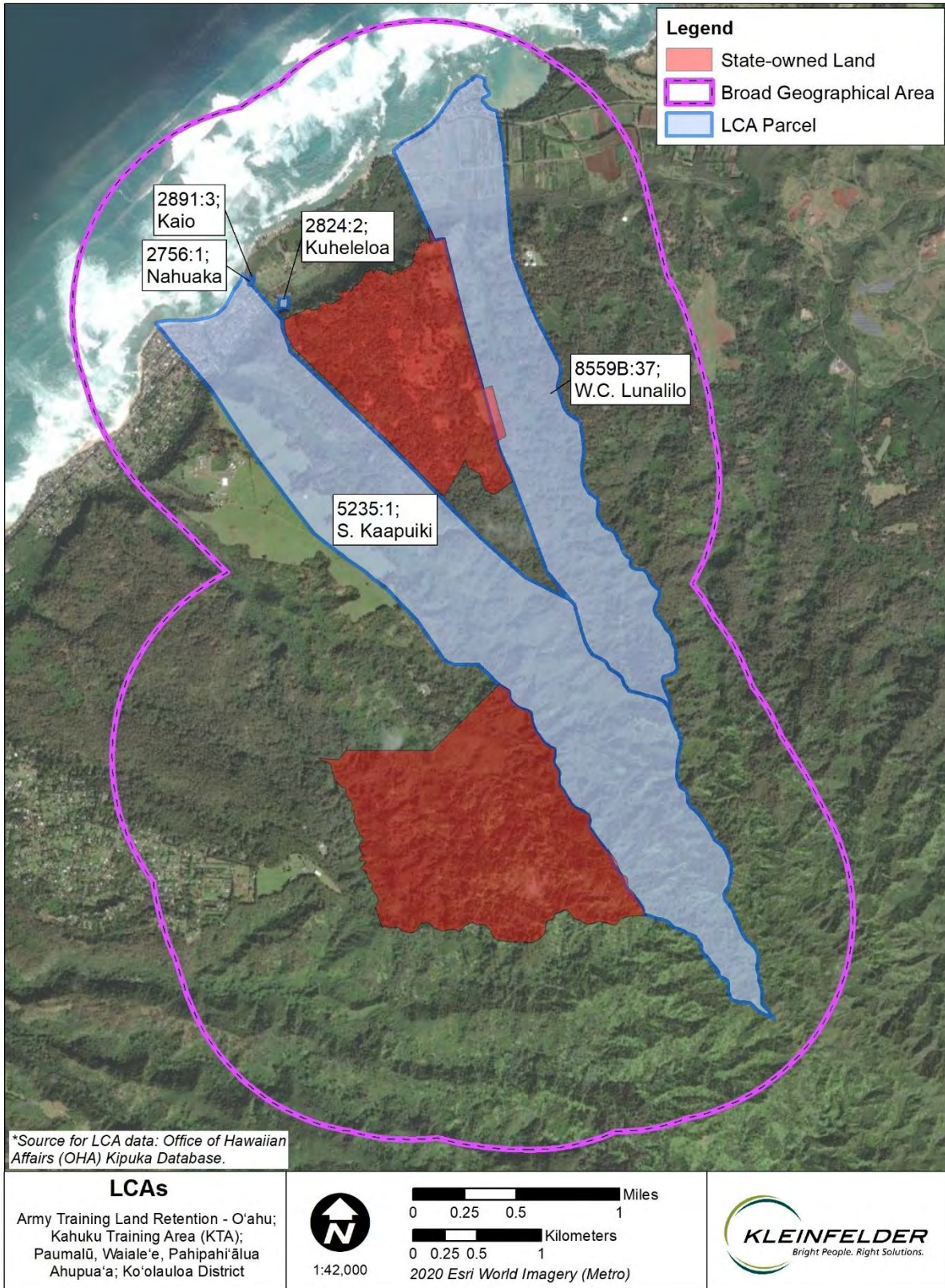
During the Māhele ‘Āina, the land at Waiale‘e and a portion of Paumalū was retained by the Crown; however, one LCA was awarded within the KTA project area. Approximately ten acres of KTA Tract A-1 falls within a portion of Pahipahi‘ālua Ahupua‘a; this entire 950-acre ahupua‘a was awarded to William C. Lunalilo under LCA 8559B:37, but the claim does not specify specific land use (Figure 11). In the broad geographical area, four LCAs (LCAs 2756:1, 2824:2, 2891:3, and 5235:1) were awarded within Waiale‘e and Kaunala Ahupua‘a. LCAs 2756:1, 2824:2, and 2891:3 were awarded north of the KTA Tract A-1. The closest of these to the KTA project area was awarded to Kuhелеloa under LCA 2824:2 and is located less than 100 meters from the northern border of KTA Tract A-1 within Waiale‘e Ahupua‘a. LCA2756:1, located approximately 375 meters from the northern border of KTA Tract A-1 within Waiale‘e and Kaunala Ahupua‘a, was awarded to Nahuaka; and LCA2891:3, located approximately 400 meters from the northern border of KTA Tract A-1 within Waiale‘e Ahupua‘a, was awarded to Kaio. Lastly, there was one large 1,384-acre LCA (LCA 5235:1) awarded to S. Kaapuiki in Kaunala Ahupua‘a, located along the western border of KTA Tract A-1 and the eastern border of KTA Tract A-3. LCAs within the KTA project area and the broad geographical area are shown in Figure 12 and Table 1.

LCA records, accessed through the OHA’s Kipuka database, indicate that habitation was occurring primarily along the coastal flatlands and that residents engaged in both irrigated agriculture and dryland agriculture. Cultigens mentioned within the broad geographical area include kalo, ‘uala, mai‘a, wauke, and kō. One record also claimed an individual koa tree was used specifically for canoe building.





**Figure 11. Portion of 1932 HTS Plat 2068-A showing LCA information within the State-owned land at KTA and the broad geographical area, including LCAs 5235:1 and 8559B:37 (underlined in red).**



**Figure 12. LCAs within the State-owned land at KTA and the broad geographical area, shown on 2020 aerial imagery.**

**Table 1. LCAs Within the State-owned Land at KTA and the Broad Geographical Area**

LCA NO.	AWARDEE	LOCATION	ACRES	DESCRIPTION
2756:1	Nahuaka	Waiale'e, Kaunala	0.37	One house lot and a garden of wauke, bananas, and sugarcane.
2824:2	Kuheleloa	Waiale'e	2.04	Three 'āpana, including one house lot, five lo'i, a sweet potato garden, and a banana garden.
2891:3	Kaio	Waiale'e	0.18	Mentions bananas and one koa tree for canoe building.
5235:1	Kaapuiki, S.	Kaunala	1384.00	Part of a large, multi-parcel claim. No land use history described.
8559B:37*	Lunalilo, William C.	Pahipahi'ālua	950.00	Part of a large, multi-parcel claim. No land use history described.

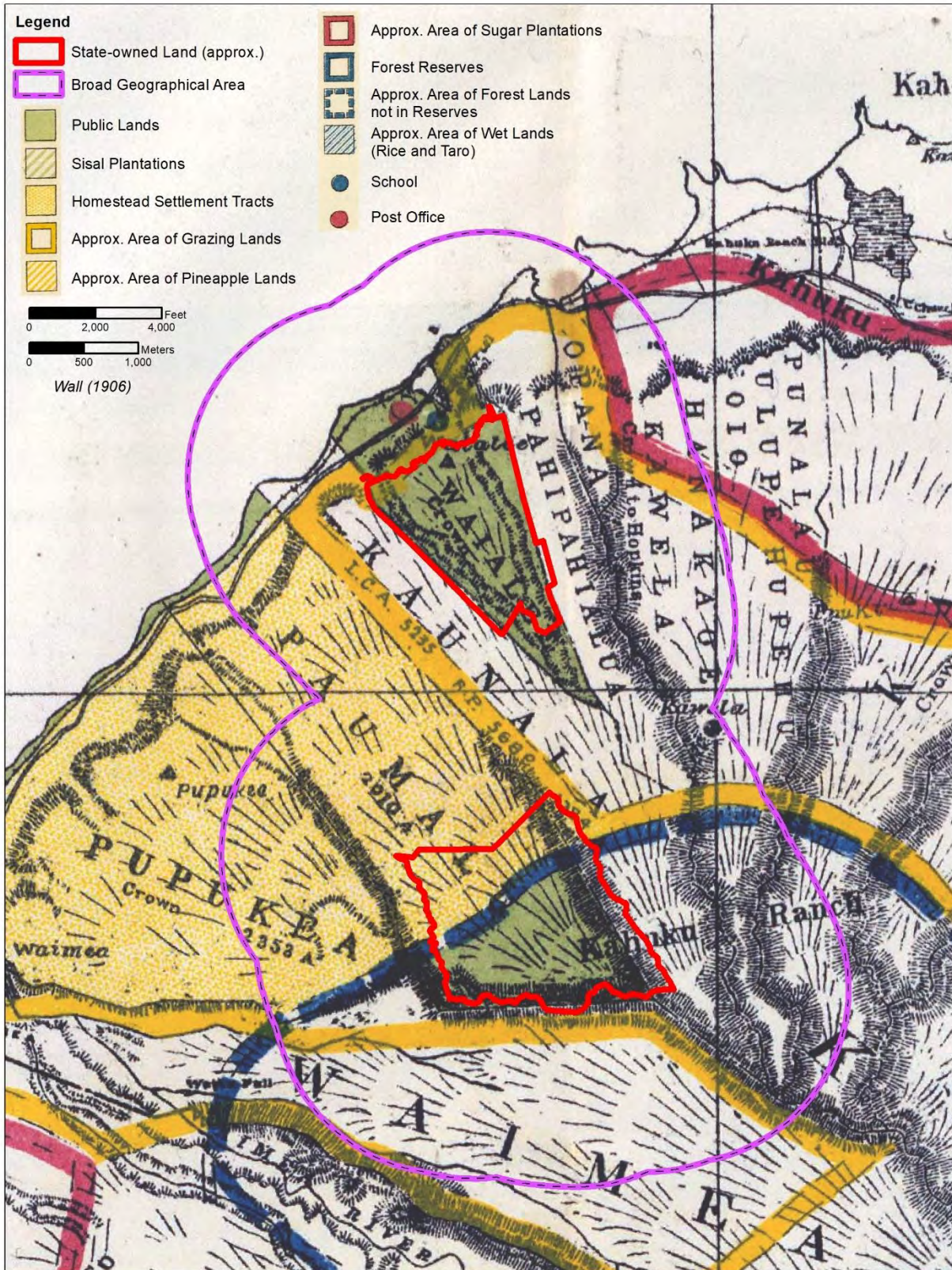
\* Approximately ten acres of KTA project area within LCA.

#### 4.1.3.3 Agricultural and Subsistence History

The Māhele 'Āina spurred agricultural development in the broad geographical area of the KTA project area, including some of the earliest plantations on O'ahu (see Figure 8). These plantations would become an important source of income for the area from the mid-nineteenth century through the mid-twentieth century. An "area of sugar plantations" is shown on a 1906 Hawaii Territory Survey map east of the KTA project area and within the broad geographical area (Figure 13).

According to a 1906 Hawaii Territory Survey map, KTA Tract A-1 was in an area designated as "grazing lands," likely used by cattle and sheep farmers, and was almost entirely within public lands, except for approximately ten acres within Pahipahi'ālua Ahupua'a (Figure 13). The southern portion of KTA Tract A-3 was public lands/forest reserve and the northern portion of Tract A-3 was homestead settlement tracts (Figure 13). Additionally, a 1929 USGS survey map (see Figure 9) indicates unimproved roads within Tract A-1, which may have been used for agricultural or ranching purposes. By 1943, the USACE Waimea quad map shows much less of these unimproved roads (see Figure 10), which possibly indicates the agricultural aspects of this land were waning. However, the lack of unimproved roads on the 1943 map might indicate a change in mapping methods between the 1920s and 1940s and not necessarily a change in agricultural land use.

Subsistence hunting has also traditionally occurred within the project area and continues to some extent within KTA Tract A-3 in the present. According to the 2018 DOFAW hunting survey (see Section 3.8), of the 764 hunters who reported that they hunted in public hunting lands, eight percent reported that they hunted in the O'ahu "East," which includes Pūpūkea-Paumalū Forest Reserve (in which KTA Tract A-3 is located), Kaipapa'u Forest Reserve, Hau'ula Forest Reserve, 'Ewa Forest Reserve, and Kuli'ou'ou I and II (DOFAW 2018:10).



**Figure 13. Portion of Wall's (1906) map of O'ahu depicting land use at the beginning of the twentieth century within the State-owned land at KTA and the broad geographical area.**

#### 4.1.3.4 Military History

Early military endeavors along the northern tip of O‘ahu began during the 1930s with the installation of coastal defenses by the U.S. Corps of Engineers to secure and fortify the coast around O‘ahu; however, none of these activities appear to have occurred within the State-owned land at KTA (Farrell and Cleghorn 1995:7; Bennett 2016:7). In 1956, a TMK parcel (TMK [1] 5-7-002:001) bordering the eastern edge of KTA Tract A-1 was included in an expansion of KTA, when an additional 3,700 acres was leased to the U.S. Government by the California Packing Company and the James Campbell Estate (Nakamura 1981:14). KTA Tracts A-1 and A-3 have been used for military training since the execution of the 65-year lease (State General Lease No. S-3850) on August 17, 1964 (DLNR 1964a).

#### 4.1.4 Previous Ethnographic Interviews

There is one cultural study, Graves et al. (2016), located directly north of the northern border of KTA Tract A-3 and completely within the broad geographical area of the KTA project area. Graves et al. (2016) completed a CIA as part of the planning for improvements to the Paumalū Girl Scout Camp. Data from ethnographic interviews suggest Paumalū was a culturally significant area that “supported traditional subsistence activities such as fishing, agriculture, and the gathering of forest plants and ocean resources . . . the uplands of the Paumalū area were likely used for sheep and cattle ranching, while other parts of the ahupua‘a were cultivated in pineapple” (Graves et al. 2016:91). Several cultural resources located in Paumalū were identified during these interviews, including “trails, rock alignments, possible agricultural areas, possible human burials, pōhaku with special meaning, and petroglyphs at Sunset Beach (makai of the project area)” (Graves et al. 2016:91).

Informants in the Graves et al. (2016) study identified the following practices within the Paumalū Girl Scout Camp project area (Graves et al. 2016:87, 91), which are also within the broad geographical area of the KTA project area:

- Resource gathering: Native plants such as hala, loulu (native fan palm, *Pritchardia* spp.), maile (*Alyxia stellata*), ‘ohe (bamboo, *Schizostachyum glaucifolium*), mai‘a, ‘ulu (breadfruit tree, *Artocarpus altilis*), ‘iliahi (sandalwood, *Santalum* spp.), and lama trees (ebony, *Diospyros sandwicensis*).
- Possible agricultural activity (i.e., cattle ranching).

While two out of the three informants in the Graves et al. (2016) study were not aware of cultural practices/resource gathering occurring within the Graves et al. (2016) project area or surrounding areas, one informant stated in response to the question about traditional gathering practices that “there is a lot of maile, a lot of lama trees and so forth, and also, there are a lot of sandalwood trees” (Graves et al. 2016:87).

One informant mentioned the roads near the Paumalū Girl Scouts Camp seemed to have originally been used for agriculture and the land was ideal for cattle grazing; they also mentioned the military's involvement with preventing erosion due to overgrazing (Graves et al 2016:87):

. . . It seems like the original roads into that area were done for agriculture, and following, the next set of roads that went in was done both by the Army, coastal defense, and by the CCC [Civilian Conservation Corps]. There was a lot of, in the '30s, the CCC had a reforestation program to try and address some of the acute erosion problems that had been caused by overgrazing, which were actually noted in historical documents, going back as far as around 1850. So turning the cattle loose, and there's a lot of nice graze land up there, was great for beef, but not so good for the environment. So anyway, some of the earliest roads were probably ag, then CCC and military.

A mo'olelo associated with Paumalū was also shared during one interview (Graves et al. 2016:85):

There is a story of Kaiulani and Kahikilani. He cherished his lifestyle at Paumalu with its waves and surrounding area. Kaiulani won his heart by sending leis to him. One day he returned home wearing a different lei. So she broke off the relationship, and Kahikilani turned to stone.

## **4.2 ONLINE SURVEY AND INTERVIEWS**

Individuals and organizations with potential expertise and knowledge of cultural resources, practices, and beliefs relevant to the KTA project area were given an opportunity to participate in an online survey as well as one-on-one interviews. The following sections summarize the responses received during this outreach process.

### **4.2.1 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. Appendix B presents full questions and responses to this survey. The survey for the KTA project area received a total of seven respondents (note, however, that some questions were skipped and did not receive responses from all seven respondents). These respondents expressed knowledge of cultural resources, practices, and beliefs within the area and noted the following as being pertinent to the project area: the practice of sharing mo'olelo, ceremonial practices, and mālama 'āina. These are summarized below.

*Mo'olelo* referenced by survey respondents for the project area include mo'olelo of Kaleohipa and Nāwaiuolawe (associated with Kahuku Point), Ka'alaehuapī (a magical Hawaiian moorhen), and Hī'ikaikapoliopole (the youngest sister of Pele).

*Ceremonial practices* mentioned by survey respondents include the practice of celebrating Makahiki; caring for burial sites of iwi kūpuna in the area; performing female and motherly-oriented ceremonies to the deity Lewa; and burying ‘iewe (placenta).

*Mālama ‘āina* is also apparent in respondents’ mentions of intangible cultural resources of importance in the project area and the broad geographical area, such as traditionally useful plants like koa and ‘iliahi; native animal species, such as the native bat population; and the land itself as a significant cultural resource that was managed and cared for.

It is unclear how many of these cultural practices and beliefs have occurred and/or are occurring within the State-owned land at KTA 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.

#### 4.2.2 Interview Responses

One-on-one interviews were conducted with eight individuals associated with the KTA project area (Table 2). 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 D. The current section lists the cultural resources, practices, and beliefs each interviewee mentioned that pertained to the State-owned land at KTA and the broad geographical area. For a list of effects to cultural resources, practices, and beliefs from continued military activity in the KTA project area as identified by interviewees, see Section 4.4. For a list of the interviewees’ mitigation recommendations for the KTA project area, see Section 9.2.1. Biographical information for each interviewee is provided in Section 2.2.2.1.

**Table 2. Individuals Interviewed for KTA Project Area**

INTERVIEWEE	INTERVIEW TYPE
Mr. Peter Apo	Telephone
Mr. (Norman) Mana Kaleilani Cáceres	Telephone
Mr. (Nathan) Keola Grace	Telephone
Mr. Neil J.K. Hannahs	In person
Mr. Allen Hoe	Telephone
Mr. Kyle Kajihiro	Telephone
Mr. Thomas Lenchanko	Telephone
Mr. Christophor Edward Oliveira	Telephone

#### **4.2.2.1 Mr. Peter Apo**

The interview with Mr. Peter Apo was conducted by Mr. Matthew Sproat, Researcher and Interviewer from Honua Consulting, LLC, on June 15, 2022. Mr. Apo shared the following information on cultural resources, practices, and beliefs:

##### **Cultural Resources**

- Mr Apo was aware of cultural resources in KTA but did not know their specific locations.

##### **Cultural Practices and Beliefs**

- Mr. Apo has “no information or knowledge of cultural practices or beliefs associated with the KTA project area or the broad geographical area.”

#### **4.2.2.2 Mr. (Norman) Mana Kaleilani Cáceres**

The interview with Mr. (Norman) Mana Kaleilani Cáceres was conducted by Mr. Sproat from Honua Consulting, LLC on June 13, 2022. Mr. Cáceres shared the following information on cultural resources, practices, and beliefs:

##### **Cultural Resources**

- Mr. Cáceres asserted it is “important to recognize that the entire landscape is a cultural resource” “rather than looking at specific cultural resources that can be found within the KTA project area.”
- Mr. Cáceres stated there are traditional burials and iwi within the KTA project area and the broad geographical area; however, he did not provide any specific locations for these resources (note, Army records do not include any known burial sites within the State-owned land at KTA but do include known burial sites in the broad geographical area [Gross et al. 2023:46; Historical and Cultural Resources Literature Review, Appendix I to the O’ahu ATR EIS]).

##### **Cultural Practices and Beliefs**

- Mr. Cáceres mentioned that the “responsibility of caring for human remains (iwi kūpuna) is a cultural practice connected to the area” of the KTA project area; however, he did not provide a specific location where this practice was taking place.

#### **4.2.2.3 Mr. (Nathan) Keola Grace**

The interview with Mr. (Nathan) Keola Grace was conducted by Mr. Sproat from Honua Consulting, LLC on May 11, 2022. Mr. Grace shared the following information on cultural resources, practices, and beliefs:



## **Cultural Resources**

- Mr. Grace stated kalo is “a valuable cultural resource” that is grown by the Ka’io family “in the area” of the State-owned land at KTA; however, he did not provide a specific location for this kalo farming.

## **Cultural Practices and Beliefs**

- Aside from the cultural practice of kalo farming that was previously mentioned as a cultural resource, Mr. Grace was “not aware of any specific cultural practices and beliefs associated with the KTA project area.”

### **4.2.2.4 Mr. Neil J.K. Hannahs**

The interview with Mr. Neil J.K. Hannahs was conducted by Mr. Sproat from Honua Consulting, LLC on June 20, 2022. Mr. Hannahs shared the following information on cultural resources, practices, and beliefs:

## **Cultural Resources**

- Mr. Hannahs stated “there are valuable water resources in the general area” of the KTA project area, “including streams and a bog”; however, he did not provide a specific location for these resources.

## **Cultural Practices and Beliefs**

- Mr. Hannahs mentioned “there is active watershed protection going on in the general area” of the KTA project area, which extends to the “ridge level of the Ko’olau Range”; however, he did not indicate whether these protections were occurring within the State-owned land at KTA.

### **4.2.2.5 Mr. Allen Hoe**

The interview with Mr. Allen Hoe was conducted by Mr. Sproat from Honua Consulting, LLC on June 14, 2022. Mr. Hoe shared the following information on cultural resources, practices, and beliefs:

## **Cultural Resources**

- Mr. Hoe mentioned a “heiau on a bluff overlooking Waimea,” but this heiau is not within the KTA project area or the broad geographical area. He did not provide any further knowledge of cultural resources pertaining to this study.

## **Cultural Practices and Beliefs**

- Mr. Hoe was “not personally aware of any specific cultural practices and beliefs associated with the KTA project area.”

### **4.2.2.6 Mr. Kyle Kajihiro**

The interview with Mr. Kyle Kajihiro was conducted by Mr. Sproat from Honua Consulting, LLC on June 15, 2022. Mr. Kyle Kajihiro also submitted a response via email attachment on behalf of Hawai’i Peace and Justice (of which he is a Board member) and Koa Futures, a group of Hawai’i residents concerned about

the effects of military activities in Hawai'i and the Pacific Region. In his email response, Mr. Kajihiro provided a letter he prepared in response to the Preparation Notice for the O'ahu ATR EIS to which this CIA is appended and asked that it be referenced as part of his interview comments for the CIA. Mr. Kajihiro's remaining comments will be summarized here only as they pertain to the CIA. For full comments on the O'ahu ATR EIS Preparation Notice, please see the scoping comments in Appendix E of the O'ahu ATR EIS. Mr. Kajihiro shared the following information on cultural resources, practices, and beliefs:

### **Cultural Resources**

- Mr. Kajihiro mentioned "a fishpond in Waiale'e," which is likely a reference to Kalou Pond within the broad geographical area of the KTA project area. He "does not have much personal knowledge of cultural resources in the KTA project area."
- Mr. Kajihiro was aware of individuals who "testified" in cultural monitoring and archaeological projects that iwi kūpuna were found in the area of the KTA project area, but he did not provide a location for these resources.
- Mr. Kajihiro claimed that "archaeological and cultural monitoring reports conducted for KTA throughout the years have been inadequate."
- With regard to an assessment of cultural resources, Mr. Kajihiro issues the reminder that "a cultural resource may also be natural features of the landscape, such as a mountain, hill, rock, tree, stream, or animal which has cultural significance to Kānaka 'Ōiwi" as well as part of a larger connected cultural landscape or ka'ānani'au (Kajihiro 2021:10–11). Mr. Kajihiro further recommends that the Papakū Makawalu methodology, developed by the Edith Kanaka'ole Foundation, be utilized in addition to a separate, in-depth cultural landscape study and ethnographic survey (Kajihiro 2021:11).

### **Cultural Practices and Beliefs**

- Mr. Kajihiro "does not have any specific knowledge of cultural practices or beliefs associated with the KTA project area."
- Within the broad geographical area of the project area, Mr. Kajihiro related this mo'olelo about Kahuku being "a floating area of land" at one time; the "demi-god Maui used his fishhook to connect Kahuku back to the island" and "this fishhook is said to be buried somewhere in Waiale'e."
- Mr. Kajihiro's paramount concern was ensuring understanding of the integral connection between Kānaka 'Ōiwi (Native Hawaiians) and the 'āina. He shared, "In order to properly assess the impacts of the proposed action, the O'ahu EIS must first situate Kānaka 'Ōiwi (Native Hawaiians) as genealogically, culturally, and spiritually related to the 'āina (land) itself. This means that any activities which affect the environment necessarily affect Kānaka 'Ōiwi, especially those with closer genealogical ties to the particular lands in question. Such an orientation will also affect how the significance of impacts are evaluated." (Kajihiro 2021:1)

- Mr. Kajihiro reinforced this by referencing several legal standards, which recognize the intrinsic connection of the ‘āina with Native Hawaiian cultural practice.
- Mālama ‘āina or caring for the land is an essential element of Kānaka ‘Ōiwi cultural practice (Kajihiro 2021: 13).

#### **4.2.2.7 Mr. Thomas Lenchanko**

The interview with Mr. Thomas Lenchanko was conducted by Mr. Sproat and Dr. Trisha Kehaulani Watson-Sproat from Honua Consulting, LLC on May 10, 2022. Mr. Lenchanko shared the following information on cultural resources, practices, and beliefs:

##### **Cultural Resources**

- Mr. Lenchanko stated that native hardwood trees, such as sandalwood and alahe‘e, are found in the mountainous regions of Kahuku and “‘ohana from Kahuku shared with him that they sighted over 100 different native plants within the KTA area”; however, he did not provide a specific location for these resources.
- Mr. Lenchanko discussed how pueo, “a vulnerable cultural resource,” “frequent the Kahuku area,” but the last time he visited Kahuku he did not see any pueo.

##### **Cultural Practices and Beliefs**

- Mr. Lenchanko referred to the “larger Kahuku area,” which includes the KTA project area, “and its connection to the central plain as the ka‘ānani‘au [land division before the ahupua‘a system] of ‘Ō‘io.” There are old trail systems that connect this area to Pūpūkea, Kūkaniloko, and other significant areas.
- Mr. Lenchanko mentioned that “an ali‘i born in Kahuku could be taken to Kūkaniloko for protection, because it is a pu‘uhonua (place of refuge).”
- Mr. Lenchanko shared that Kahuku is connected with the “traditions of nightmarchers and burial sites.”

#### **4.2.2.8 Mr. Christophor Edward Oliveira**

The interview with Mr. Christophor Edward Oliveira was conducted by Mr. Sproat from Honua Consulting, LLC on June 5, 2022. Mr. Oliveira shared the following information on cultural resources, practices, and beliefs:

##### **Cultural Resources**

- Mr. Oliveira stated there are “large burial sites with iwi kūpuna” within the KTA and two recently discovered burial caves; however, he did not provide any specific locations for these resources (note, Army records do not include any known burial sites within the State-owned land at KTA but do include known

burial sites in the broad geographical area [Gross et al. 2023:46; Historical and Cultural Resources Literature Review, Appendix I to the O‘ahu ATR EIS]).

- Mr. Oliveira also shared that “Kahuku contains many heiau, including Keana Heiau”; however, he did not provide any specific locations for these resources.

#### **Cultural Practices and Beliefs**

- Mr. Oliveira shared how lā‘au lapa‘au was a cultural practice associated with Kahuku and surrounding areas, but he did not state whether this practice occurred within the State-owned land at KTA.
- Mr. Oliveira expressed that “in places like Kahuku” “all traditions and cultural practices were once maintained from canoe carving to medicinal practices.”
- Mr. Oliveira stated “Kahuku and the surrounding area was home to many kāhuna” and “kāhuna lineages are significant in terms of religious worship and guidance to the people.”
- Mr. Oliveira explained that the investigation of variations in and evolutions of place names “reveal the significance of a specific ‘āina.”

### **4.3 IDENTIFIED CULTURAL RESOURCES, PRACTICES, AND BELIEFS**

This section provides a summary overview of cultural resources, practices, and beliefs identified for the KTA project area and the broad geographical area based on the results of archival research and consultation and interviews.

#### **4.3.1 Summary of Data Obtained from Archival Research**

Archival research revealed numerous cultural resources, practices, and beliefs associated with the State-owned land at KTA and the broad geographical area. There is one mo‘olelo associated with Paumalū Gulch (within the project area) as well as place-based knowledge in several inoa ‘āina associated with landscape features within the KTA project area as well as the broad geographical area. Traditional agricultural practices (kalo farming) are mentioned within the broad geographical area of the KTA project area. Traditional gathering practices of native plants, trees, and flowers, as well as hunting practices, are also recorded for the broad geographical area of the project area; it is unknown from archival research if these practices occurred within the State-owned land at KTA. One recorded archaeological site and several isolated artifacts with Traditional Hawaiian context occur within the project area, including Site 4887, a habitation site in Tract A-1. These indicate traditional uhau humu pōhaku and noho (habitation) may have occurred within the project area. Lastly, spiritual beliefs associated with ancestral guardians, caretakers, and protectors are known for the broad geographical area.

#### **4.3.2 Summary of Data Obtained from Survey and Interviews**

The data obtained from this project’s initial community outreach and online survey yielded information about the sharing of mo‘olelo, ceremonial practices, and the cultural practices and beliefs centered

around mālama ʻāina that are associated with the broad geographical area. It is unclear from the survey results if any of these practices occur directly within the State-owned land at KTA. Ceremonial practices associated with caring for iwi kūpuna and Hawaiian burials, for example, were mentioned by several survey respondents. According to archaeological data obtained from the Army, there are no recorded burials located on State-owned land within the KTA; however, due to the secrecy and care imparted on iwi kūpuna, it is possible that not all burial site locations are known by the Army.

Eight individuals were interviewed for information on cultural resources, practices, and beliefs occurring within or associated with the KTA project area and the broad geographical area. Three of the eight interviewees noted the presence of burial sites in the broad geographical area of KTA project area and the need for Hawaiians to care for these burial sites and associated iwi kūpuna (Mr. Oliveira, Mr. Cáceres, and Mr. Lenchanko).

Traditional resource gathering was also mentioned by two interviewees, including the practice of gathering native plants for lāʻau lapaʻau (traditional medicine) as well as native wood (sandalwood and alaheʻe) for canoe carving and wood working (Mr. Oliveira and Mr. Lenchanko). The interviewees did not, however, identify whether these activities are associated with the KTA project area or with the broad geographical area surrounding the project area.

The belief in and need to practice mālama ʻāina was noted by Mr. Cáceres and Mr. Lenchanko, as was the belief that the land itself is a significant cultural resource. Mr. Oliveira emphasized this belief by stating that the land is an important resource to Hawaiians and that it is not always used for worship or specific practices, but simply to exist and be with the land of their ancestors.

Overall, while survey respondents and interviewees identified resources, practices, and beliefs, informants did not directly connect these resources to the specific geographical boundaries of the State-owned land at KTA (the project area).

#### **4.4 EFFECTS TO CULTURAL RESOURCES, PRACTICES, AND BELIEFS**

This section summarizes effects to cultural resources, practices, and beliefs from continued military activity in the KTA project 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 Section 8.1.

Mr. Apo

- Provided no knowledge of any impacts from the Proposed Action.

Mr. Cáceres

- Impacts from military training, lack of access, impacts to burial sites from people avoiding closed land and encroaching on burial sites, and the inability to practice burial maintenance.

Mr. Grace

- Impacts from military munitions.

Mr. Hannahs

- Impacts to the environment and natural habitats.

Mr. Hoe

- Impacts from erosion.

Mr. Kajihiro

- “Adverse impacts on cultural practices include, but are not limited to restrictions on access due to security or safety restrictions, the destruction of cultural or religious sites, the destruction of environmental resources needed for conducting cultural practices, and the disruptions of the view plane and serenity of the area caused by military activities” (Kajihiro 2021:12).

Mr. Lenchanko

- Impacts from military training, lack of access, and inability to engage in cultural practices.

Mr. Oliveira

- Impacts from military training, lack of access, and inability to engage in cultural practices.

Repeated impact concerns, as shared by the interviewees for the KTA project area, include three general categories: 1) impacts from continued military training/activity (stated by five of eight interviewees), 2) impacts from lack of access (stated by four of eight interviewees), and 3) general environmental impacts that were not always expanded upon (stated by three of eight interviewees). Although one interviewee discussed impacts to burial sites from continued military activity within the KTA, including the project area, according to the Army, there are no known burial sites within the State-owned land (project area) at KTA. Lastly, only one interviewee had no impact concerns to share for the KTA project area.

See Section 8.1 for an analysis of these potential impacts.

## 5 KAWAILOA-POAMOHO TRAINING AREA (POAMOHO)

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The project area for Poamoho, located within the southern portion of the larger KLOA, comprises approximately 4,390 acres and is situated within the interior portion of O‘ahu Island in the Waialua District; it encompasses one TMK parcel (TMK [1] 7-2-001:006) within Kamananui Ahupua‘a (Figure 14–Figure 16). The eastern portion of the project area for Poamoho is also referred to as the Proposed NAR Tract (established by Hawaii Board of Land and Natural Resources in 2005), while the remaining western portion is referred to as the Poamoho Tract.

This chapter provides a cultural contextual overview of archival and interview data obtained for the Poamoho project area. Section 5.1 presents aspects of Poamoho’s natural environment, cultural landscape, and archival history, as well as summarizes findings from ethnographic studies conducted in the project area. Section 5.2 summarizes the responses received from the online survey as well as one-on-one interviews. Section 5.3 presents an overview of identified cultural resources, practices, and beliefs obtained from this research, and Section 5.4 discusses any adverse effects on these cultural resources, practices, and beliefs.

### 5.1 ARCHIVAL RESEARCH

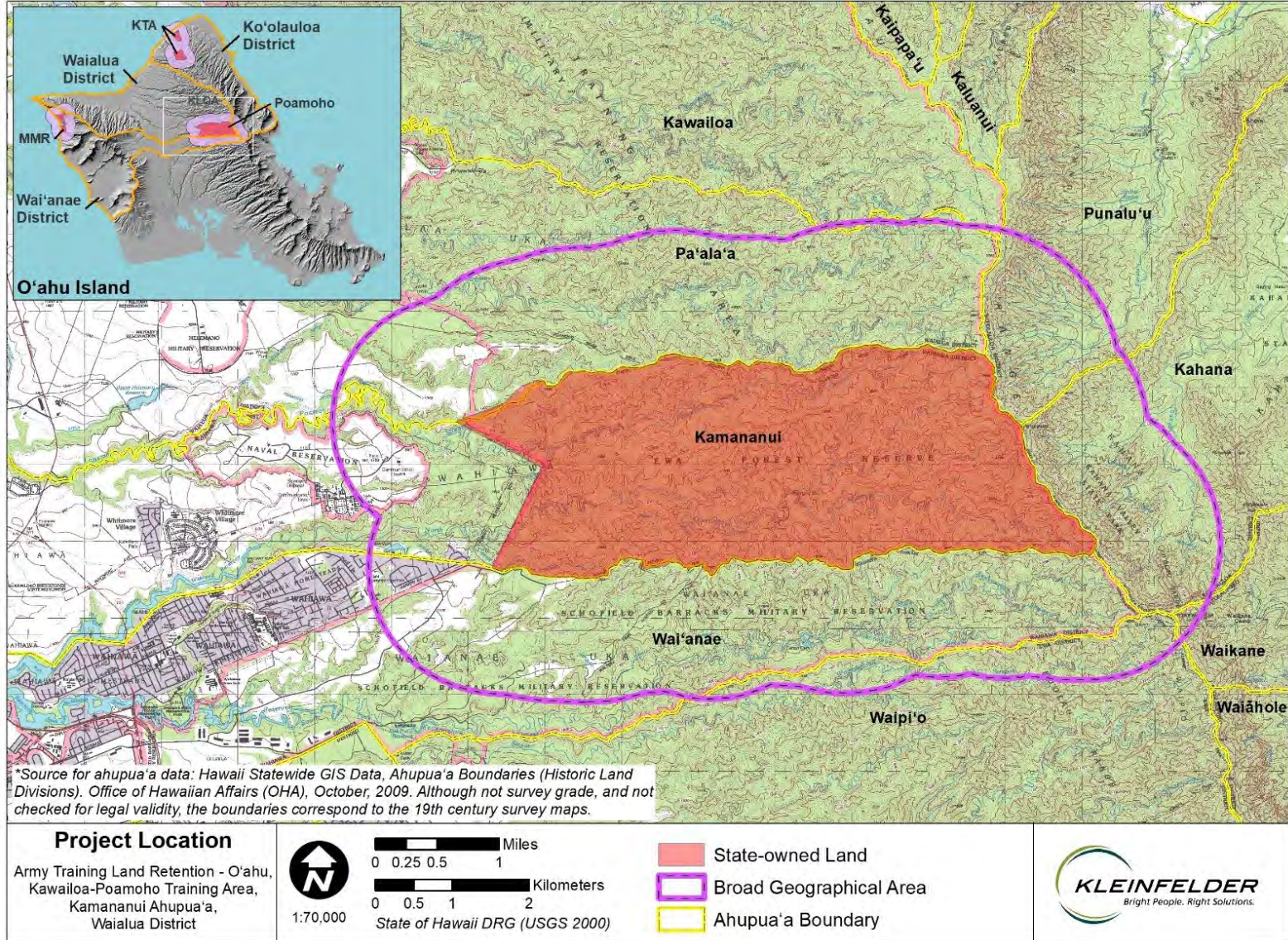
Archival research was conducted for the natural environment, cultural landscape, archival history, and previous ethnographic interviews to search for historical recordation of cultural resource, practices, and beliefs that may have occurred in the project area. The results of that research are contained in the following sections.

#### 5.1.1 Natural Environment

The project area for Poamoho is situated east of Wahiawā in the easternmost portion of Kamananui Ahupua‘a within the moku of Waialua and along the western slopes of the Ko‘olau Mountains. The eastern boundary of the project area follows the top of the Ko‘olau Mountain range (see Figure 14). There are various environmental aspects within the Poamoho project area and the broad geographical area that have cultural significance. These are discussed below.

##### 5.1.1.1 Wai

There are two freshwater sources in Poamoho: North Kaukonahua and Poamoho Streams (Figure 17). North Kaukonahua Stream is within the southern half of the project area running in an east-west orientation. The stream flows 33 miles to the North Shore, making it the longest waterway in the islands (Pukui et al. 1974:92). Poamoho Stream runs through the northern portion of the project area, also in an east-west orientation. Both streams start within the Ko‘olau Mountains and flow toward Wahiawā.



**Figure 14. Overview of the State-owned land at Poamoho and the broad geographical area, shown on 2000 USGS DRG map.**



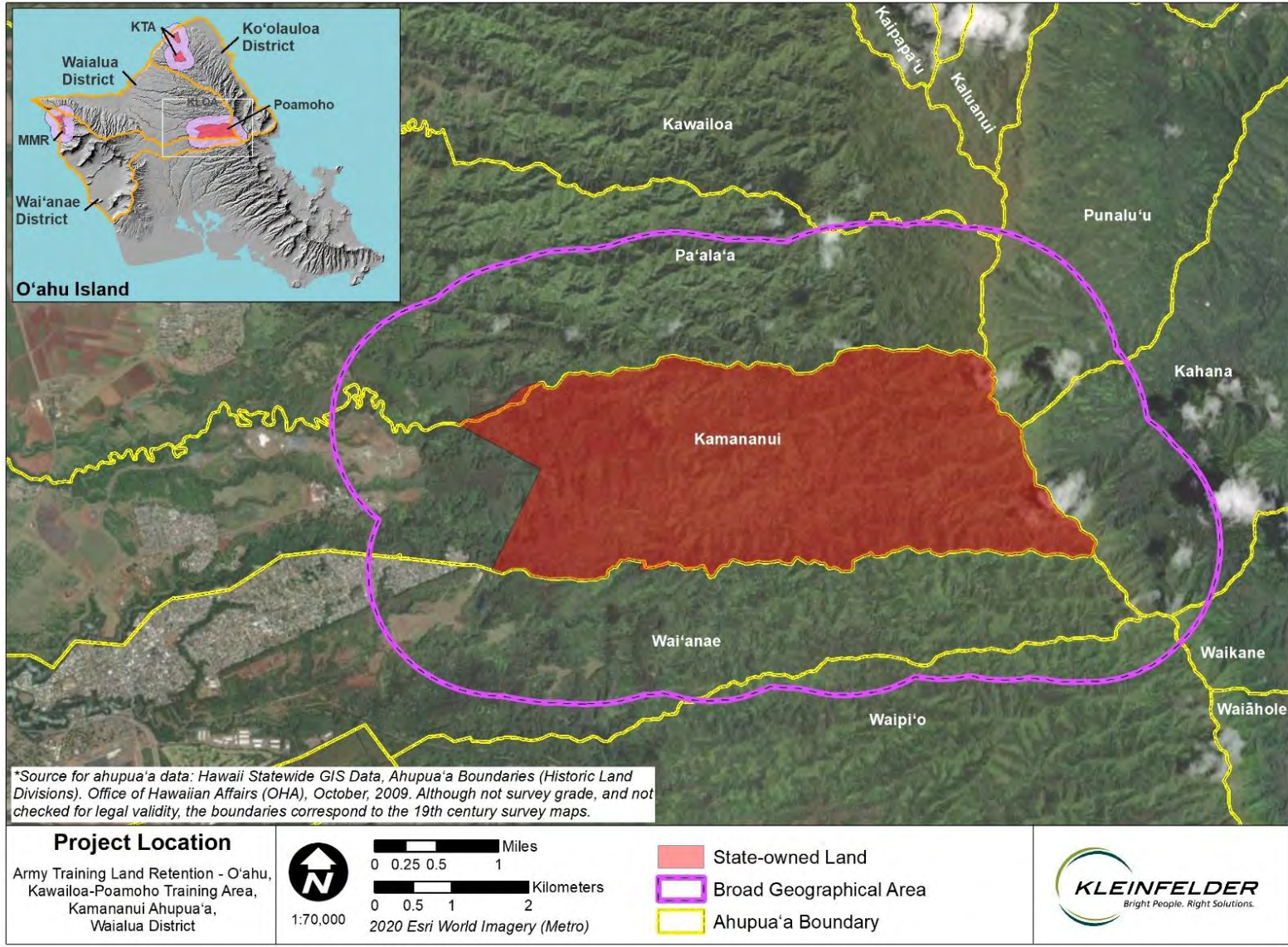


Figure 15. Overview of the State-owned land at Poamoho and the broad geographical area, shown on 2020 aerial imagery.

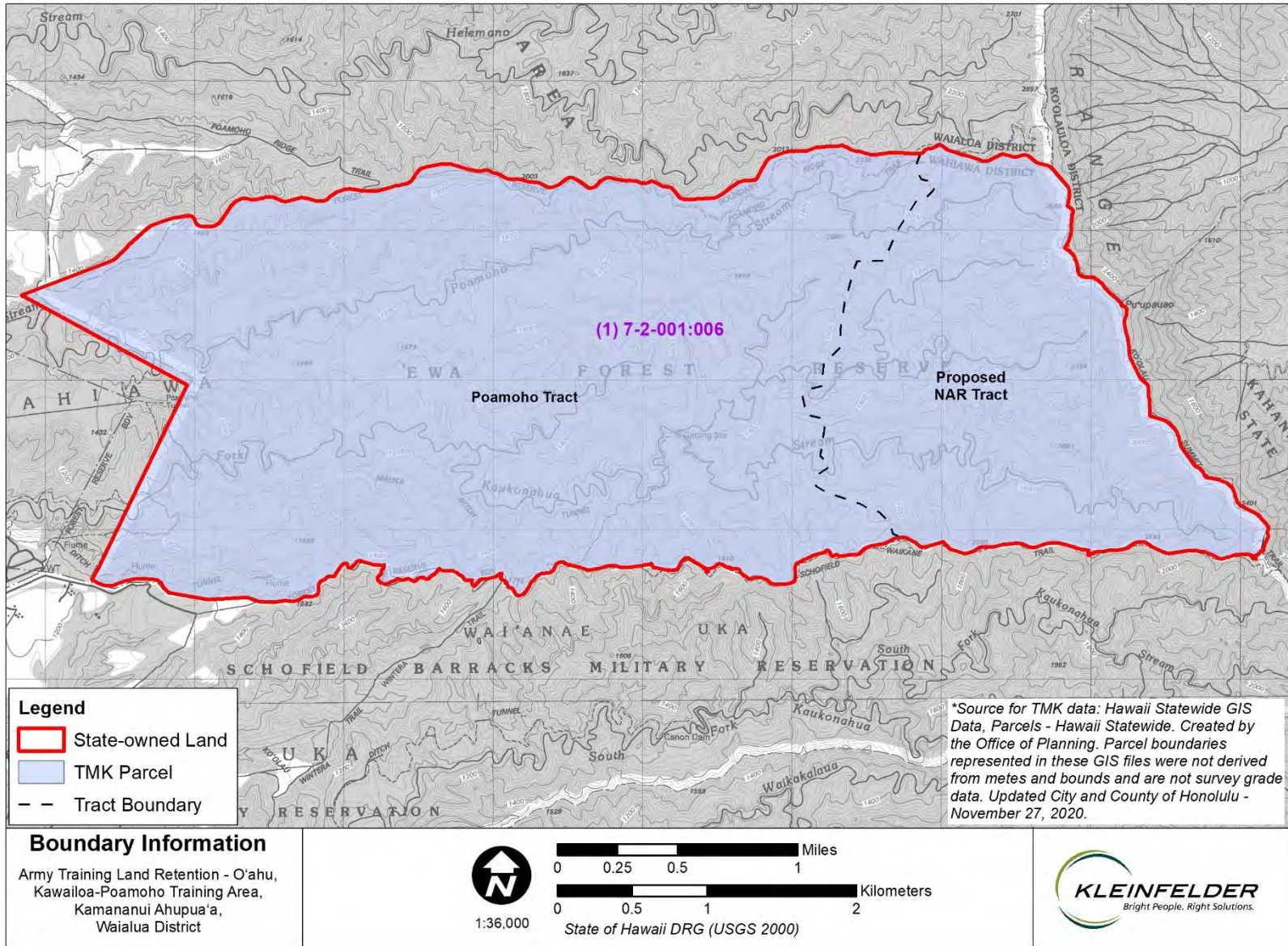
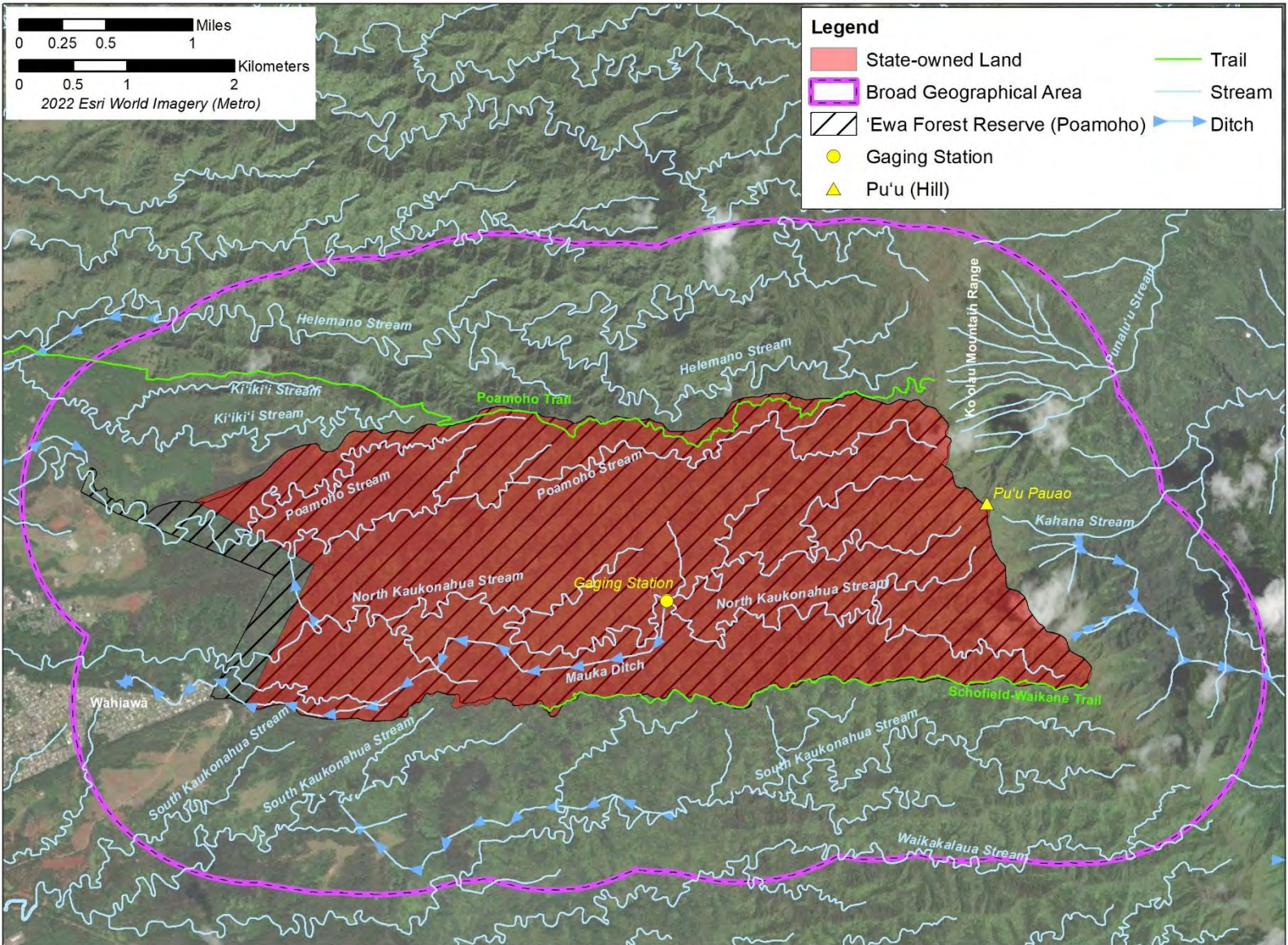


Figure 16. TMK and Tract information within the State-owned land at Poamoho.



**Figure 17. A sample of geological names and place names within the State-owned land at Poamoho and the broad geographical area.**

### 5.1.1.2 Rains

Although there are no known names for rains that occur within the State-owned land at Poamoho itself, there are at least two rain names associated with Wahiawā, located to the west and within the broad geographical area of the project area. The first is Kuahine, which literally means “sister of a male” (Pukui et al. 1974:118). This rain is mentioned in a mele, along with Wahiawā, within a mo’olelo of Hi’iakaikapoliopole (Ho’oulumāhiehie [in *Ka Na’i Aupuni*, January 18, 1905], as quoted in Akana and Gonzalez 2015:119):

He nui nā ‘oihana a ka Wai’ōpua	The Wai’ōpua wind has many tasks
He ‘oihana nō ia na ke Kuahine	An undertaking by the Kuahine rain
Ho’omaika’i pa’a pono ihola i ke kula	Bringing long-lasting pleasure to the plains
None, pa’ani i ka Waikōloa	Teasing, playing on the Waikōloa wind
Pa’ani le’ale’a i Wahiawā	Pleasurable fun at Wahiawā

The second rain name is ‘Ula, meaning “red, scarlet” (Pukui and Elbert 1986:367). It is recorded in a mele “composed for Liholiho and inherited by Kalākaua” (Buke Mele Aimoku, 146, as quoted in Akana and Gonzalez 2015:262):

‘O māua kai ka ua ‘Ula o Wahiawā	We two in the ‘Ula rain of Wahiawā
He ho’olu’u moelua ne ke Ki’oao	Striped dye of the Ki’oao rain
Ke ho’olu’u maila i uka o Kahui	Immersing the uplands of Kahui
I ‘ale’ale a pihi a hanini	Which is filled and full and overflowing

### 5.1.1.3 Winds

No names for winds were identified for the Poamoho project area or the broad geographical area.

### 5.1.1.4 Pu’u

One pu’u, Pu’u Pauao, is located on the eastern boundary of the State-owned land at Poamoho, along the Ko’olau Mountains. Archival research did not find any cultural resources, practices, or beliefs connected to this pu’u (see Figure 17).

### 5.1.1.5 Traditional Plants

Plant species with a connection to cultural practices and beliefs have been recorded within the Poamoho project area; these include koa, ‘ōhi’a lehua, and uluhe (USGS 2016). Koa, ‘ōhi’a lehua, and uluhe have many uses including, but not limited to, canoe making, construction, and lei making. These three plants were previously discussed in Section 4.1.1.5, and more details on the history and uses of these plants are located there.

## 5.1.2 Cultural Landscape

Like Section 4.1.2, the following sections discuss the tangible and intangible expressions of cultural beliefs and practices on the physical landscape of the project area and the broad geographical area.

### 5.1.2.1 Inoa 'Āina (Place Names)

Poamoho is not widely used as a place name for the project area. "Poamoho" is described in *Place Names of Hawai'i* as a "stream, trail, and camp" located in Wahiawā, O'ahu (Pukui et al. 1974:185). The name Poamoho primarily refers to the common name for the watershed as opposed to the traditional place name, which would be Kamananui, Wahiawā, or Kūkaniloko. Therefore, while the project area is described by the State and Army as Poamoho, it largely overlaps with the kalana (land division) of Wahiawā. The term "kalana" is not frequently used today, and it is not as commonly used as the land term "ahupua'a." However, the leadership of the Hawaiian Civic Club of Wahiawā, use the term "kalana" when referring to their 'āina of Wahiawā. A kalana is defined as: "1. County. 2. Land division smaller than a moku. 3. Section smaller in size than a moku. This term, like 'okana, appears to have been used only on certain islands. 4. Large subsections of an 'okana. 5. The name of a division of an island next less than moku, and synonymous with 'okana in some places. 6. Division of land smaller than a moku or district; county" (Lucas 1995:47).

Andrews (1922:666) says the "derivation [of Poamoho is] unknown". They do, however, identify it as a stream located in Waialua (Andrews 1922:666). Juvik and Juvik's *Atlas of Hawai'i* (1998:8) locate Poamoho (and Poamoho Stream) directly west of where Whitmore Village is today. In 1935, J.W. Coulter locates Poamoho in the Wahiawā quadrant at 21.3n, 157.02w. He further identifies several "sections" and sequential coordinates as Central Poamoho, Main Poamoho, and West Poamoho; additional geographic and related names include Poamoho Stream, Poamoho Ditch, Poamoho Gulch, and Poamoho Tunnel (Coulter 1935:187). Coulter's map of O'ahu uses quadrangles as outlined by USGS to "be published by the War Department" (Coulter 1935:162). In *Sites of Oahu*, E.P. Sterling and C.C. Summers (1978:103, 105, 106; map inserts 128/129 and 136/137) also identify Poamoho Stream and Poamoho Gulch as geological features of the area. R.K. Alameida (1994:27–28) says that Poamoho Stream is one of two rivers "that flow into Kaiaka Bay" and contributes to the name of the moku of Waialua, which is translated as two waters.

Other sources identify the area by alternative names or spellings, including "Po'oamoho". In a letter to the editors of the Hawaiian language newspaper *Ke Au Okoa* in 1866, Hawaiian historian Samuel Kamakau, who was from Waialua, describes Po'oamoho as one of several specific locations in the area where his family is from (Kamakau 1866:3):

O ka aina o Manuaula i Kamananui kewe, mai na pali Lihue a Kukaniloko, a Wahiawa i Pooamoho ka honua, o ko'u poe kupuna no ko'u makuakane.

(The land of Manu‘a‘ula at the curve of Kamananui, from the Līhu‘e cliffs at Kūkaniloko, and Wahiawā at Po‘oamoho is the land of my ancestors of my father).

Po‘oamoho is also translated as “head of the moho” which was a bird associated with the State-owned land and the broad geographical area. Moho is a now extinct flightless native rail (*Pennula sandwichensis*); however, “moho” could mean a “candidate, as in politics” or a “representative selected to participate in a race, wrestling, or betting contest, champion”; it also means “to unfold, of leaves, especially [the] upper leaf of a plant, as sugar cane, taro” (Pukui and Elbert 1986:251). According to Pukui and Elbert (1986:333), po‘a refers to one “castrated, emasculated” but also to “a sudden sound, as of flapping wings of a rooster, or of the thumping sound of the palms of the hands pressed together with fingers locked, or of hands striking the surface of the water; to make such sounds,” as well as “to dig under, undermine.” Andrews (1865:469) writes that po‘a also refers to “throw[ing] water over one’s self; to dive, paddle or play in the water”; “to cast up or spatter water”; and “to wallow and roll in the water like a hog.” Thus, Po‘amoho possibly references the moho bird playing in the stream water, or perhaps a chosen candidate or representative of the ali‘i or akua for sport, religious activity, or a skilled profession.

The meaning of other specific place names within the Poamoho project area and the broad geographical area are described below and their locations are shown on Figure 17.

- Helemano (also called Helemanu, Halemano, and Halemanu): According to Andrews (1922:632), Helemano means “traveling with a large retinue,” and according to Pukui et al. (1974:44) it means “many snared or many going.”
- Kahana: According to Andrews (1922:637), Kahana means “the work,” and according to Pukui et al. (1974:63), it means “cutting.”
- Kamananui: According to Andrews (1922:642), Kamananui means “the wide path,” and according to Pukui et al. (1974:80), it means “the large branch.”
- Kaukonahua: According to Andrews (1922:646), Kaukonahua means “upland place for fruits.” However, Pukui et al. (1974:92–93) writes “According to one explanation the name means “place his testicles” (a man’s testicles were cut off here so that he could leap). A more likely explanation is Kau-kōnāhua (place fatness).”
- Ki‘iki‘i: According to Pukui and Elbert (1986:148), “ki‘iki‘i” is a reduplication of ki‘i, which means “to fetch, get, procure, send for, go after, summon, attack.”
- Pa‘ala‘a: According to Andrews (1922:663), Pa‘ala‘a means “sacred confirmation,” and according to Pukui et al. (1974:173), it means “sacred firmness.”
- Pauao: No translation found.
- Wahiawā: According to Andrews (1922:672), the Wahiawā that is located within Waialua, O‘ahu, means “landing place.” However, according to Pukui et al. (1974:218), Wahiawā literally means “place of noise (rough seas are said to be heard here).”

- Waikakalaua: According to Andrews (1922:672), Waikakalaua means “water of the rain crags,” and according to Pukui et al. (1974:222), it means “water rough [in] rain.”

Consistent with individuals who have knowledge of the project area and the broad geographical area, this CIA will refer to Poamoho as a wahi (place) within the kalana of Wahiawā. Wahiawā will be treated as its own land division as it is by the cultural practices of that kalana; Wahiawā stretches into the upland areas of the ahupua‘a of Kamananui (north), Wai‘anae (Uka), and Waikele and Waipi‘o (south). According to individuals with knowledge of the project area and the broad geographical area, the kalana of Wahiawā is surrounded by Helemano to the north and Līhu‘e to the south. Even though the Hawaii Statewide GIS Program does not indicate Wahiawā as its own moku today (Hawaii State Office of Planning and Sustainable Development 2022), in 1913 the moku of Wahiawā was separated from the moku of Waialua and Wai‘anae with the passage of the Territory of Hawaii’s Act 112 (Coulter 1935:221; Cachola et al. 1987:2). Note that the ahupua‘a map shows the Poamoho project area’s location within the ahupua‘a of Kamananui in the moku of Waialua (see Figure 14).

#### 5.1.2.2 Mo‘olelo

Poamoho is said to have been the location of a battle by the ali‘i ‘Aikanaka, who searched for Halemano, the hero of the story (*Ke Alakai o Hawaii* 1928:4). “He Moolelo Kaa Hawaii no Halemano” tells the story of the hero, Halemano, who understands the danger of the impending battle and tells his wife they will all die if they stay (*Ke Alakai o Hawaii* 1928:4). They wake up early the next morning and depart Po‘oamoho for Halemano’s grandmother’s home in Moelana, located in the ahupua‘a of Kahalu‘u in the moku of Ko‘olaupoko, where they hid from ‘Aikanaka in the foliage of the lush ‘awa groves. ‘Aikanaka’s army arrived at Po‘oamoho and found Halemano gone, so ‘Aikanaka commanded the entire island of O‘ahu be searched to find Halemano (*Ke Alakai o Hawaii* 1928:4). After the searchers had gone, Halemano and his wife went to “Kukui, on this side of Makapuu” and stayed with Halemano’s relatives until midnight, at which time they left by canoe to Kaunakakai, Moloka‘i (Fornander 1918–1919:238). Halemano lived on the islands of Moloka‘i, Maui, and Hawai‘i for a time before returning to O‘ahu and staying at Ka‘ena Point (Fornander 1918–1919:240, 260).

Only one place name within the State-owned land at Poamoho, Kamananui, has an entry in the *‘Ōlelo No‘eau* by Pukui (1983:291):

Pili pono ka lā i Kamananui.

*The sun is very close to Kamananui.*

A play on Ka-mana-nui (The-great-power). When the person in power becomes angry, everyone around him feels uncomfortable, as in the scorching, blistering sun.

### **5.1.2.3 Archaeological Sites**

No cultural resources investigations or surveys have been conducted within the State-owned land at Poamoho because there have been no proposed undertakings that would trigger a survey. To date, no archaeological sites or features have been identified.

### **5.1.2.4 Trails**

There are two trails within or adjacent to the Poamoho project area, Poamoho and Schofield-Waikane trails; both are historical trails but do not have any archival data related to traditional uses. Poamoho Trail runs through the northern forests of the State-owned land at Poamoho and is shown on historical maps starting in 1943, while Schofield-Waikane Trail follows along the southern border of the project area and is shown on historical maps starting in 1929 (Figure 18 and Figure 19). The 3.5-mile Poamoho Trail begins at Pa'ala'a Uka Pūpūkea Road off Kamehameha Highway, winds through abandoned agricultural fields, along mountain ridges through the northern part of the project area, and ends at the Ko'olau Summit. According to the Nā Ala Hele Trail and Access Program website, this trail began as an old marsh trail in the early 1930s that was improved in 1934 by the Wahiawa Camp of the Civilian Conservation Corps and renamed as Poamoho Trail. The trail is still in use by the public today for hiking and camping (DOFAW 2022c).

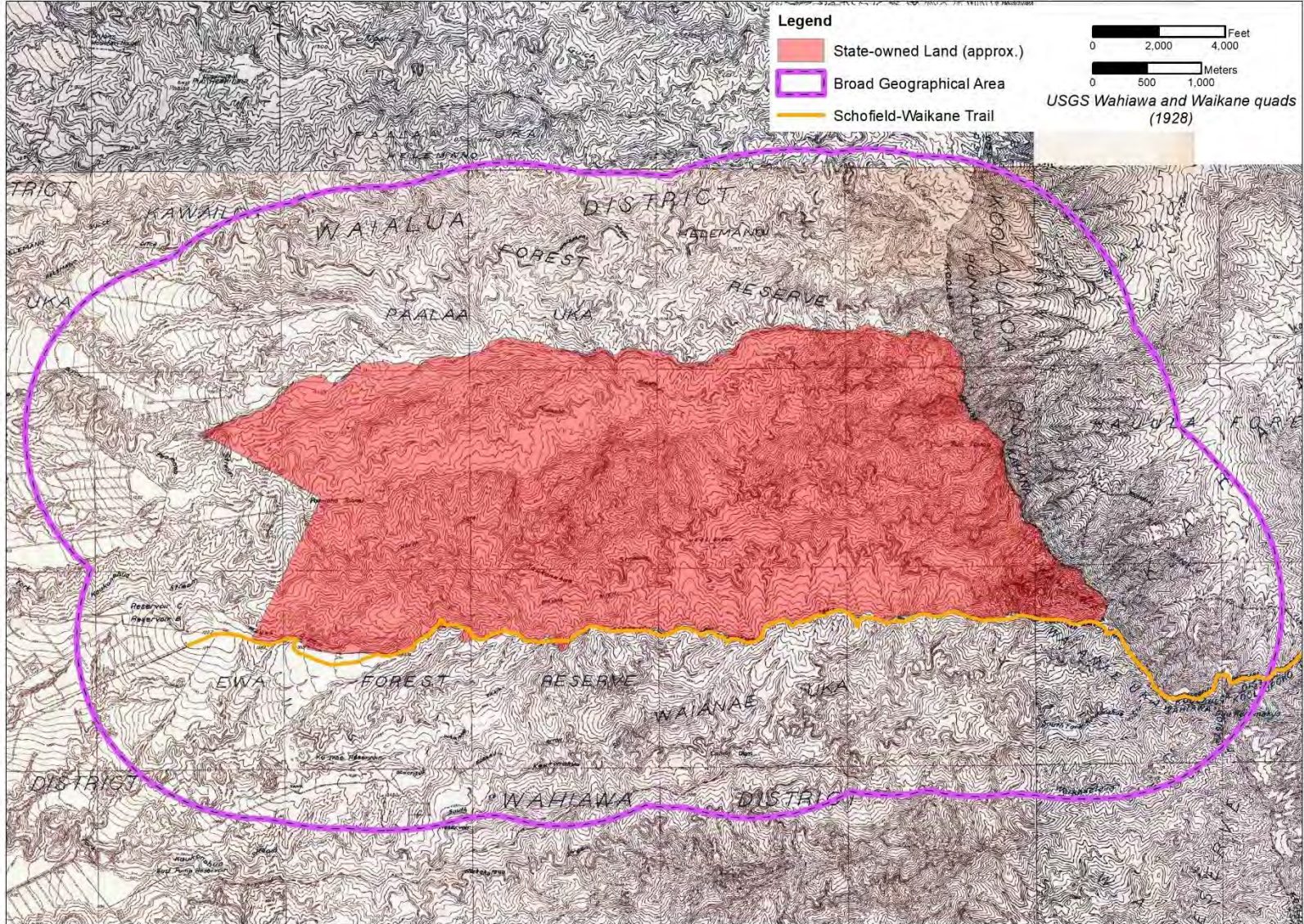
The 4-mile Schofield-Waikane Trail begins at the end of California Avenue in Wahiawā, then climbs through native forests, along the southern border of the project area, and up a ridge to the Ko'olau Summit. This pedestrian hiking trail is open to the public today but requires written permission from the Army Department of Public Works since access is through Schofield East Range. The Nā Ala Hele Trail and Access Program website provides this history of the trail (DOFAW 2022d):

The Schofield-Waikane Trail started out as a plantation ditch trail and then became an Army route connecting Schofield Barracks with the windward side. In 1900, Waiialua Agricultural Company built the initial section along the ridge to gain access to the intake of the Mauka Ditch along Kaukonahua Stream. The Army extended the trail to the Ko'olau Summit in 1912 and built the windward Waikane section in 1923. The wide, graded path was suitable for horses and mules. In the mid 1930s, the Civilian Conservation Corps reconstructed deteriorated sections of the Army route.

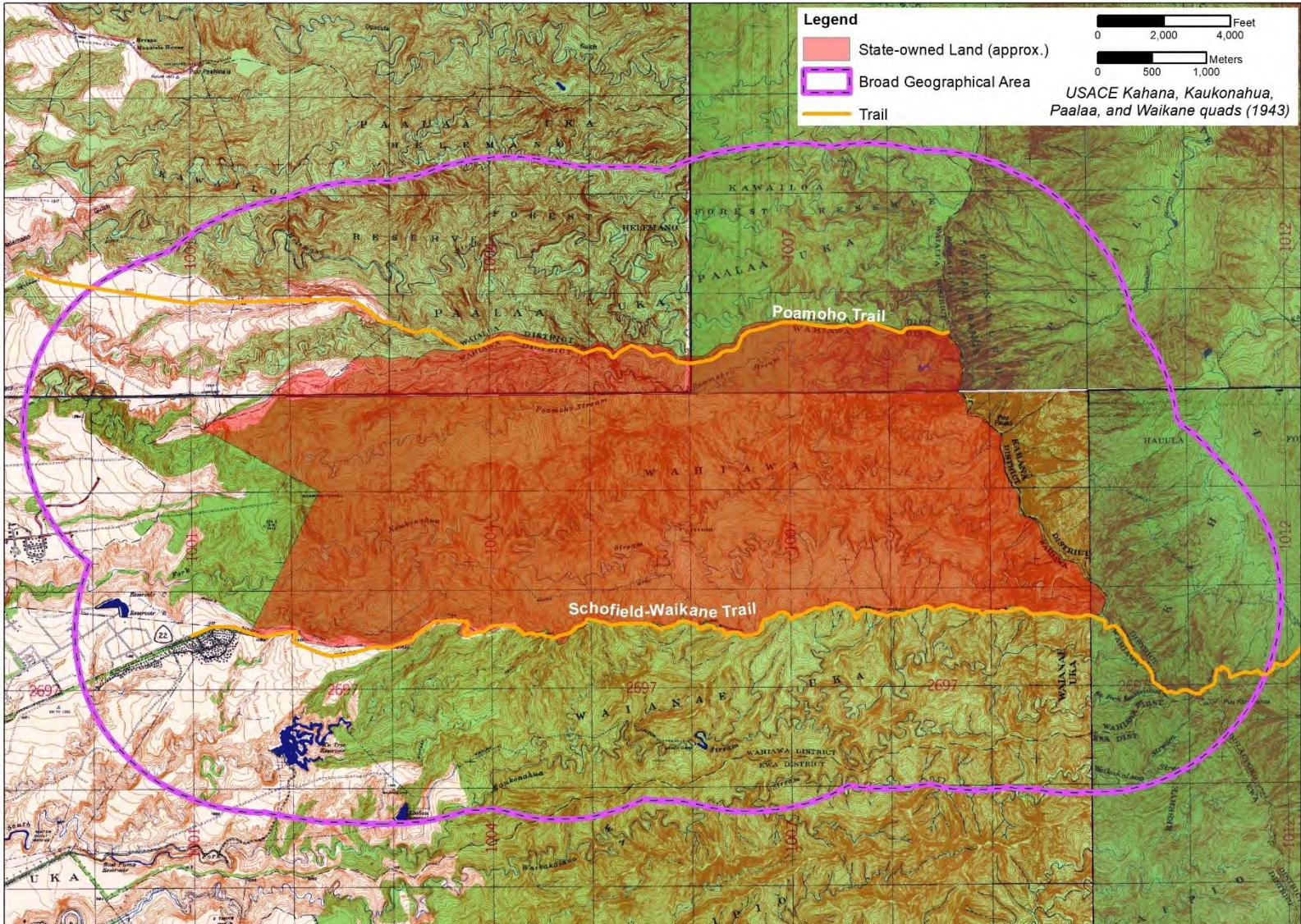
### **5.1.3 Archival History**

An overview of three main historical eras as they relate to the Poamoho project area is presented in the following three sections.





**Figure 18. 1928 USGS Wahiawa and Waikane quads showing Schofield-Waikane Trail along the southern border of the State-owned land at Poamoho.**



**Figure 19. 1943 USACE Kahana, Kaukonahua, Paalaa, and Waikane quads showing Poamoho Trail within the northern border and Schofield-Waikane Trail along the southern border of the State-owned land at Poamoho.**

### 5.1.3.1 Traditional Historical Context

The State-owned land at Poamoho is comprised of rugged, steep topography in the remote interior of O‘ahu and is heavily vegetated, receiving some of the highest levels of rainfall on the island. Intensive Traditional Hawaiian activity in the Poamoho project area and the broad geographical area was likely low compared to coastal regions and flatter inland areas for these reasons; however, no cultural resources surveys have been conducted within the project area for Poamoho to verify this statement.

In the broad geographical area, Wahiawā held great importance to the Hawaiian people in the traditional era. Wahiawā on the western slopes of the Ko‘olau Range was an area known as the home of chiefs. One of the most notable figures to be raised in Wahiawā was Mā‘ilikūkahī, one of the great ali‘i of O‘ahu who reigned well before the time of Kamehameha. When he was 29 years old, Mā‘ilikūkahī was chosen by the chiefs, priests, and the working class (commoners) to be high chief of the island and was consecrated in a ritual that “pertained to high chiefs from remote times . . . It was not performed for rebellious chiefs, however, nor for warrior chiefs who took the kingdom by force, but for ‘chiefs of Pōkano’ [chiefs of unblemished bloodlines from remote times.]” (Kamakau 1992:54).

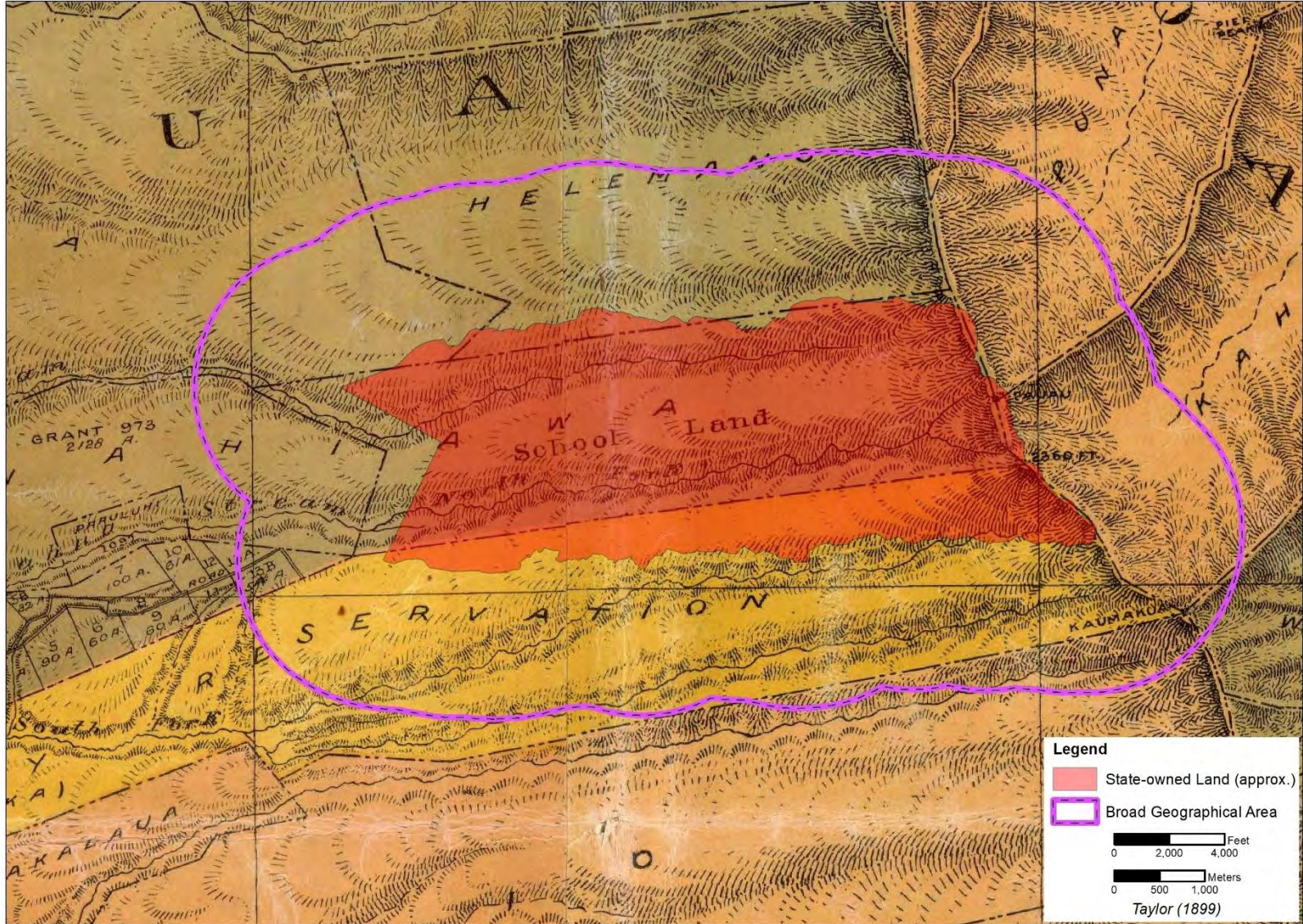
Handy and Handy (1991:464) also note that Wahiawā was a large pre-Contact settlement centered around extensive lo‘i, or wetland agricultural terraces, northwest of Wahiawā town. They also claim that sweet potato was cultivated in Wahiawā in irrigated plots, a rare practice in Traditional Hawai‘i.

### 5.1.3.2 Post-Contact and Kingdom History

There are no known early Historic Period accounts that refer specifically to the project area for Poamoho; most historical mentions of the central plain focus on Wahiawā, southwest of Poamoho.

The sandalwood trade boomed in the 1820s when ali‘i were encouraged by foreign traders to participate in the market. The fragrant Hawaiian sandalwood (‘iliahi or ‘aoa), a major export to the Chinese market between the 1790s and 1830s, was a common forest tree in the central plateau of Wahiawā. Kamakau wrote that “at the completion of the fort [at Honolulu in 1816] the chief Kalanimoku [sic] and all the ali‘i went to work cutting sandalwood at Wahiawā, Halemano, Pu‘ukapu, Kānewai, and the two Ko‘olau [Loa and Poko]. The largest trees were at Wahiawā, and it was hard work dragging them to the beach” (Kamakau 1992:207).

In the 1848 Māhele ‘Āina, Kamananui, which includes the Wahiawā area, was designated Government Land. In 1853, 2,128 acres of land in upland Kamananui was awarded to Robinson and Company as Grant 973 (Landrum et al. 1997:29) (Figure 20). Grant 973, which abuts the western boundary of the project area for Poamoho, was situated between the gulches of Poamoho and North Kaukonahua, encompassing



**Figure 20. Portion of Taylor (1899) map of O’ahu showing the State-owned land at Poamoho as “School Land” within Wahiawā and Grant 973 west of the State-owned land.**

today's Whitmore Village and the Naval Computer and Telecommunications Area Master Station Pacific (NCTAMS PAC) facilities north of Wahiawā. There are no LCA claims located within the project area for Poamoho. An 1899 map of O'ahu depicts the State-owned land at Poamoho as "School Land" (see Figure 20).

### **5.1.3.3 Agricultural and Subsistence History**

Peter Young (2017) describes the "dramatically altered . . . landscape of Kamananui Ahupua'a during the last two decades of the nineteenth century" due to the growth of agriculture in the ahupua'a. Dole Foods Hawai'i grew pineapple on a plantation to the west of the Poamoho project area, and a 1952 USGS aerial shows some pineapple cultivation encroaching on the northwest corner of the State-owned land (Figure 21). Also shown on historical maps starting in 1929 is a Mauka Ditch beginning within the south-central portion of the project area at a USGS gauge in the North Kaukonahua Stream (see Figure 18 and Figure 19). This ditch meanders west within the project area and exits the southwestern corner toward Wahiawā. This ditch may have served agricultural purposes, as well as supplying water to the growing residential area of Wahiawā.

In the early twentieth century, reforestation agriculture was conducted by a partnership between the Hawaiian Sugar Planters' Association and Territorial Forestry as part of the establishment of forest reserves throughout Hawai'i; these reforestation efforts included the western end of the Poamoho project area (Woodcock 2003:629–630). Otherwise, no agricultural or ranching activities occurred within the project area.

Pig hunting occurs within the project area, and a public hunting area is passed through when hiking Poamoho Trail (DOFAW 2022c). With the introduction of modern weaponry and foreign game, hunting in Hawai'i today is much different than in the traditional context. Nonetheless, modern hunting is an important cultural practice for many Native Hawaiians and other ethnic groups who rely on hunting for subsistence. According to the 2018 DOFAW hunting survey (see Section 3.8), of the 764 hunters who reported that they hunted in public hunting lands, eight percent reported that they hunted in the O'ahu "East," which includes Pūpūkea-Paumalū Forest Reserve, Kaipapa'u Forest Reserve, Hau'ula Forest Reserve, 'Ewa Forest Reserve (in which Poamoho project area is located), and Kuli'ou'ou I and II (DOFAW 2018:10).



**Figure 21. Western portion of the State-owned land at Poamoho (outlined in red), depicted on 1952 USGS aerial showing pineapple fields to the west with historical agricultural land alteration extending into the northwest corner of the State-owned land.**

#### **5.1.3.4 Military History**

The Poamoho project area is part of the larger KLOA that was established as a troop maneuver and training area in 1955 (USAG-HI 2018b:54). Under the current 65-year lease (State General Lease No. S-3846), which was executed on August 17, 1964 (DLNR 1964b), only aerial training is permitted within the Poamoho project area, including low-altitude helicopter aviation training at several helicopter landing zones in the northwest corner of the parcel (USAG-HI 2018a:54).

#### **5.1.4 Previous Ethnographic Interviews**

No previously compiled ethnographic interviews are known for the project area. A prior ethnographic study by Desilets et al. (2011) entitled *Traditional Hawaiian Occupation and Lō Ali'i Social Organization on O'ahu's Central Plateau: An Ethno-Historic Study* provides a thorough ethno-historical investigation into the nature of Traditional Hawaiian occupation and land use in the Central Plateau of O'ahu Island. The study provides a comprehensive background context to the Wahiawā Plain but does not include interviews or archival information specific to the State-owned land at Poamoho and so is not discussed here.

## 5.2 ONLINE SURVEY AND INTERVIEWS

Individuals and organizations with expertise and knowledge of cultural resources, practices, and beliefs relevant to the project area were given an opportunity to participate in an online survey as well as one-on-one interviews. The following sections summarize the responses received during this outreach process.

### 5.2.1 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. Appendix B presents full questions and responses to this survey. The survey for the Poamoho project area received a total of four respondents (note, however, that some questions were skipped and did not receive responses from all four respondents). These respondents expressed knowledge of cultural resources, practices, and beliefs within the area and noted the following as being pertinent to the project area: the practice of sharing mo'olelo; mālama 'āina; traditional resource gathering, including for lā'au lapa'au; travel; and hunting. These are summarized below.

*Mo'olelo* referenced by survey respondents for the project area include stories of Pele traveling through the area as well as stories of Lā'ieikawai, the Maile sisters, Hi'iakaikapoliopole, and Kamapua'a's pursuit of Pele.

*Mālama 'āina* and *traditional resource gathering* were mentioned by survey respondents for the project area. Survey respondents particularly highlighted the importance of the natural resources in Poamoho which are used in cultural practice and for traditional beliefs. The native animals in the area are considered 'aumākua, and native plants are used for lā'au lapa'au (medicinal purposes). The mountains and forests as well as the land itself is also considered sacred.

*Travel* through this area was also mentioned as a past and ongoing practice with the expressed desire to continue this practice into the future.

*Hunting* for pua'a (pig) was also mentioned as an ongoing subsistence practice in the area.

It is unclear how many of these cultural practices and beliefs are occurring within State-owned land versus the broad geographical area around the project area.

All survey respondents who provided answers shared some aspect of cultural significance to the Poamoho project area and the broad geographical area; all respondents reported they were aware of cultural resources, practices, and/or beliefs associated with the project area.

## 5.2.2 Interview Responses

One-on-one interviews were conducted with seven individuals associated with the Poamoho project area (Table 3). 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 D. The current section lists the cultural resources, practices, and beliefs each interviewee mentioned that pertained to the State-owned land at Poamoho and the broad geographical area. For a list of effects to cultural resources, practices, and beliefs from continued military activity in the Poamoho project area as identified by interviewees, see Section 5.4. For a list of the interviewees' mitigation recommendations for the Poamoho project area, see Section 9.2.2. Biographical information for each interviewee is provided in Section 2.2.2.1.

**Table 3. Individuals Interviewed for Poamoho Project Area**

INTERVIEWEE	INTERVIEW TYPE
Mr. (Norman) Mana Kaleilani Cáceres	Telephone
Mr. (Nathan) Keola Grace	Telephone
Mr. Neil J.K. Hannahs	In person
Mr. Allen Hoe	Telephone
Mr. Kyle Kajihiro	Telephone
Mr. Thomas Lenchanko	Telephone
Mr. Christophor Edward Oliveira	Telephone

### 5.2.2.1 Mr. (Norman) Mana Kaleilani Cáceres

The interview with Mr. Cáceres was conducted by Mr. Sproat from Honua Consulting, LLC on June 13, 2022. Mr. Cáceres shared the following information on cultural resources, practices, and beliefs:

#### Cultural Resources

- Mr. Cáceres shared that he was “not personally familiar with the cultural resources in the Poamoho project area.”

#### Cultural Practices and Beliefs

- Mr. Cáceres shared that he was “not familiar with any specific cultural practices and beliefs associated with the Poamoho project area.”



#### **5.2.2.2 Mr. (Nathan) Keola Grace**

The interview with Mr. Grace was conducted by Mr. Sproat from Honua Consulting, LLC on May 11, 2022. Mr. Grace shared the following information on cultural resources, practices, and beliefs:

##### **Cultural Resources**

- Mr. Grace shared that Kūkaniloko birthstones are “a significant cultural resource near the Poamoho project area”; however, the authors remind the reader that Kūkaniloko is located outside of the current study’s broad geographical area for the Poamoho project area.

##### **Cultural Practices and Beliefs**

- Mr. Grace was “not aware of any specific cultural practices and beliefs associated with the Poamoho project area.”

#### **5.2.2.3 Mr. Neil J.K. Hannahs**

The interview with Mr. Hannahs was conducted by Mr. Sproat from Honua Consulting, LLC on June 20, 2022. Mr. Hannahs shared the following information on cultural resources, practices, and beliefs:

##### **Cultural Resources**

- Mr. Hannahs shared that Kūkaniloko birthstones are a cultural resource “associated with the general area of the Poamoho project area”; however, the authors remind the reader that Kūkaniloko is located outside of the current study’s broad geographical area for the Poamoho project area.
- Mr. Hannahs stated the “waters of the Ko’olau Range that flow down to this high plateau create the headwaters for streams, provide opportunities for agriculture and rationalize investment in storage for flood control, irrigation, and recreation”; however, he did not provide specific locations for these resources.

##### **Cultural Practices and Beliefs**

- Mr. Hannahs shared no knowledge of cultural practices or beliefs associated with the Poamoho project area or the broad geographical area.

#### **5.2.2.4 Mr. Allen Hoe**

The interview with Mr. Hoe was conducted by Mr. Sproat from Honua Consulting, LLC on June 14, 2022. Mr. Hoe shared the following information on cultural resources, practices, and beliefs:

##### **Cultural Resources**

- Mr. Hoe was “not personally aware of any specific cultural resources associated with the Poamoho project area.”

### **Cultural Practices and Beliefs**

- Mr. Hoe was “not aware of any cultural practices and beliefs associated with the Poamoho project area.”

#### **5.2.2.5 Mr. Kyle Kajihiro**

The interview with Mr. Kajihiro was conducted by Mr. Sproat from Honua Consulting, LLC on June 15, 2022. Mr. Kajihiro also submitted a response via email attachment on behalf of Hawai'i Peace and Justice (of which he is a Board member) and Koa Futures. A summary of the cultural resources, practices, and beliefs within this letter is provided in Section 4.2.2.6 and the full letter is provided in the scoping comments in Appendix E of the O'ahu ATR EIS. Mr. Kajihiro shared the following information on cultural resources, practices, and beliefs:

### **Cultural Resources**

- Mr. Kajihiro was “not aware or familiar with any cultural resources in the Poamoho area.”

### **Cultural Practices and Beliefs**

- Mr. Kajihiro stated the landscape of Kūkaniloko, “the ancient piko of O'ahu chiefs” and “most sacred place on the island,” “radiates lines of connection outward to many points on the island, including Poamoho.” The authors remind the reader that Kūkaniloko is located outside of the current study's broad geographical area for the Poamoho project area.
- Mr. Kajihiro was informed by “Mr. Raymond Kamaka of Waikāne that the trail from Waikāne connects to Poamoho”; however, he did not provide a specific location for the trail.
- Mr. Kajihiro was informed by “Mr. Emil Wolfgramm, a renowned Tongan storyteller from Waiāhole, that the legendary hero Maui also has a connection to the trail that connects Waikāne to Poamoho”; however, he did not provide a specific location for the trail.

#### **5.2.2.6 Mr. Thomas Lenchanko**

The interview with Mr. Lenchanko was conducted by Mr. Sproat and Dr. Watson-Sproat from Honua Consulting, LLC on May 10, 2022. Mr. Lenchanko shared the following information on cultural resources, practices, and beliefs:

### **Cultural Resources**

- Mr. Lenchanko made it very clear that the State-owned land at Poamoho is “part of the traditional pu'uhonua of Kūkaniloko.” Kūkaniloko was “once the social and economic center of the island for ancestral Hawaiians.”
- Mr. Lenchanko stated that “the forested Poamoho area currently leased by the Army is a significant part of the natural watershed” and “the area should

be protected.” He added that “the forest itself is a cultural resource” and that “the plants, trees, birds were given to Hawaiians for them to make use of and implement in their daily lives.”

- Mr. Lenchanko believes there are cultural resources in the Poamoho project area, but he and other practitioners have not confirmed their presence.
- Mr. Lenchanko mentioned the “Poamoho area was known to have resources for lā’au lapa’au” (medicine) prior to the Army’s lease. However, he did not provide specific locations for these resources within the Poamoho project area.

### **Cultural Practices and Beliefs**

- Mr. Lenchanko shared that “the place name ‘Poamoho’ is a variation of ‘Po’o a mo’o’ which alludes to the relationship the people of that place had with mo’o akua,” who were “caretakers and guardians of water resources.” He stated that the “Poamoho area had three caretakers of water sources” and went through a progression of management: the menehune, the mo’o, and then humans.
- Mr. Lenchanko mentioned that areas like Poamoho relied on the land division system called ka’ānani’au, where families of O’ahu have the “shared responsibility of maintaining the land and resources and supporting genealogical descendants of Kūkaniloko and ali’i.”
- Mr. Lenchanko stated that “[t]raditional medicinal plants were gathered also in the uplands” of the Poamoho area. He added that other cultural practices tied to the land include hunting and resource gathering. He did not provide specific locations where these practices were taking place within the Poamoho project area or broad geographical area.
- Mr. Lenchanko discussed “how traditionally the people lived off the land and accessed parcels like Poamoho that were not generally easy to access or maintain” and “[t]his challenge was a part of learning to live off the land.” He continued that “[k]upuna would take younger generations to areas like Poamoho to teach them about the resources and pass on knowledge to the next generation.” He stated that “[i]n order to gather materials for lā’au lapa’au or procure water sources, Hawaiians had to access these difficult areas” and often pray “to ask for what was needed and the strength to get there.” Mr. Lenchanko explained that “he understands this as going into these places with nothing but coming out with spiritual knowledge about what it means to be a practitioner.”
- Mr. Lenchanko discussed the significance of “Halemano”, which is also called Helemano within the broad geographical area of the Poamoho project area. Mr. Lenchanko related that “Halemano makes up one-third of the Līhu’e/Wahiawā land section and is part of the 36,000 acres that makes up the pu’uhonua of Kūkaniloko. Halemano is a kalana significant to Kūkaniloko.” He explained that “these land sections and their boundaries reflect a traditional understanding of land use and management.”

### 5.2.2.7 Mr. Christophor Edward Oliveira

The interview with Mr. Oliveira was conducted by Mr. Sproat from Honua Consulting, LLC on June 5, 2022. Mr. Oliveira shared the following information on cultural resources, practices, and beliefs:

#### Cultural Resources

- Mr. Oliveira explained that “Poamoho is where many water resources originate”, “[w]ater is a significant cultural resource”, and “the two main water sources of Waialua come from the Poamoho area.” However, he did not provide specific locations for these water resources within the Poamoho project area or broad geographical area.
- Mr. Oliveira mentioned that “the Poamoho area is very sacred given that it was home to the Lo Ali’i” and “the places in this area are connected to Mā’ilikūkahi and also to Kūkaniloko.” However, he did not provide specific locations within the Poamoho project area or broad geographical area that are connected to Mā’ilikūkahi and Kūkaniloko.

#### Cultural Practices and Beliefs

- Mr. Oliveira named “kilo, or kilokilo, as a tradition connected to the Poamoho area.” He continues that “[k]ilo is practiced in the area to learn about the seasons and changing of times based on keen environmental observations.” He did not provide a specific location where this tradition was taking place within the Poamoho project area or broad geographical area.
- Mr. Oliveira explained that “the place name ‘Poamoho’ to be ‘Pō a Moho’ or the ‘night of Kāmohoali’i.” He further stated that “[t]his connects Poamoho to ‘Helemanō’” as “[m]anō is shark and Kāmohoali’i is a shark god.”
- Mr. Oliveira shared some significant place names in the broad geographical area of the Poamoho project area, including Pa’ala’a and Helemanō.
- Mr. Oliveira discussed Līhu’e as “a traditional land section that included Poamoho and Wahiwā,” and “[a]ll of these places are connected to each other through traditions and land sections” (note, the authors remind the reader that Līhu’e is not within the State-owned land at Poamoho or the current study’s broad geographical area). He explained that “these place names have various interpretations that allude to the significance of the place.”
- Mr. Oliveira shared the following traditions related to Kūkaniloko as being “connected to the Poamoho area”; however, the authors remind the reader that Kūkaniloko is located outside of the current study’s broad geographical area for the Poamoho project area. Mr. Oliveira explained that “many genealogies, including those of Kamehameha’s lineage, go back to Kila, the ancestor of many great rulers, including O’ahu’s Kākuhihewa. Kila was chosen by Moikeha to get La’amaikahiki, who brought the Hāwea drums to Kūkaniloko. These drums were pounded during the birth of Mā’ilikūkahi at Kūkaniloko.” He further explained that “Mā’ilikūkahi was of high rank, the ‘aiwohi kūkahi rank.”

### **5.3 IDENTIFIED CULTURAL RESOURCES, PRACTICES, AND BELIEFS**

This section provides a summary overview of cultural resources, practices, and beliefs identified for the Poamoho project area and the broad geographical area based on the results of archival research and consultation and interviews.

#### **5.3.1 Summary of Data Obtained from Archival Research**

There is limited archival data for cultural resources, practices, and beliefs associated with the State-owned land at Poamoho and the broad geographical area. Archival research produced one mo'olelo associated with Halemano who travelled through the area while fleeing from the ali'i 'Aikanaka. In the broad geographical area of the project area, Wahiwā was an area known as the home of chiefs, one of the most notable being Mā'ilikūkahi.

#### **5.3.2 Summary of Data Obtained from Survey and Interviews**

Data obtained from this project's initial community outreach and online survey produced information about the sharing of mo'olelo; mālama 'āina; traditional resource gathering, including for lā'au lapa'au; travel; and hunting. It is unclear from the survey results if these practices occur directly within the State-owned land at Poamoho or within the broad geographical area of the project area.

Seven individuals were interviewed for information on cultural practices and beliefs occurring within or associated with the Poamoho project area and the broad geographical area. Two of the seven interviewees (Mr. Oliveira and Mr. Lenchanko) discussed the practice and beliefs associated with mālama 'āina and traditional watershed management. Interviewees again commented on the forest and water resources as significant cultural resources (Mr. Oliveira and Mr. Lenchanko).

Other cultural practices identified by interviewees included the practice of kilo to observe environmental conditions (Mr. Oliveira), passing on of knowledge from kūpuna to the younger generation about living off the land (Mr. Lenchanko), gaining "spiritual knowledge about what it means to be a practitioner" by surviving in these remote landscapes (Mr. Lenchanko), and the sharing of mo'olelo associated with Kāmohoali'i, Mā'ilikūkahi, and mo'o akua (Mr. Oliveira and Mr. Lenchanko).

Mr. Lenchanko shared that traditional gathering practices for lā'au lapa'au as well as cultural practices associated with modern pig hunting would likely be practiced in the project area if unlimited access were allowed (see Section 7.4 for access discussion).

Lastly, three interviewees noted the cultural belief that the Poamoho project area is part of the traditional pu'uhonua of Kūkaniloko within the Traditional Hawaiian framework regarding the connection of wahi

(place) (Mr. Oliveira, Mr. Grace, and Mr. Lenchanko). The Poamoho area itself is also sacred and home to the Lo Ali'i, according to Mr. Oliveira.

While survey respondents and interviewees identified resources, practices, and beliefs, informants did not directly connect these resources to the specific geographical boundaries of the State-owned land at Poamoho (the project area). However, one interviewee asserted that cultural practices, such as traditional gathering practices for lā'au lapa'au and pig hunting, would occur within the project area if access were granted (see Chapter 7 for a discussion of current access policies).

#### **5.4 EFFECTS TO CULTURAL RESOURCES, PRACTICES, AND BELIEFS**

This section summarizes effects to cultural resources, practices, and beliefs from continued military activity in the Poamoho 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 Section 8.2.

Mr. Cáceres

- Impacts from lack of access.

Mr. Grace

- Not aware of any impacts to cultural resources, practices, or beliefs.

Mr. Hannahs

- Impacts to the environment and natural habitats.

Mr. Hoe

- Not personally aware of potential impacts from the Proposed Action.

Mr. Kajihiro

- "Adverse impacts on cultural practices include, but are not limited to restrictions on access due to security or safety restrictions, the destruction of cultural or religious sites, the destruction of environmental resources needed for conducting cultural practices, and the disruptions of the view plane and serenity of the area caused by military activities" (Kajihiro 2021:12).

Mr. Lenchanko

- Impacts from lack of access.

Mr. Oliveira

- Impacts from lack of access.

Impact concerns, as shared by the interviewees for the Poamoho project area, include three general categories: 1) impacts from lack of access (stated by four of seven interviewees), 2) general environmental impacts that were not always expanded upon (stated by two of seven interviewees), and 3) impacts from continued military training/activity (stated by one of seven interviewees). Two interviewees had no impact concerns to share for the Poamoho project area.

See Section 8.2 for an analysis of these potential impacts.

## 6 MAKUA MILITARY RESERVATION (MMR)

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The project area for MMR comprises approximately 782 acres situated along the Wai‘anae Coast of O‘ahu in the western portion of MMR and within the Wai‘anae District. This project area is situated within four ahupua‘a: Keawa‘ula, Kahanahāiki, Mākua, and ‘Ōhikilolo; it encompasses five TMK parcels (TMKs [1] 8-1-001:008 and [1] 8-2-001:001, 022, 024, and 025) and a portion of four parcels (TMKs [1] 6-9-003:001, [1] 8-1-001:007 and 012, and [1] 8-2-001:002) (Figure 22–Figure 24). The MMR parcels are also referred to as the Makai, North Ridge, Center, and South Ridge Tracts.

This chapter provides a cultural contextual overview of archival and interview data obtained for the MMR project area. Section 6.1 presents aspects of MMR’s natural environment, cultural landscape, and archival history, as well as summarizes findings from ethnographic studies conducted in the project area. Section 6.2 summarizes the responses received from the online survey as well as one-on-one interviews. Section 6.3 presents an overview of identified cultural resources, practices, and beliefs obtained from this research, and Section 6.4 discusses any adverse effects on these cultural resources, practices, and beliefs.

### 6.1 ARCHIVAL RESEARCH

Archival research was conducted for the natural environment, cultural landscape, archival history, and previous ethnographic interviews 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.

#### 6.1.1 Natural Environment

The project area for MMR is situated in Keawa‘ula, Kahanahāiki, Mākua, and ‘Ōhikilolo Ahupua‘a within the moku of Wai‘anae (see Figure 22). There are various environmental aspects within the MMR project area and the broad geographical area that have cultural significance. These are discussed below.

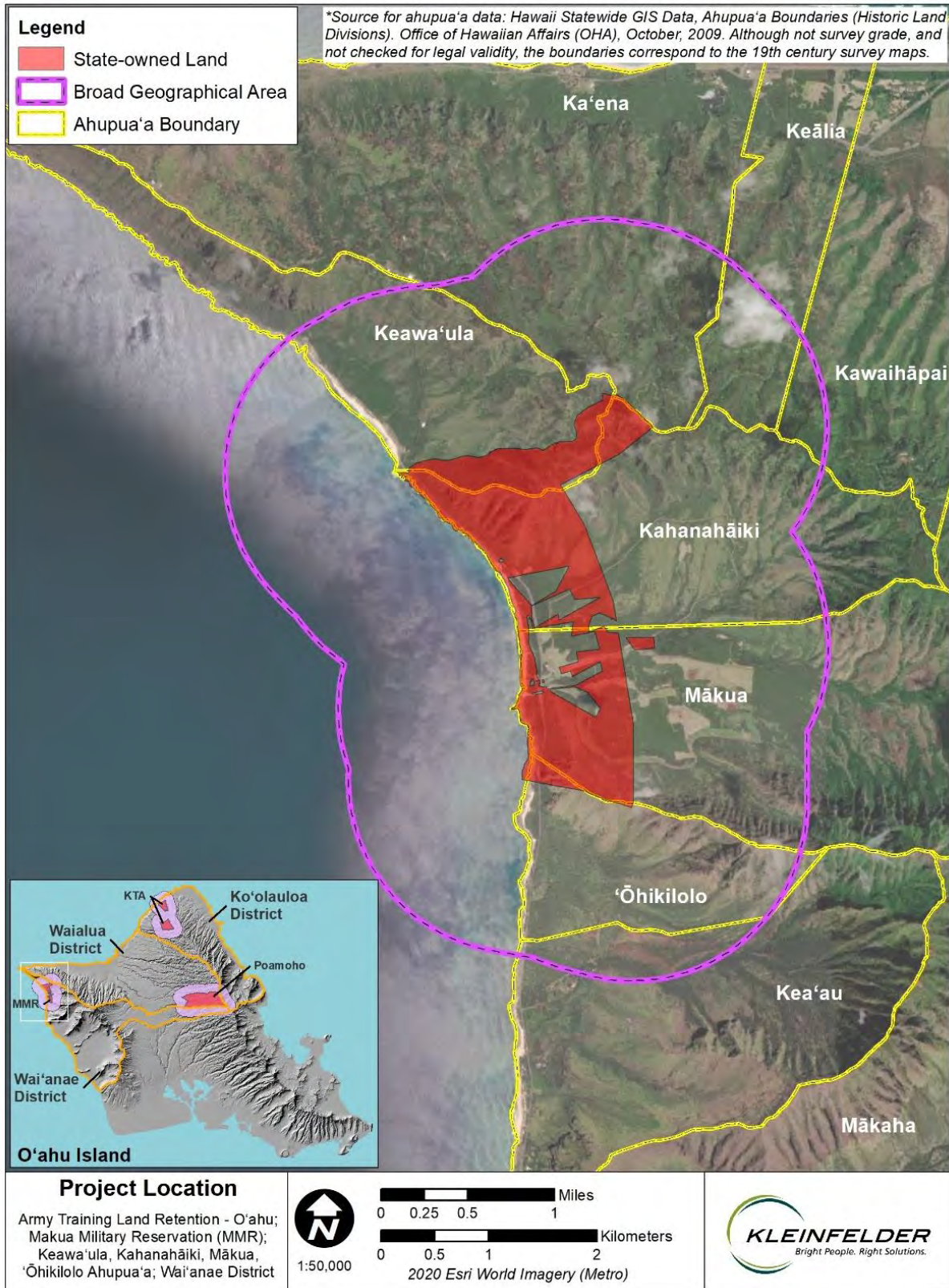
##### 6.1.1.1 Wai

There are four freshwater sources within the MMR project area and the broad geographical area: Kaluakauila Stream, Ko‘iahi (shown as Kaiahi on current USGS maps) Gulch, Mākua Stream, and Punapōhaku Stream (Figure 25). Kaluakauila Stream runs along and within portions of MMR’s northern boundary. Punapōhaku Stream is within the project area and flows through Kahanahāiki Ahupua‘a, which is adjacent to MMR. Mākua Stream runs into the Mākua Ahupua‘a and is partially within the project area. Ko‘iahi Gulch is partially within the southeastern portion of the MMR project area.





Figure 22. Overview of the State-owned land at MMR and the broad geographical area, shown on 2000 USGS DRG map.



**Figure 23. Overview of the State-owned land at MMR and the broad geographical area, shown on 2020 aerial imagery.**

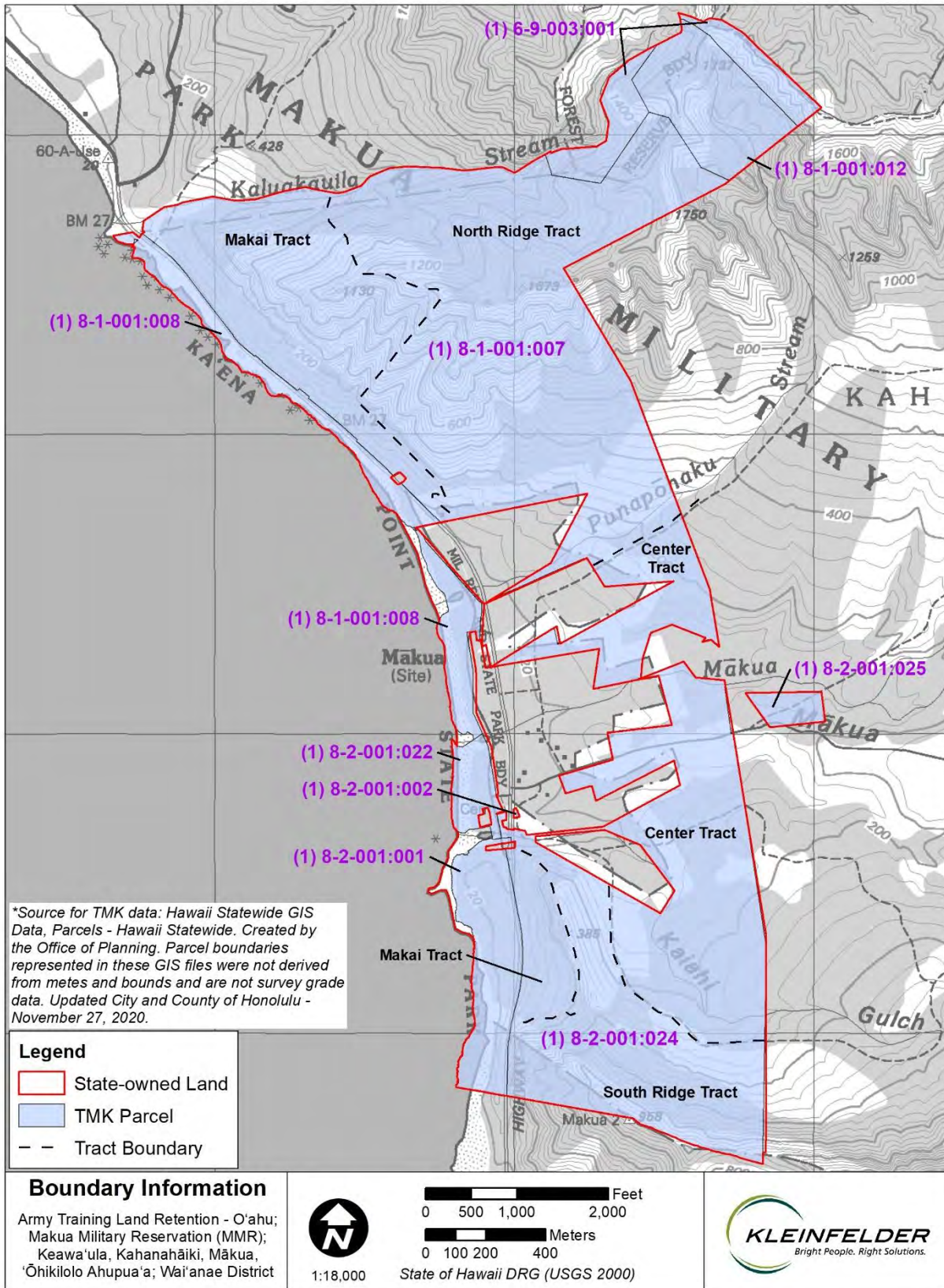
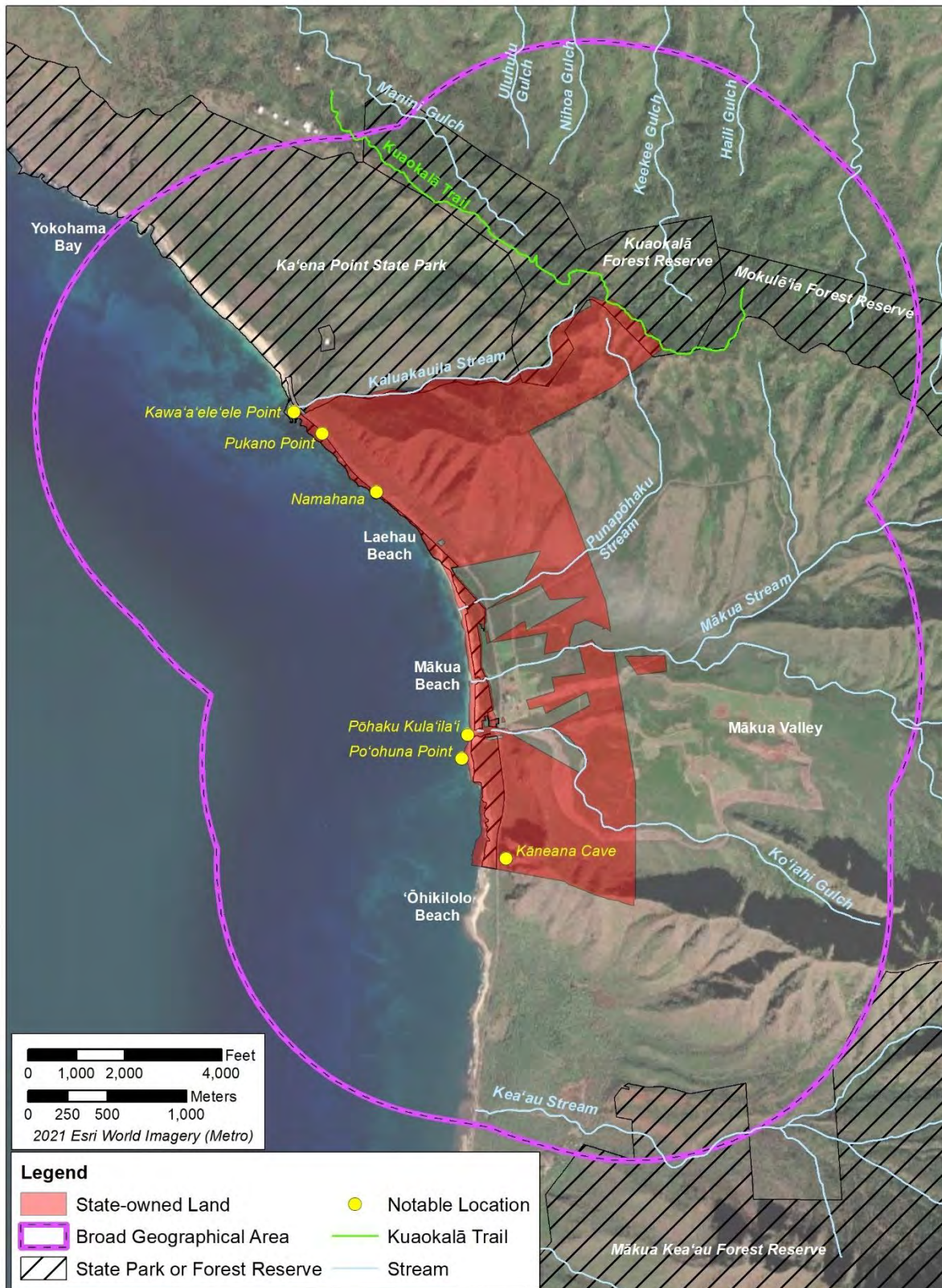


Figure 24. TMK and Tract information within the State-owned land at MMR.



**Figure 25. A sample of geological names and place names within the State-owned land at MMR and the broad geographical area.**

Tetsuro Ushijima (1996:69–70), a resident of Mākua during the 1920s and 1930s, wrote about three of these streams, which he called “rivers” as a child:

. . . first stream on the northside coming down the Kahanakaiki Valley was called “Punapohaku” stream. This stream was always dry, with hardly had any water coming down even after very heavy rains. . .

The second stream ran down the middle of the Valley . . . It was called “Makua Valley Stream” or “Lamaloa Kahawai” in Hawaiian. Lots of water flowed down this stream during heavy rains and no one could cross it in severe storms. . . There was also a brackish water pond at the end of the stream with mullets, aholeholes [Hawaiian flagtail, *Kuhlia sandvicensis*], ‘o‘opu [freshwater goby, Gobiidae], opai [sic], and black alamihi crabs [*Metopograpsus thukuhar*]. In the winter, small papio or manini would also be tossed into the ponds by rough seas.

The third stream was located on the . . . south end, of the Valley. It flowed down from the Koiahi Gulch, one of the wettest parts of the Valley. . . At the end of the stream was a brackish water pond, called “Loko Puuone” by the Hawaiians, with lots of small fishes and black crabs like the Makua Valley pond. . .

#### **6.1.1.2 Rains**

No specific rain names were identified for the MMR project area.

#### **6.1.1.3 Winds**

There are no winds associated with the MMR project area; however, there is a wind called Kaiāulu and a wind deity named Kaiona that are associated with the greater Wai‘anae area. Kaiāulu is said to be the “[n]ame of a pleasant, gentle trade-wind, famous in song, at Wai‘anae, O‘ahu. ‘*Olu‘olu i ka pā a ke Kaiāulu*’ (song), cool with the touch of the Kaiāulu” (Pukui and Elbert 1986:115). Kaiona is a wind goddess of Pu‘u Ka‘ala and a plain at Wai‘anae and believed “to help those lost in the forest by sending a bird to guide them to a trail leading to the lowlands” (Mitchell 2001:76).

#### **6.1.1.4 Pu‘u**

There are no pu‘u within the MMR project area. The closest is Pu‘u ‘Ōhikilolo, located approximately 425 meters southeast of the State-owned land at MMR. Archival research did not find any cultural resources, practices, or beliefs connected to this pu‘u.

#### **6.1.1.5 Traditional Plants**

Kiawe and koa haole (false koa, *Leucaena glauca*) are plant species currently found within the MMR project area with a connection to cultural practices and beliefs (USGS 2016). Although not native to Hawai‘i, kiawe has been used in agriculture and construction since the 1890s (Gallaher and Merlin 2010:504). More details on the history and uses of kiawe are located in Section 4.1.1.5 of this report.

Ushijima (1996:69–70) wrote of kiawe and maile vine within the broad geographical area of the MMR project area when he was living in Mākua during the 1920s and 1930s:

There were mostly kiawe trees and vine vegetation along the beach. Mauka of that, however, where most of the homes were located, were mostly patches of grass, weeds, and more kiawe trees. . . The kiawe tree (*Algaroba*) was very useful: the dry branches were used for firewood; the green branches were used to make charcoal; the larger branches were used for fence posts, and its beans were used for cattle, horse, or pig feed. . . Koiahi Gulch was also known for its “maile laulii,” a small variety of the maile vine, which was prized for its strong fragrance.

Koa haole (false koa, *Leucaena leucocephala*) is a non-native tree that was introduced in Hawai‘i around 1860 and has been used in agriculture and lei making (Brewbaker et al. 1972:3). The seed pods, stems, leaves, and tops, which are high in protein, have been used as cattle fodder in Hawai‘i since approximately 1915 (Neal 1948:360; Takahashi and Ripperton 1949:5). The seeds were used historically to make leis, purses, and mats (Neal 1948:360), and the seed pods were woven into baskets and hats (Kaihumua 1881:1).

### **6.1.2 Cultural Landscape**

Like Sections 4.1.2 and 5.1.2, the following sections discuss the tangible and intangible expressions of cultural beliefs and practices on the physical landscape of the project area and the broad geographical area.

#### **6.1.2.1 Inoa ‘Āina (Place Names)**

The meaning of specific place names within and adjacent to the project area are described below and are shown on Figure 25:

- Kahanahāiki: According to Andrews (1922:637), “Kahanahaiki” means “narrow Kahana.” It is also listed as “Kahaiki” in Figure 26.
- Kaluakauila: The name of this stream means “the kauila tree pit” (Pukui et al. 1974:78).
- Kāneana: The name of this large cave means “Kāne’s cave” (Pukui et al. 1974:84).
- Kawa‘a‘ele‘ele: No translation found.
- Kuaokalā: According to Pukui et al. (1974:119), “Kuaokalā” is a “land section, forest reserve, and ancient heiau site overlooking Ka‘ena Point” and means “back of the sun.”
- Keawa‘ula: This name applies to a land division, cave, and beach park, and it means “the red harbor (said to be named for numerous cuttlefish [mūhe‘e] that color the water)” (Pukui et al. 1974:105).

- Ko’iahi: The name of this gulch/land section means “fire adze” and is where the “finest maile-lau-li’i formerly grew” (Pukui et al. 1974:115). Ko’iahi is also referred to as “Kaiahi” on USGS maps starting from 1954.
- Kula’ila’i: According to Pukui and Elbert (1986:179), “kula’ila’i” is a reduplication of kula’i, which means “to push over, knock down, overthrow, shove, push to one side.” This place name is associated with a small island north of Po’ohuna Point.
- Laehau: No translation found.
- Mākua: This name applies to the land section, village, cave, stream, valley, and beach. The name literally translates to “parents” (Pukui et al. 1974:143).
- Namahana: According to Andrews (1922:661), “Namahana” means “pair of things.”
- Ōhikilolo: The name applies to a pu’u, land section, and beach, and it means “prying out brains” (Pukui et al. 1974:168). However, according to Andrews (1922:662), “Ohikilolo” is a “species of sand crab.” It is also referred to as Nahikilolo on Figure 26.
- Po’ohuna: According to Pukui and Elbert (1986:341), “po’o huna” means “hidden, mysterious, invisible, as the gods.”
- Pukano: No translation found.
- Punapōhaku: This stream name means “rocky spring” (Pukui et al. 1974:194).

The MMR project area is located primarily within the ahupua’a of Kahanahāiki and Mākua in the moku of Wai’anae on the Island of O’ahu. Kahanahāiki Ahupua’a abuts Mākua Ahupua’a to the north. Additionally, a portion of the State-owned land crosses into Ōhikilolo Ahupua’a to the south of Mākua Ahupua’a and also into Keawa’ula Ahupua’a to the north of Kahanahāiki Ahupua’a (see Figure 22).

### 6.1.2.2 Mo’olelo

Mo’olelo relating to Mākua is extensive and includes numerous accounts of akua and ali’i. Presented here is an overview of mo’olelo that relate to the MMR project area. For a more in-depth review of Mākua’s mo’olelo, see Kelly and Quintal (1977) and Gollin et al. (2013).

Mākua Valley, which encompasses the ahupua’a of Mākua and Kahanahāiki, is said to be the meeting place of Papahānaumoku (Earth Mother, who gave birth to the islands) and Wākea (Sky Father) (Gollin et al. 2013:34). Mākua is also said to be the traditional home of ‘ōlohe (professional robbers) who could break bones (Fornander 1918–1919:490).

*Ka Mo’olelo O Hi’iakaikapoliopole* mentions the Mākua area. The mo’olelo focuses on Hi’iakaikapoliopole (Hi’iaka), Pele’s youngest and favorite sister, and her journey to retrieve Pele’s lover, Lohi’au from Kaua’i. Hi’iaka and her traveling party landed on Mākua Beach via canoe and the residents of Mākua held a welcoming feast, which included “the poi ‘uwala [sic] (sweet potato poi), the pieces of pig, the wana

(urchins), the 'ina (small urchins) in their gravy, poke uhu momona (raw fish made of the rich parrot fish) . . ." (Nogelmeier and Ho'oulumāhiehie 2006; Maly and Maly 2003:211). Hi'iaika chanted this prayer over the food, which mentions places within the MMR project area (Maly and Maly 2003:211–212):

O Mākua, land of Maile-lauli'i,  
Land loved by Ko'iahi in the uplands,  
My journey takes me over land,  
In the dazzling heat of the sun,  
Sun which descends below Wai'anae,  
The fragrant sprouts of the kupukupu, fern are loved by me  
The thought of them two is to eat,  
Partake in the food made with love,  
I have eaten my companions,  
Of the food without a voice, there is, only one voice  
Come, come partake,  
That the journey of the companions may be continued  
Ua 'ike iho la nō ho'i i ke one 'ōiopio. (So seen are the fine clean sand of Mākua)!

Kāneana (Mākua) Cave, located within the State-owned land at MMR, is associated with sharks, according to mo'olelo. The cave is said to have been the "dwelling place of a shark goddess who held sway from Keana Point to Kepuhi Point" and took the form of a woman when entering the cave via a sea entrance (McAllister 1933:123). Another story mentions a shark man named Nanaue who lived near Kāneana Cave; he was the son of Kāmohoali'i, the king of all sharks living in Hawaiian waters, and Kalei, a beautiful maiden (Kelly and Quintal 1977:21). In an interview conducted by Kelly and Quintal (1977:22), the informant mentioned a mo'ō (lizard) of Mākua Valley that was the girlfriend of this shark man:

The stream comes down to the shore from Koiahi. It is that stream where the mo'ō comes down when the heavy rains fall and the stream is full of water. She came down to meet her boy friend, the shark from Kaneana Cave. When the stream flows strong it breaks through the sand on the beach. That is when the mo'ō goes into the sea and goes on that big rock [Pōhaku Kula'ila'i] next to the blowhole at the Waianae end of the beach. . . The shark would come from Kaneana Cave through the undersea entrance and swim to the reef just outside of the blowhole. . . When the mo'ō goes into the stream all the greenery covers the water and that is when we know she is there. When she is there, we are not supposed to go swimming in the stream and disturb her. When she goes out, the water is clear. . .

Mo'olelo describe a traditional line of chiefs with ties to the project area. One such chief was Pau, the son of Hua; Pau was born in 'Ōhikilolo, which belonged to his mother Hikimolulolea, and ruled from 'Ōhikilolo Ahupua'a to Keawa'ula Ahupua'a, including the State-owned land at MMR (Sterling and Summers 1978:83). Pau's son, Hua-nui-i-ka-lāla'ila'i, was also born in 'Ōhikilolo (Malo 1951:247). Using varying generation-count theories, Hua-nui-i-ka-lāla'ila'i ruled somewhere between the early eighth and the mid-eleventh centuries (Kelly and Quintal 1977:21).



Two place names within the State-owned land at MMR, Mākua and Ko’iahi are associated with ‘ōlelo no’eau:

Mākole iho hewa i Mākua.

*Red-eyed one goes to Mākua by mistake.*

Applied to one who has gone off his course. Once, a red-eyed person left Mokulē’ia, O’ahu, intending to go to Mākaha, but went by way of Kawaihāpai and arrived at Mākua instead. [Pukui 1983:230]

Maile lau li’i o Ko’iahi.

*Fine-leaved maile of Ko’iahi.*

Often used in chants. The fine-leaved maile of Ko’iahi, in Wai’anae, was considered the best on O’ahu for beauty and fragrance. After the introduction of goats this beautiful and much-liked vine vanished. [Pukui 1983:225]

### **6.1.2.3 Archaeological Sites**

Twenty archaeological sites are recorded at least partially within the MMR project area: Sites 50-80-03-0177, 0181, 4541, 4543 to 4546, 5734, 5735, 5775 to 5777, 5925 to 5927, 5930 to 5932, 9525, and 9533. These archaeological sites are comprised of dry-stone stacked walls, mounds, terraces, a lithic scatter, petroglyph, and other constructed features. Their presence is indicative of associated cultural practices and beliefs, such as spiritual ceremonies; uhaū humu pōhaku; traditional agricultural and subsistence practices; and ka’apuni. Four of these sites are Traditional Hawaiian (Sites 0177, 0181, 4546, and 5735), six sites contain a combination of Traditional Hawaiian components and Historic Period re-use (Sites 4543 to 4545 and 5775 to 5777), and four sites are Historic Period (Sites 4541, 5927, 9525, and 9533). Six additional resources (Sites 5734, 5925, 5926, and 5930 to 5932) have been recorded in the project area and have yet to be determined if there is any cultural and temporal association.

Kāneana (Mākua) Cave (Site 0177) is a natural sea cave associated with cultural practices and beliefs. As stated in the previous section, the cave is associated with mo’olelo about various shark gods (Kelly and Quintal 1977:21–22). The site is also associated with ceremonial practices, such as visiting the cave to leave offerings for one’s ‘aumākua (family or personal deity or deified ancestor) who resided there (Gollin et al. 2013:78, 85). There is also a traditional belief that the cave is the location of the birth of the first human (Gollin et al. 2013:95). According to one informant from the Gollin et al. (2013:115) study, iwi kūpuna were also once interred and cared for in the cave.

The Ukanipō Heiau Complex (Site 0181) is also situated partially within the MMR project area. It is a terraced structure of dry-stone construction and is the paramount Traditional Hawaiian-constructed site in the MMR project area. According to mo’olelo, “Ukanipō was dedicated to the sounds of birthing,

announcing the passage into life” (Gollin et al. 2013:36). The site was traditionally accessed for prayer before the area was closed to public access (Gollin et al. 2013:92).

Four sites are located within the Ko’iahi Gulch Complex (Sites 4543 to 4546) and at least partially within the MMR project area. The Traditional Hawaiian components of these sites include habitation and agricultural complexes with walls, alignments, enclosures, mounds, terraces, C-shaped structures, a fire pit, a petroglyph, and artifacts (such as a complete adze and an ‘ulu maika) (Eblé et al 1995:7-39–7-56; Williams et al. 2001:22–31). Radiocarbon dating at Site 4546, a Traditional Hawaiian irregularly shaped enclosure, indicates calendric dates ranging from the fifteenth to the mid-seventeenth centuries (Williams et al. 2001:31). Sites 4543 to 4545 show signs of use within the Historic Period as well. Approximately 375 meters west the Ko’iahi Gulch Complex is a small lithic scatter (Site 5735) located within the MMR project area, which included “edge-altered” basalt flakes and a core that were likely sourced from a nearby fractured rock (Williams et al. 2001:33).

Several large habitation complexes with Historic Period re-use (Sites 5775 to 5777) are located along the lower segments of Punapōhaku Stream in the vicinity of Ukanipō Heiau and partially within the MMR project area. These sites are comprised of more than 190 features within a 35-acre plus area (Cleghorn et al. 2002:33–61). Many of these surface features are constructed of stacked basalt boulders which form walls, enclosures, terraces, mounds, and platforms that would have functioned as permanent and temporary dwellings and activity areas, agricultural plots, and ceremonial and possible burial areas. Agricultural features, including earthen terraces, mounds, and retaining walls, were likely used to cultivate dryland, non-irrigated crops such as ‘uala, kō, and ipu (bottle gourd, *Lagenaria siceraria*).

Historic Period sites (Sites 4541, 5927, 9525, and 9533) both fully and partially within the MMR project area are associated with nineteenth and early-twentieth centuries ranching and agricultural activities and the delineation of property boundaries (e.g., LCA boundary walls). Some historic features (i.e., long wall segments) were likely constructed from basalt boulders that were quarried from abandoned Traditional Hawaiian structures (Cleghorn et al. 2002:127).

#### **6.1.2.4 Trails**

According to ʻĪʻĪ (1983:97), there was a beach trail along the shore at Mākua that went around all of O’ahu. To the south, this trail passed Mākaha and Pu’uokapolei, and to the north it continued around Ka’ena Point to Waialua and beyond. There was also a known mountain trail that began at Kahanahāiki, passed over the mountain to Kawaihāpai, then joined the previously mentioned shoreline trail from Ka’ena (ʻĪʻĪ 1983:98) (Figure 26).



**Figure 26. Portion of trails of leeward O’ahu map from ʻĪʻĪ (1983:98) showing Mākua coastal and mountain trails.**

Kuaokalā Trail is a 2.5-mile-long trail that runs along the northeast border of the North Ridge Tract (see Figure 25). The trail requires a DLNR day use permit for access, which is obtained via an online permit system or by mail, and the trail is accessed via the Ka’ena Point Satellite Tracking Station Road or the Kealia Access Road and Trail (DOFAW 2022e, 2023). The Nā Ala Hele Trail and Access Program website provides this history of the trail (DOFAW 2022e):

In June 1913 the Territorial Governor established Kuaokala Forest Reserve to protect a spring near the head of Manini Gulch below the parking lot. Over the years, cattle ranchers, forestry workers, and hikers developed various trails in the Kuaokala area, one of which was this ridge route.

### **6.1.3 Archival History**

An overview of three main historical eras as they relate to the MMR project area is presented in the following three sections. For a more in-depth review of Mākua’s archival history, see Kelly and Quintal (1977) and Gollin et al. (2013).

#### **6.1.3.1 Traditional Historical Context**

Mākua’s history prior to foreign contact is not well-known; however, the most likely land uses were fishing along the beach and agriculture in the lower valley and adjacent plateau (Kelly and Quintal 1977:25).

Traditional Hawaiian populations in Mākua and Kahanahāiki Ahupua‘a at the time of contact are estimated to have been around 300 to 400 (Kelly and Quintal 1977:33) or 420 individuals (Cordy 2002). Therefore, traditional communities along the Mākua Coast may have been sparse and likely engaged in dryland cultivation of ‘uala, which is supported by early ethnographic accounts (Handy and Handy 1991:275). ‘Uala, kalo, and pili grass (*Heteropogon contortus*) have all been documented as important resources in Mākua Valley (Kelly and Quintal 1977:16, 18); although it is unknown from archival research how much they were cultivated in the State-owned land at MMR.

According to ʻĪʻĪ (1983:98), traditional fishing grounds for aku and ‘ahi (Hawaiian yellow-fin tuna, *Thunnus albacares*) were located at Kahanahāiki (called Kahaiki) and Keawa‘ula. In the early 1800s, there was a fishing village on the Mākua-Kahanahāiki seashore reported by Levi Chamberlain, a missionary who inspected schools on O‘ahu. This was likely a traditional fishing village; however, the lack of archaeological investigations in the area has made determining the age of this now-destroyed village difficult (Kelly and Quintal 1977:33). The Mākua area was also renowned for ‘ōpelu (mackerel scad, *Decapterus macarellus*) and akule (big-eye scad, *Selar crumenophthalmus*) fishing using canoes and nets (Cordy 2002:120).

Canoe and other small seacrafts offered an important mode of transportation for Mākua residents (Kelly and Quintal 1977:4). The fine sand beach at Mākua was used for fishing canoe landings; travelers would sleep at Mākua before heading toward Ka‘ena Point in the morning (ʻĪʻĪ 1983:98). Leaving for Ka‘ena Point from Mākua allowed travelers to avoid “the rough, hot, overland trail around land’s end” (Kelly and Quintal 1977:4).

A heiau called Kumuakuopio (Site 50-80-03-0178) existed mauka of the now-destroyed Mākua Protestant Church (McAllister 1933:123). At the time of McAllister’s 1930 survey, there was nothing left of this heiau “except a sand platform 120 by 100 feet that is about 20 feet higher than any of the surrounding land.” In the center of this sand platform, McAllister observed two piles of one-foot stones, but all the rest of the stones were likely used to build rock walls in the area (McAllister 1933:123). The location of the Kumuakuopio “sand platform,” a naturally uplifted area of old reef and beach rock sandstone, was confirmed to exist within Site 50-80-03-5926 (within the broad geographical area of the MMR project area) by Mālama Mākua founder Leandra Wai and other consulting parties to former USAG-HI Cultural Resources Manager (CRM) Laurie Lucking (D. Crowley, USAG-HI, personal communication, September 2022).

Kahanahāiki Ahupua‘a was known for two heiau: Kaahihi (Site 50-80-03-0180) and the previously discussed, still present Ukanipō (Site 0181) (McAllister 1933:123–125). As with Kumuakuopio, the stones at Kaahihi had been removed by the time of McAllister’s survey, with only scattered stones and some lower wall remnants present; however, the presence of the heiau was still evident in the 100-foot square, 25-foot-high earthen mound (McAllister 1933:123). It was said that drums could still be heard from this heiau (McAllister 1933:123). The exact location of Kaahihi is not known today.

According to McAllister (1933:123), there was one ko‘a (Site 50-80-03-0179) that was the only thing not covered during high tide at the center of Mākua Beach and within the MMR project area (see Figure 33). It was rectangular, measuring approximately 55 by 35 feet, and in 1930 it had “fairly well-preserved north and east walls” (McAllister 1933:123). McAllister (1933:123) further describes the different aspects of the fishing shrine, which, according to an informant’s interview by Kelly and Quintal (1977:31), was later destroyed by the military:

In the northeast corner, a platform 20 by 4 feet projects some 2 feet out and above the other walls. The north wall is built of waterworn stones from 2 to 3 feet high, and inside, the sand is flush with the wall and slopes up to a central portion that is 3 feet higher. The south wall, parallel to the sea, and the west wall have been obliterated. Coral lies about the site.

### **6.1.3.2 Post-Contact and Kingdom History**

An early historical account of Mākua by Chamberlain in the 1820s describes it as a small treeless coastal settlement planted with ‘uala and kō:

Makua is situated on a sand beach and opens to the sea between two bold head lands S.E. and N.W. The mountains rise in a circular manner and on the North have a slope to the valley, on the east of the mountains are more precipitous, the summits of all the ridges which overlook this valley are very steep and broken. There are no trees in this place, a few clusters of sugar cane are seen here and there, potatoes are cultivated but not taro. [Chamberlain, in Sterling and Summers 1978:84]

Communities along the Wai‘anae Coast during the decades following foreign contact continued to be small. An 1826 sketch of Mākua by Hiram Bingham depicts a small coastal community near the shore and a few scattered structures mauka or inland and upland from the shore (Figure 27). On an 1851 Hawai‘i Registered Map, fisheries are shown extending one mile out to sea from the coastline at Mākua and Kahanahāiki (Kelly and Quintal 1977:33) (Figure 28).

According to OHA’s Kipuka database, a total of 23 land claims were awarded as a result of the 1848 Māhele ‘Āina in two of the four ahupua‘a that comprise the State-owned land at MMR: 11 in Mākua, nine in Kahanahāiki, and three located within both Mākua and Kahanahāiki (Figure 29; Table 4). Only one LCA (LCA 9052:1) is situated within the MMR project area, which was awarded to Kahueai in 1851 as Grant 461 (see Figure 29). LCA 9052:1 mentions the word “kula,” likely a reference to cultivated land, while LCA 9052:2, located within the broad geographical area, is described as a “house lot.” Several other land claims awarded within the broad geographical area also contained multiple, discontinuous ‘āpana (land parcels). Many of the smaller ‘āpana near the shoreline are described in LCA documents as house lots, while the larger upland ‘āpana are “kula” lands likely used for farming or ranching (see Table 4). This is evident in



Figure 27. Bingham's 1826 sketch of Mākua Valley, from Green (1980:9).

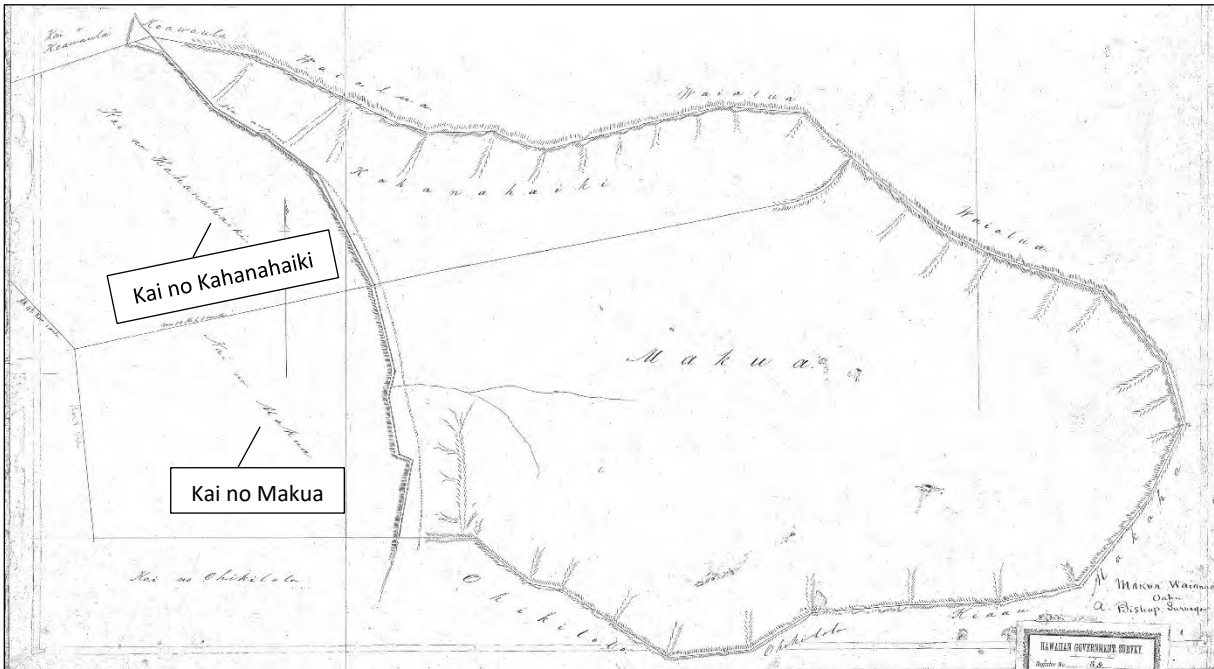
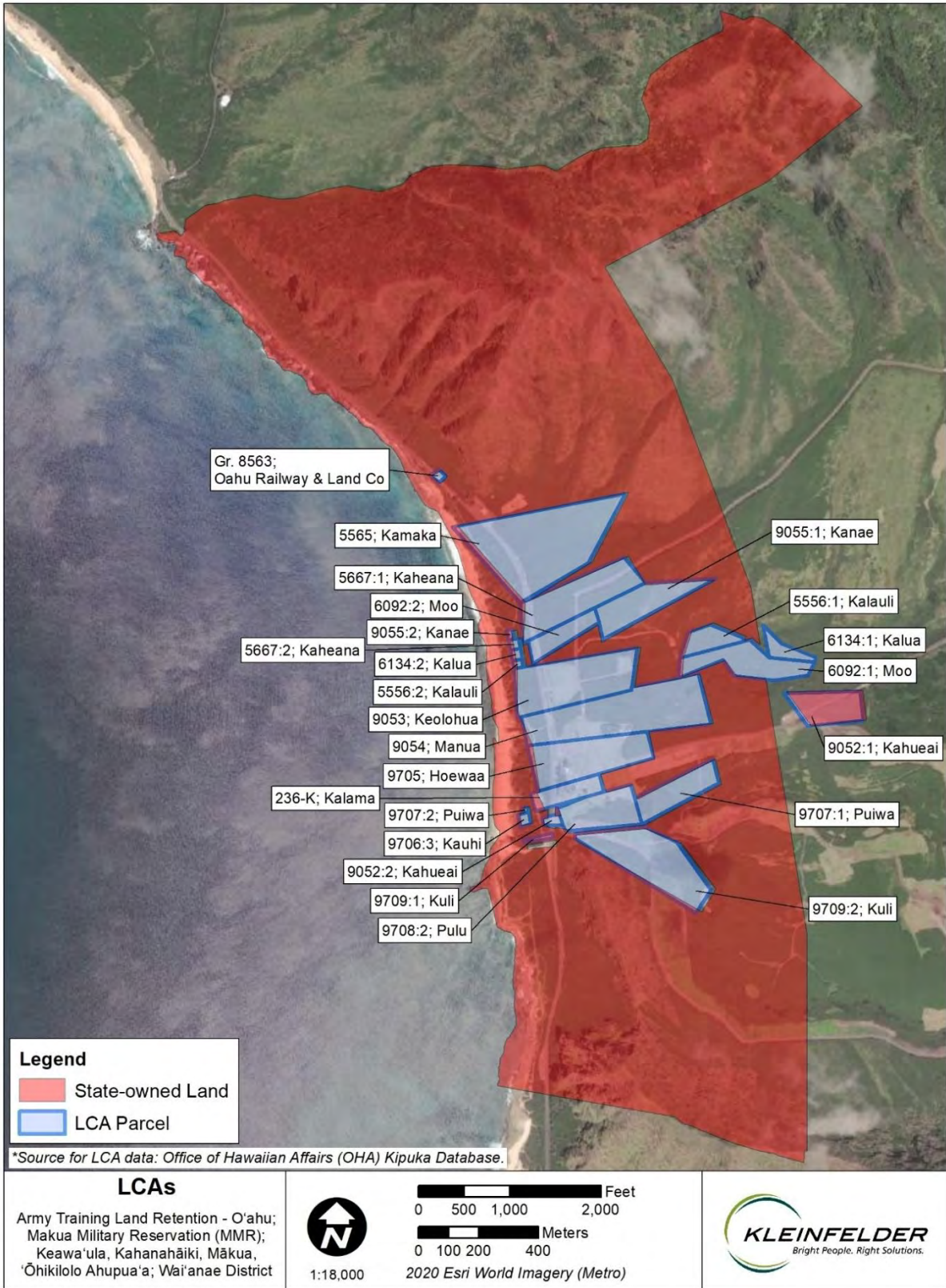


Figure 28. 1851 Registered Map 89 showing fisheries at Mākua and Kahanahāiki.



**Figure 29. LCAs within the State-owned land at MMR and the adjacent land parcels, shown on 2020 aerial imagery.**

**Table 4. LCAs Within the State-owned Land at MMR and the Adjacent Land Parcels**

LCA NO.	AWARDEE	TOTAL ACRES*	AHUPUA'A	PLACE; DESCRIPTION**
236-K	Kalama	3.136	Mākua	Haunouli; Kula mahi'ai and house lot.
5556:1, 2	Kalauli	3.63	Kahanahāiki	'Āpana 1: Kapalai; Ili 'āina called Kapalai. 'Āpana 2: No information available.
5565	Kamaka	23.94	Kahanahāiki	Kahanaiki; Kula mahi'ai.
5667:1, 2	Kaheana	12.53	Kahanahāiki	'Āpana 1: Kahanaiki; Kula 'āina in Kahanaiki. 'Āpana 2: Kawaioe; House lot in Kawaioe.
6092:1, 2	Moo	10.732	Mākua, Kahanahāiki	'Āpana 1: Pohaku o Kamaile; Kula 'āina. 'Āpana 2: No information available.
6134:1, 2	Kalua	2.169	Kahanahāiki	'Āpana 1: Kaoawa; Kula mahi'ai in Kaoawa. 'Āpana 2: Kaaueka; House lot in Kaaueka.
9052:1 <sup>+</sup> , 2	Kahueai	7.680	Mākua	'Āpana 1: Kaohai; Kula mahi'ai in Kaohai. 'Āpana 2: Pakalaua/Pakalana; House lot in Pakalaua/ Pakalana.
9053	Keolohua	12.922	Mākua, Kahanahāiki	Kulaelawa; Kula mahi'ai in Kulaelawa.
9054	Manua	18.100	Mākua	Kalena; Kula mahi'ai in Kalena. Kahanahāiki Stream flows east to west through parcel.
9055:1, 2	Kanae	9.64	Kahanahāiki	'Āpana 1: Punapohaku; Kula mahi'ai in Punapohaku. 'Āpana 2: Keawaioe; House lot in Keawaioe.
9705	Hoewaa	14.931	Mākua	Haunouli; Kula mahi'ai in Haunouli.
9706:3	Kauhi	0.380	Mākua	Kihanau; House lot in Kihanau.
9707:1, 2	Puiwa	6.336	Mākua	Kihanau; No information available.
9708:2	Pulu	7.100	Mākua	Koiahi; Kula 'āina in Koiahi.
9709:1, 2	Kuli	14.967	Mākua	'Āpana 1: Kaawa; House lot in Kaawa. OR&L bisected this parcel; there's a spring that runs the length of the parcel to the east. 'Āpana 2: Loilima; Kula 'āina in Loilima. A stream flows through the northeast portion of the parcel.

\* Acreages from Kelly and Quintal (1977:Tables 3 and 4, pp35–36).

\*\* Descriptions adapted from Gollin et al. (2013:Table 1, pp18–21).

<sup>+</sup> Within MMR project area.



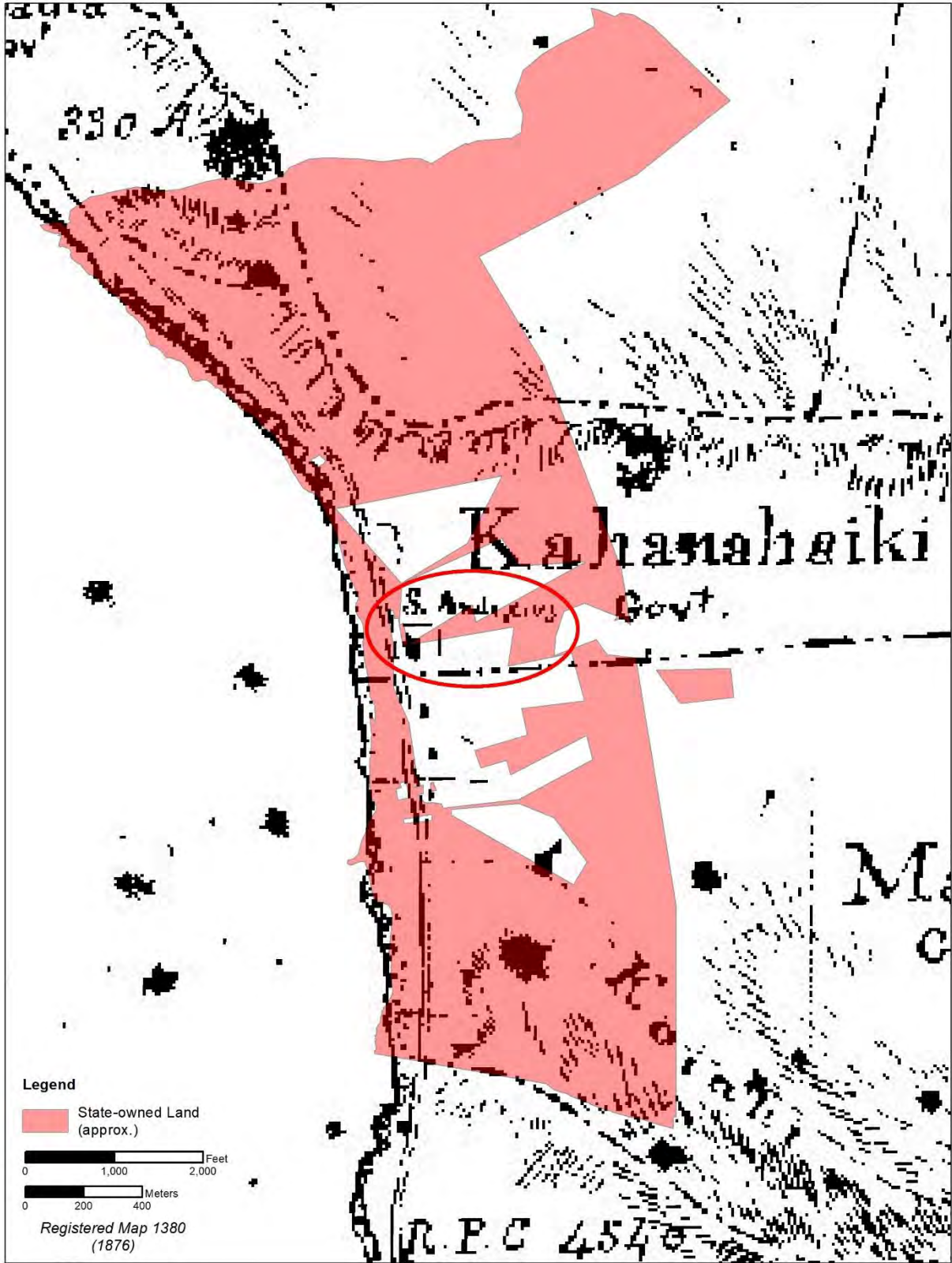
the description of LCA 9055, associated with two ‘āpana bounded by the project area, which mentions a house within the smaller coastal parcel (9055:2) and “mahī‘ai” (farm) on the upland ‘āpana (9055:1) (see Table 4).

### **6.1.3.3 Agricultural and Subsistence History**

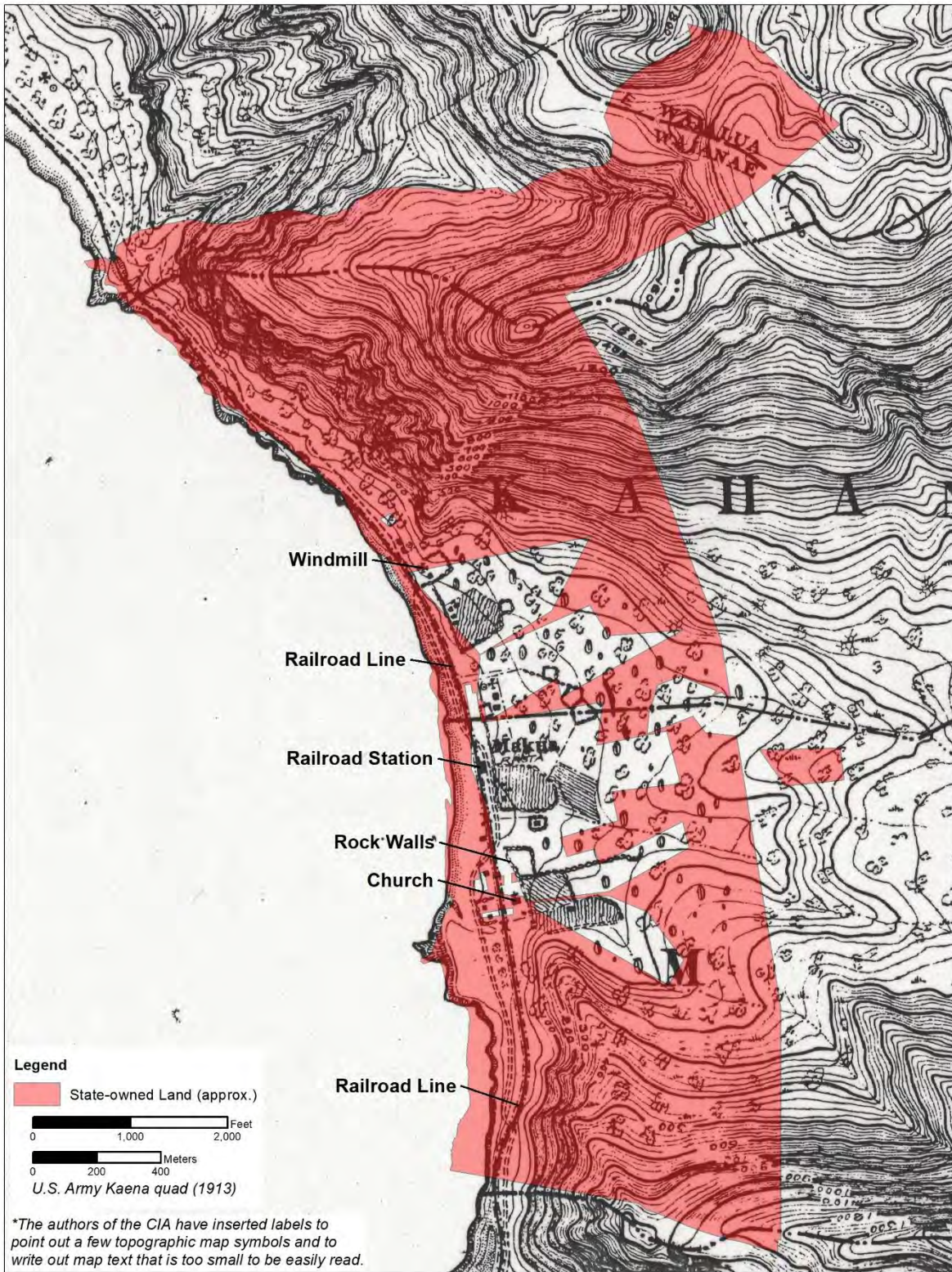
An early historical account by Chamberlain from the 1820s describes Mākua as a small treeless coastal settlement planted with ‘uala and kō (Chamberlain, in Sterling and Summers 1978:84), and LCA documents from the 1840s and 1850s mention “kula” lands within the MMR project area and the broad geographical area (see Section 6.1.3.2). Fishing was also a form of subsistence for the coastal community as fisheries are shown extending one mile out to sea from the coastline in the ahupua‘a of Mākua and Kahanahāiki on an 1851 Hawai‘i Registered Map (see Figure 28).

The first recorded lease of Mākua Valley, General Lease No. 113, which included the MMR project area, was issued to Joseph and John Booth in 1864 (Kelly and Quintal 1977:39). The lease was transferred to Samuel Andrews after the deaths of the Booth father and son, and by 1873, Andrews was “ranching the entire area of approximately 4,200 acres of land,” including the ahupua‘a of Mākua, and raising pigs, cattle, and horses (Kelly and Quintal 1977:39, 45). Andrews built his family house at Kahanahāiki on the land parcel originally awarded as LCA 9053 to Keolohua (Zulick and Cox 2001:15). Andrews’ claim is illustrated on an 1876 map of O‘ahu (Figure 30). Andrews’ Mākua Ranch was described in Bowser’s 1880–1881 directory and tourists’ guide: “Here the hills recede again from the shore line, and the scenery is once more delightful. The soil is good; close to the homestead I saw growing as fine a patch of Indian corn as I could wish to see. . . In this vicinity I found an abundance of cacti, and on the mountains a grass called by the natives pili, celebrated for its durability when used for thatching purposes” (Bowser 1880:491). In addition to Mākua Ranch, Andrews built the first church in Mākua Valley, the Mākua Protestant Church, near the ocean in Mākua (Figure 31). According to an informant from the Kelly and Quintal (1977:70, 72) study, the original church was moved out of Mākua Valley and another wooden church was built in its place.

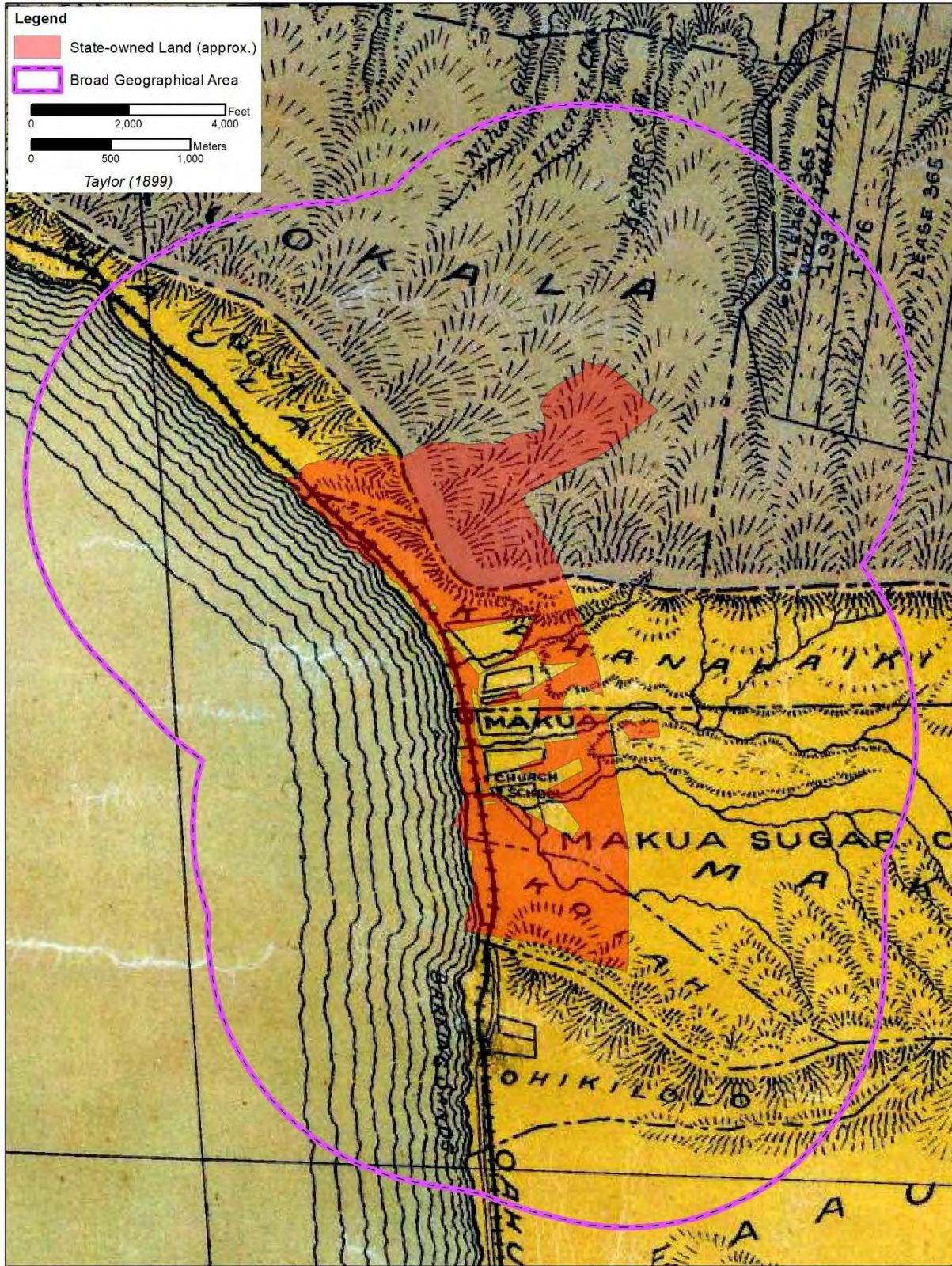
A portion of an 1899 map of O‘ahu provides a glimpse of the land use within the State-owned land at MMR and the broad geographical area: the Makua Sugar Company is illustrated in Mākua Ahupua‘a, along with a railroad, church, and school (Figure 32). Research to obtain further information about Makua Sugar Company or any sugar plantations within the State-owned land at MMR and the broad geographical area was unsuccessful; there are no records of commercial sugar production in Mākua Ahupua‘a. According to local informants, the lower portions of Mākua Valley were favorable for growing cucumbers, watermelons, pumpkins, sweet potatoes, cotton, tobacco, and corn (Kelly and Quintal 1977:55).



**Figure 30. Portion of Hawai'i Registered Map 1380 (Lyons 1876) showing Samuel Andrews' homestead (circled in red) in 1876.**



**Figure 31. Portion of 1913 Army map showing agricultural fields, a church, windmills, rock walls, railroad line, and a railroad station (“RRSTA”) within and adjacent to the State-owned land at MMR.**



**Figure 32. Portion of Taylor’s (1899) map of O’ahu showing the State-owned land at MMR and the broad geographical area.**

Lincoln L. McCandless took over the Mākua Valley lease on February 21, 1910 (Kelly and Quintal 1977:40). Except for a few years when it was leased to Frank Woods, the ahupuaʻa of Mākua and Kahanahāiki, including the MMR project area, remained under control of McCandless Ranch. During Woods' brief ownership of the lease, McCandless "obtained deeds to or interest in several kuleana lands" located in the ahupuaʻa of Keawaʻula, Kahanahāiki, and Mākua; McCandless owning land on Woods' ranch made Woods' operations difficult and led to McCandless retaking the Mākua Valley lease (Kelly and Quintal 1977:41). During the tenure of Mākua Ranch, cowboys were hired to rope wild cattle and exterminate wild pigs, which were both widespread in the hills and forests of Mākua Valley (Kelly and Quintal 1977:53).

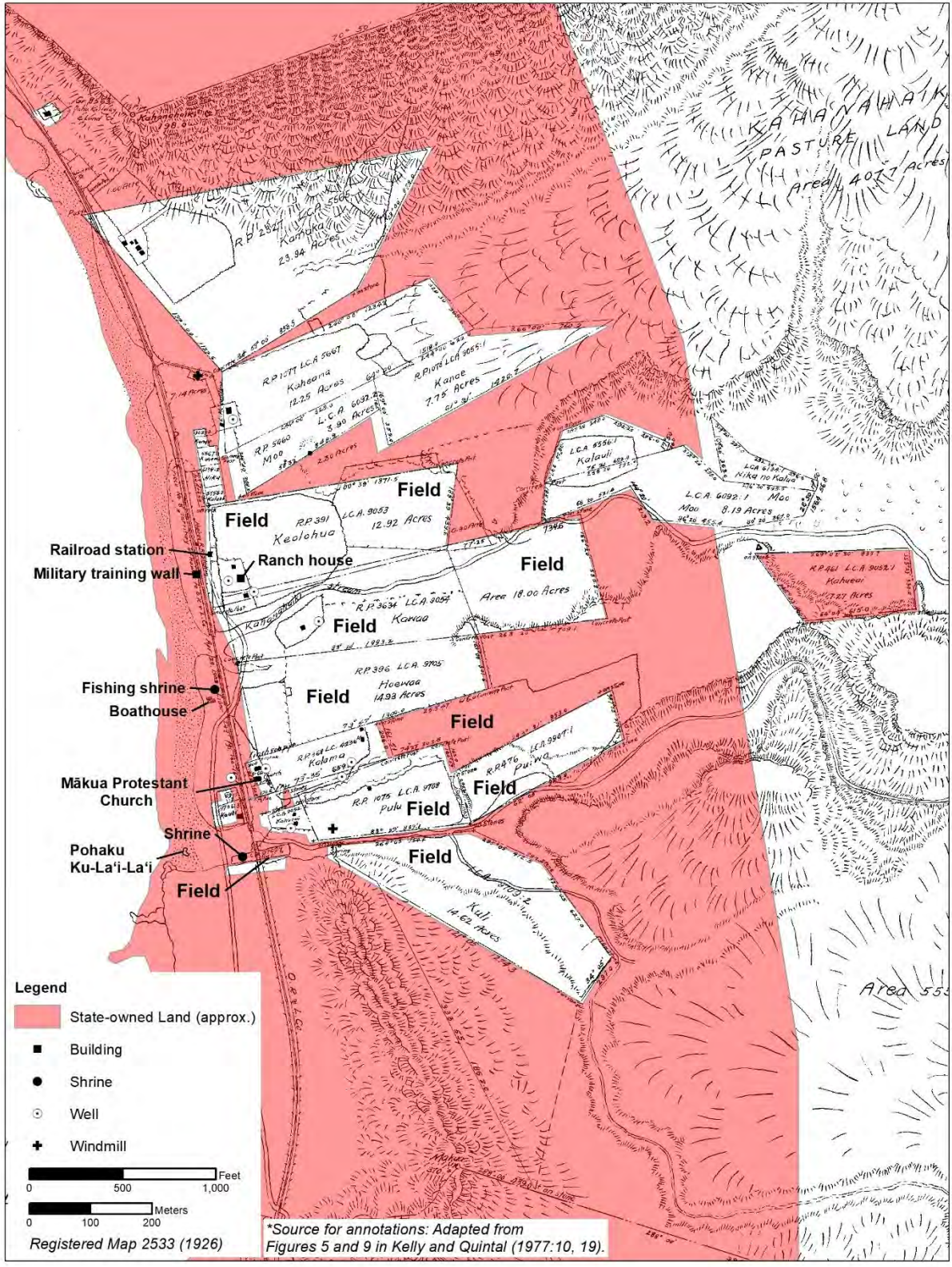
During the Kelly and Quintal (1977:9, 10) study, a 1926 Hawaiʻi Registered Map showing LCA data for Mākua and Kahanahāiki was annotated by Adrian Silva, a foreman of Mākua Ranch (Figure 33). Silva indicated the locations of wells, windmills, shrines, buildings, and other notable features of the landscape during his time in the valley prior to the ranch's closure in the early 1940s. Agricultural fields were also noted which were based on information provided during interviews conducted by Kelly and Quintal (1977:19) (see Figure 33).

### **Railroad Construction in Mākua Valley**

In 1888, Ben Dillingham began building a railroad along the coast in Waiʻanae, which was taken over by the Oahu Railway and Land Company (OR&L) in 1900 (Kelly and Quintal 1977:61). By 1903, the railroad right-of-way was surveyed through Mākua Valley, but it was a few more years before the railroad extended around Kaʻena Point and on to Kahuku (Kelly and Quintal 1977:61). The train station was located near the Mākua Ranch (see Figure 33).

The Japanese who lived in Mākua Valley in the 1900s were often railroad workers who built and maintained the tracks and cleared the large rocks that had fallen from Keawaʻula cliffs onto the tracks (Kelly and Quintal 1977:66); they lived in Railroad Section Camp No. 6, worked six days a week, and earned \$26 a month in the 1930s (Ushijima 1996:20). Many of the railroad workers grew vegetables or raised pigs and chickens to feed their families or to sell for extra money (Kelly and Quintal 1977:68–69). The railroad that ran through Mākua and the project area brought surplus vegetables, fish, and livestock from Mākua Ranch to markets in ʻEwa, Honolulu, and Waiʻanae, and slaughterhouses in urban centers (Kelly and Quintal 1977:59). The railroad and a railroad station are visible on a 1913 Army Kaena quadrangle map, along with agricultural fields, windmills, rock walls, and an unimproved road along the coast (see Figure 31).

Prior to 1936, there was a dirt road between Mākua and Waiʻanae. In 1936, the road was realigned and paved by the Territory of Hawaiʻi, and bridges were installed over the streams. According to Ushijima (1996:99), the hill in front of Kāneana Cave was cut by over 30 feet to level the road, and these cut marks were still visible in 1996 at the entrance to the cave.



**Figure 33. Annotated 1926 Registered Map 2533 showing kuleana lands and activities within and adjacent to the State-owned land at MMR (annotations adapted from Figures 5 and 9 in Kelly and Quintal 1977:10, 19).**

#### **6.1.3.4 Military History**

The Army took over Mākua Valley, including the MMR project area, in 1942 and Mākua Ranch ceased operations. McCandless' leases on the land were suspended and cancelled, and the people living on McCandless' leased land were relocated. Ushijima (1996:100) describes what happened to the once thriving community:

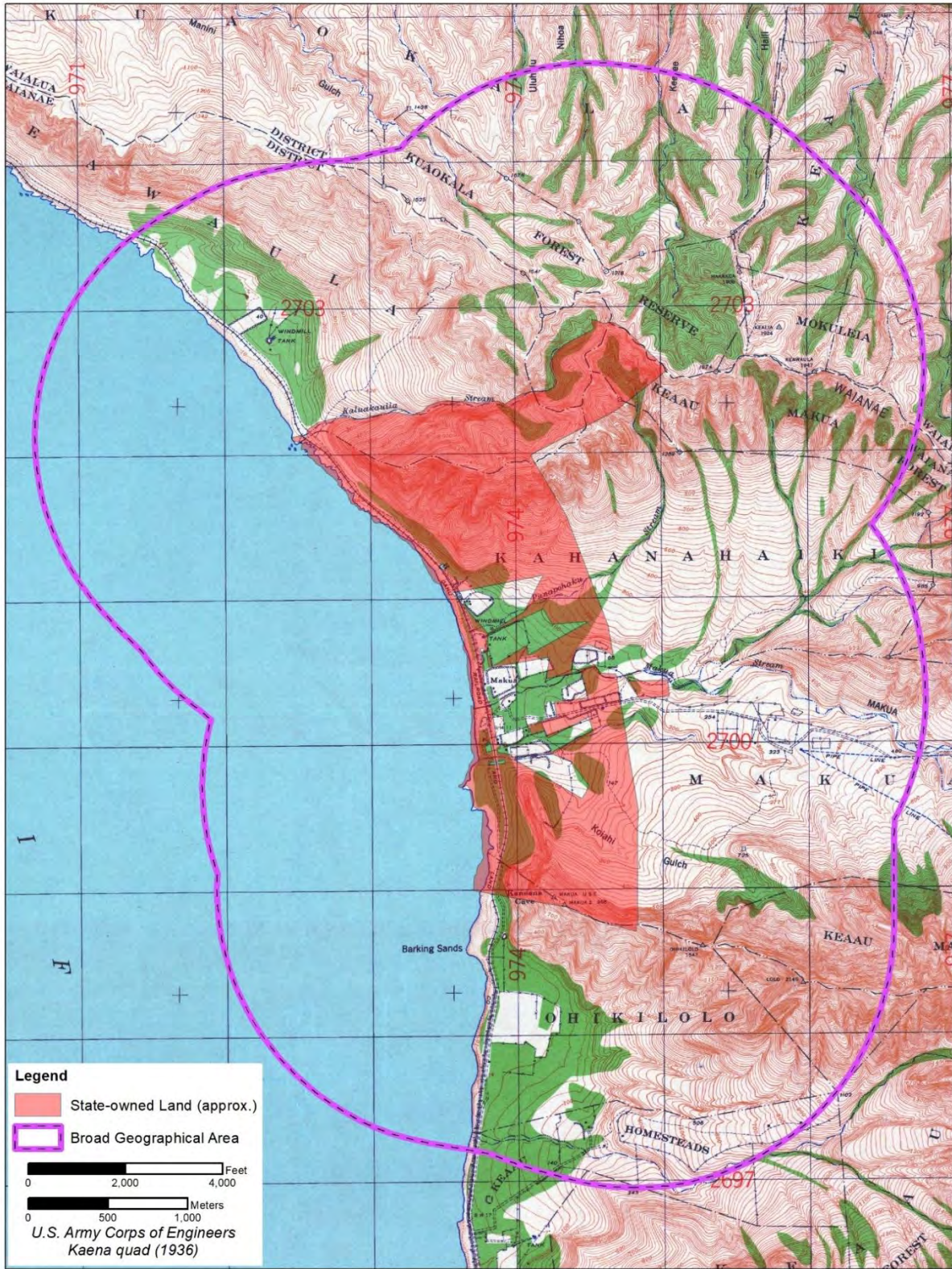
. . . the railroad workers were relocated to the Waianae Section Camp at Pokai Bay in "kamaboko houses" (10' x 30' Quonset huts made of steel ribs and metal partitions); the Naiwis, Sam Puluole and Kala, and Agatha Naiwi Solomon were relocated into Quonset huts on the beach at Ohikilolo; and the Maeda family to a hastily built cottage in the kiawe bushes right below the Kaneana Cave in Ohikilolo. Thereafter, thousands of troops made amphibious landings along the beaches and assaulted the "enemies" inland . . . The only thing remaining is the Cemetery in the Makua Protestant Church property . . .

Land-use changes from the transition to a military presence in the MMR project area are illustrated by a comparison of the 1936 USACE and 1954 USGS Kaena quadrangle maps (Figure 34 and Figure 35). In 1936, the OR&L railroad, rock walls, fencelines, buildings, water tanks, a windmill, and other landscape features, within the MMR project area and the broad geographical area, are indicative of an agricultural and traditional subsistence community (see Figure 34). In contrast, by 1954, military reservations have taken the place of the residential and agricultural features, except for the cemetery (see Figure 35). The railroad is also no longer illustrated, as the tracks were damaged during the tsunami of April 1, 1946, and never rebuilt (Kelly and Quintal 1977:96). An improved "medium-duty" road running along the coast halfway through the Mākua Ahupua'a is now present on the 1954 USGS map along with new unimproved roads into Mākua Valley. The State-owned land at MMR is currently used by the military under a 65-year lease (State General Lease No. S-3848), which was executed on August 17, 1964 (DLNR 1964c).

#### **6.1.4 Previous Ethnographic Interviews**

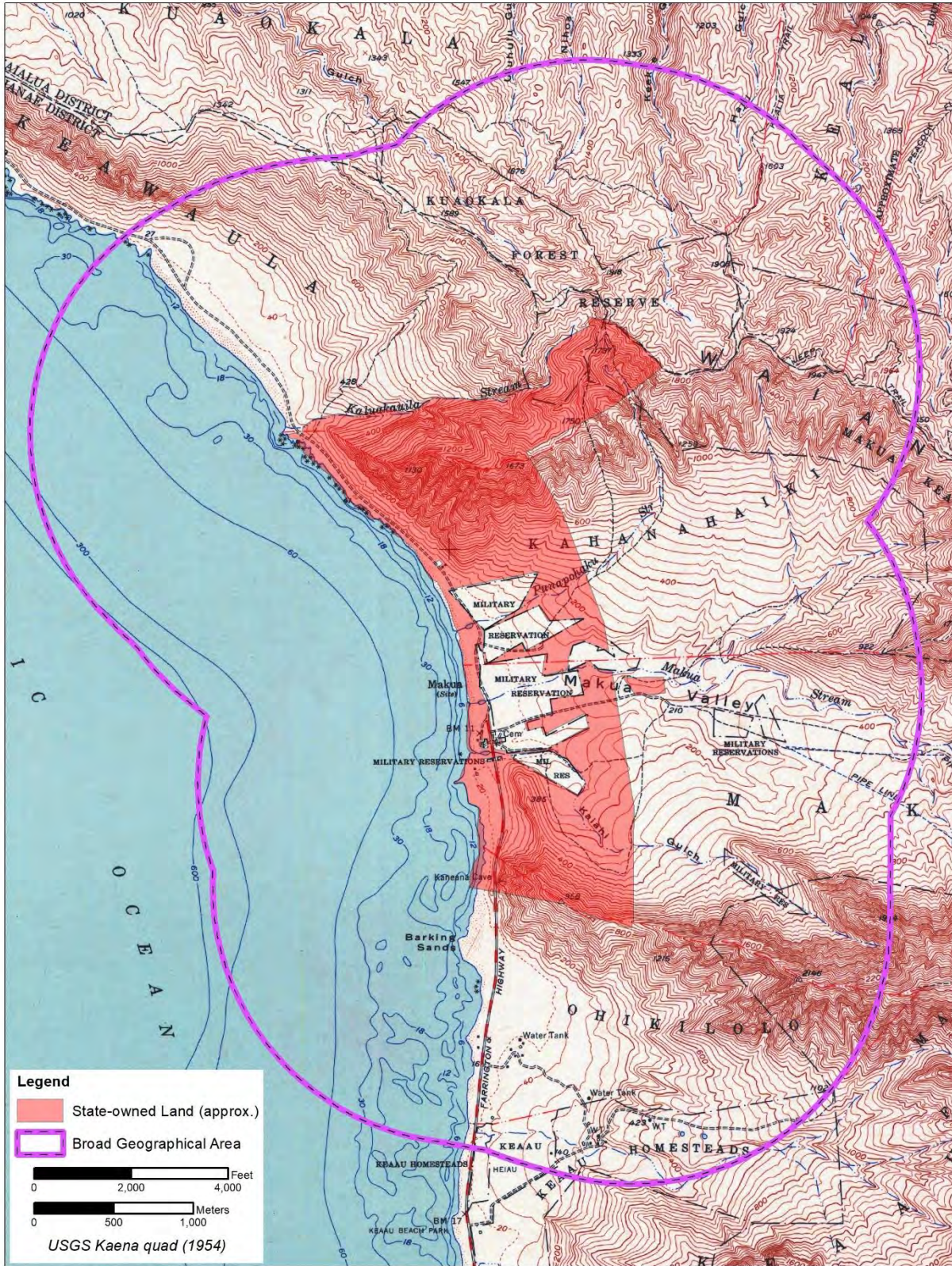
Four previous ethnographic studies have been completed that provide contextual information for the MMR project area: Kelly and Quintal (1977), Ushijima (1996), Maly and Wilcox (1998), and Gollin et al. (2013).

In 1977, the Anthropology Department at Bishop Museum prepared a comprehensive study on the cultural history of Mākua Valley at the request of the USACE (Kelly and Quintal 1977). The study conducted archival research for an extensive historical background and collected oral histories from twenty-two people through fifteen interviews.



**Figure 34. 1936 USACE Kaena quad showing OR&L railroad, rock walls, fencelines, a windmill, water tanks, and other landscape features within the State-owned land at MMR and the broad geographical area.**





**Figure 35. 1954 USGS Kaena quad showing new military reservations where residential and agricultural features were once present on 1936 USACE map.**

Informants in the Kelly and Quintal (1977) study identified the following practices within the Mākua area:

- Agriculture: ‘Uala, cucumber, watermelon, cotton, corn, pumpkins, and tobacco.
- Ranching: Roping wild cattle, raising cattle and chickens, riding horses, and pumping water for cattle.
- Fishing: ‘Opelu (mackerel scad, *Decapterus macarellus*), moi (Pacific threadfin, *Polydactylus sexfilis*), āholehole, manini (convict tang, *Acanthurus triostegus*), rock cod (*Sebastes alutus*), ‘ōpae (red shrimp, *Halocaridina rubra*), mullet (*Mugil cephalus*), ‘alamihi, ‘o‘opu, ‘ō‘io (Hawaiian bonefish, *Albula virgata*), goldfish (*Carassius auratus*), .akule, uhu (parrotfish, *Scarus perspicillatus*), kūmū (goatfish, *Parupeneus porphyreus*) and ‘oama (goatfish, Mullidae), nenuē (Hawaiian chub, *Kyphosus hawaiiensis*), ‘aweoweo (Hawaiian bigeye, *Priacanthus meeki*), pipipi (bivalve mollusc, Bivalvia), kūpe‘e (edible marine shell, *Nerita polita*).
- Pa‘akai (Hawaiian sea salt) gathering.

An informant mentioned the presence of pheasants, peacocks, Hawaiian doves, wild dogs, and mongoose in the area (Kelly and Quintal 1977:Appendix A, Interview No. 1, p8). A former cowboy recalled the presence of lantana (Verbenaceae), “clew,” panini (peony), and cactus; according to the informant, clew is “that sticky stuff you put under your feet. . . The kind they used to bite, you rub on your tongue. . . For eat or something. Good medicine” (Kelly and Quintal 1977:Appendix A, Interview No. 1, p6). Additionally, another informant’s grandfather had an encounter with the fish goddess Hina near Mākua Cave, who told him the land will never be without fish (Kelly and Quintal 1977:Appendix A, Interview No. 4 [Part 1], p3).

The study also recorded additional information about Ko‘iahi (Kaiahi). Ko‘iahi, where kukui nut trees (candlenut tree, *Aleurites moluccana*) and the maile lau li‘i grow, is said to have had a cave that connected with Kāneana Cave; it has since been closed (Kelly and Quintal 1977:Appendix A, Interview No. 2, pp4–5). A Japanese farmer grew papayas and pumpkins in Ko‘iahi; coffee, kō, kalo, oranges, and lemons were also grown there (Kelly and Quintal 1977:Appendix A, Interview No. 14, pp4,14). An informant shared they did not see sandalwood in Ko‘iahi but believed they may have been grown a long time ago; after heavy rainstorms, the informant could sometimes see pieces of sandalwood on the beach (Kelly and Quintal 1977:Appendix A, Interview No. 14, p14). One informant shared the following mo‘olelo legend associated with Ko‘iahi, “In that stream [Ko‘iahi] is the lizard, the one that meets the shark god. She flies down when it rains, “Mo‘o Ko‘iahi.”” (Kelly and Quintal 1977: Appendix A, Interview No. 4 [Part 2], p1).

The study also noted the practice of gathering pa‘akai at Kalaepa‘akai in ‘Ōhikilolo, south of the project area (Kelly and Quintal 1977: Appendix A, Interview No. 2, p2). Another informant told of gathering pa‘akai on the reef which was accessed via a small entrance “just before” Kāneana Cave, possibly within the

project area (Kelly and Quintal 1977: Appendix A, Interview No. 4 [Part 1], p3). The salt was gathered in many ways, including in salt pans or by gathering it from the shoreline.

At the time of Kelly and Quintal’s study, the gathering of pa’akai had ceased (Kelly and Quintal 1977:4):

Sea salt, once an important coastal resource, is neither made nor gathered from the coral-shelf areas any longer, mainly, informants say, because of pollution from soil erosion, and garbage and trash left by careless shoreline-users who no longer respect the area as a source of that important food.

Tetsuro Ushijima grew up in Mākua Valley during the late 1920s and 1930s and wrote a booklet about his time there, which includes interviews with residents of the valley and hand-drawn maps showing the locations of important houses, fields, and other landmarks, some of which are located within the MMR project area (Figure 36). During Ushijima’s time in Mākua, Japanese, Hawaiian, and Filipino families were living in Mākua and nearby areas, many within the Section Camp No. 6 and La’ihau, a group of homes located about a half mile south of the railroad camp and likely just outside the State-owned land at MMR (see Figure 36). In the 1930s, there was still no electricity and only one phone in the valley; water was drawn from a 20-foot deep well and most of the food consumed by the residents was grown on the land, including “mangoes, guava, berries, figs, or local oranges” (Ushijima 1996:81). Salt was collected from the rocks in front of Kāneana Cave, which was “famous for its salt from ancient Hawaiian times” (Ushijima 1996:82). On New Year’s Eve, the Japanese in Mākua would get together and pound mochi for the New Year’s celebration the next day (Ushijima 1996:84). Ushijima (1996:70) also describes the marine resources near Mākua Beach:

. . . at one time had lots of fish, lobster, crab and limu along the rocks at both ends of the beach and in between. During the seasons, there were thousands of moilii [moi], papio [white ulua, *Caranx ignobilis*] and akule. There used to be several moi holes at both ends of the beach, but my favorite was the one about 500 yards Kaena of the Kaneana Cave. There were three holes along the rocky ledge that opened to a cave below. . .

Maly and Wilcox (1998) prepared an ethnographic study as part of a larger Environmental Assessment (EA) to assess the cultural significance of Mākua Beach and potential impacts of Marine Corps amphibious training on cultural resources and the affected community. Their project area is situated at the makai end of the current MMR project area. The authors conducted archival research and seven oral history interviews with individuals with genealogical ties to the project area or firsthand knowledge or experience with the community and cultural significance of the area. The following specific cultural practices were noted by interviewees as occurring within the project area:

- Past and present gathering and subsistence practices, such as fishing that occurred not only at the beach but along streams.

- Ceremonial practices associated with the god, Kanaloa, and with Hawaiian ancestral burials and mortuary rituals, such as scattering ashes of notable Native Hawaiians.

Cultural resources located in the project area include the community's church, canoe house, ko'a, kuahu (altar), and the beach and nearby coastal waters (Maly and Wilcox 1998:R-18,R-20).

Informants also shared the profound connection between the Mākua community and the natural resources of the land and waters of Mākua, but that this was "largely broken with the advent of the WWII, the removal of the people, the destruction of physical structures such as homes and the church, and the denial of access" (Maly and Wilcox 1998:R-18).

Gollin et al. (2013) prepared a Traditional Cultural Places (TCP)/Ethnographic Report for the MMR. The authors conducted a review of existing background literature, interviews with knowledgeable cultural informants, identification and interpretation of cultural resources and associated boundaries, and recommendations for TCP determinations within the MMR. The authors targeted three informant categories: lineal and cultural descendants from Mākua, cultural descendants from the broader Wai'anae Coast with a family history of seasonal/occasional use of Mākua, and the broader community of Hawai'i who use resources in Mākua or who have developed a personal connection with the land.

The authors interviewed over twenty individual informants and community groups, which yielded myriad cultural resources, practices, and beliefs associated with the project area (see Gollin et al. 2013:53–78 for in-depth results of the interviews). The results of the study yielded four major themes from archival and informant data, including the community's genealogical connections to Mākua, sacred and ritual connections with Mākua Valley, place-based connections, and the interconnectedness of natural and cultural resources (Gollin et al. 2013:78–117). A response from one of the study's informants evidences the deep genealogical and place-based connections that characterize Native Hawaiian associations with the land:

Makua being the land of creation of our kupuka'āina people. Kupu means the fern. We are called "fern people" because we came before the taro people. The kalo [taro]—Haloanaka [the stillborn child of Wākea (the sky father) and his daughter Ho'ohokukalani (daughter of Pāpā, the earth mother), buried near the house and grew into a taro plant, considered the elder sibling of the Hawaiian people] . . . We're the kupu. Because if you go to the volcanoes . . . it's the kupu that sprouts from the land. You don't have to bring the taro from Tahiti or anywhere else. Uncle Jay Landis, Uncle Albert Silva's cousin, hanai brother, he was the one who taught us about the term and corrected us not to change the name because we tried to use a more modern term, which is "kupaka'āina" which means, "keeper of the land." He corrected us and said, "No, we're not kupa, which means the caretakers of the land. We're kupuka'āina." He said, "We're the lineal descendants." [Gollin et al. 2013:79]

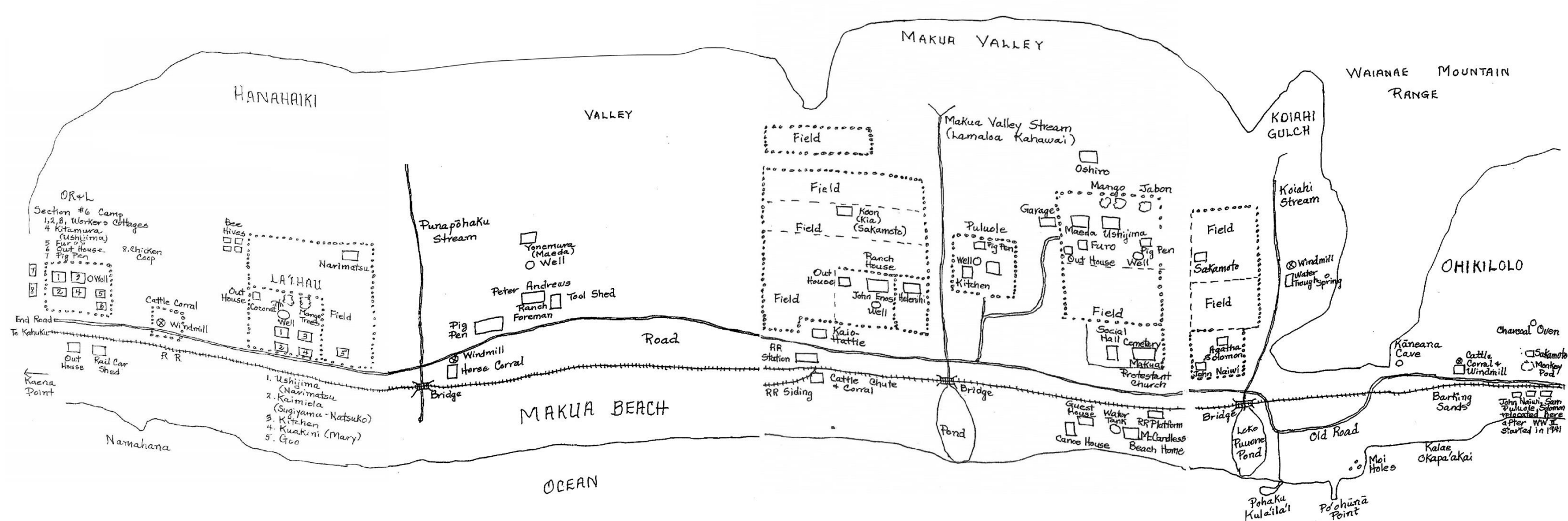


Figure 36. Hand-drawn maps (not to scale) by Tetsuro Ushijima showing homes, fields, and other landmarks within Mākua and Kahanahāiki, including the MMR project area, during the early twentieth century up to 1941 (adapted from Ushijima 1996:64-67). Note, north is toward the left.

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This statement conveys the deep cultural and ancestral affiliation with the land and resources in Mākua. The oral history of “fern people before taro people” is not only enriched with lineal ties to ancestors of Mākua but is also epistemologically indicative of Native Hawaiians’ scientific based principles to horticulture and the environment.

## 6.2 ONLINE SURVEY AND INTERVIEWS

Individuals and organizations with potential expertise and knowledge of cultural resources, practices, and beliefs relevant to the project area were given an opportunity to participate in an online survey as well as one-on-one interviews. The following sections summarize the responses received during this outreach process.

### 6.2.1 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. Appendix B presents full questions and responses to this survey. The survey for the MMR project area received a total of seven respondents (note, however, that some questions were skipped and did not receive responses from all seven respondents). These respondents expressed knowledge of cultural resources, practices, and beliefs within the area and noted the following as being pertinent to the project area: the practice of sharing mo’olelo, inoa ‘āina, traditional agriculture, traditional gathering, and ceremonial practices. Survey respondents also shared several Native Hawaiian beliefs associated with the project area. These are summarized below.

*Mo’olelo* associated with the MMR project area and mentioned by survey respondents include the mo’olelo of Papa and Wākea. One respondent related the story that Kamehameha called Mākua “barking sands” because of the sound the waves make upon hitting the beach.<sup>5</sup> There were also numerous inoa ‘āina mentioned by survey respondents for the MMR project area and the broad geographical area.

*Traditional agricultural practices* were mentioned by survey respondents as practices that used to occur in Mākua Valley. One survey respondent wished such activities could continue within the valley.

*Traditional gathering* for native plants for lā’au lapa’au was mentioned by survey respondents. Another respondent commented on the nearby beach being used for subsistence fishing, and that the fish, octopus, and crustaceans are hunted to make Traditional Hawaiian dishes.

*Ceremonial practices* were also alluded to through the mention of heiau and burials located within the MMR project area.

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<sup>5</sup> Other Native Hawaiians have asserted different mo’olelo for this place.

Lastly, one informant shared the Native Hawaiian belief that Mākua is the birthplace of man as well as the place where souls depart for the afterlife. Another survey respondent shared the belief that Mākua is a healing place.

## 6.2.2 Interview Responses

One-on-one interviews were conducted with ten individuals associated with the MMR project area (Table 5). 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 D. The current section lists the cultural resources, practices, and beliefs each interviewee mentioned that pertained to the State-owned land at MMR and the broad geographical area. For a list of effects to cultural resources, practices, and beliefs from continued military activity in the MMR project area as identified by interviewees, see Section 6.4. For a list of the interviewees’ mitigation recommendations for the MMR project area, see Section 9.2.3. Biographical information for each interviewee is provided in Section 2.2.2.1.

**Table 5. Individuals Interviewed for MMR Project Area**

INTERVIEWEE	INTERVIEW TYPE
Mr. William J. Ailā	Telephone
Mr. Peter Apo	Telephone
Mr. (Norman) Mana Kaleilani Cáceres	Telephone
Mr. Eric Enos	Telephone
Mr. (Nathan) Keola Grace	Telephone
Mr. Neil J.K. Hannahs	In person
Mr. Allen Hoe	Telephone
Mr. Kyle Kajihiro	Telephone
Mr. Thomas Lenchanko	Telephone
Mr. Christophor Edward Oliveira	Telephone

### 6.2.2.1 Mr. William J. Ailā

The interview with Mr. William J. Ailā was conducted by Mr. Sproat from Honua Consulting, LLC on July 6, 2022. Mr. Ailā shared the following information on cultural resources, practices, and beliefs:



## Cultural Resources

- Mr. Ailā said “one important resource is a spring, which has been covered up by military infrastructure but then found again after a fire”; however, he did not provide a specific location for this spring.
- Mr. Ailā noted Mākua Stream as a perennial water resource. Mr. Ailā recounted a story of “catching ‘o‘opu in the stream” in the 1970s, but “he hasn’t seen any since.”
- Mr. Ailā noted the rich ocean waters of Mākua contain “many schools of fish and even pelagic fish that helped feed the inhabitants of Mākua.” He mentioned “there is also limu along certain parts of the shoreline.”
- Mr. Ailā mentioned the presence of native plants in the back of Mākua Valley, including maile, ‘ōhi‘a ‘ai, kauila, and native ferns; however, the authors remind the reader that the back of Mākua Valley is outside of the current study’s broad geographical area for the MMR project area. He also “mentioned there are orange trees from the original kuleana lands and many more critically endangered native plants in the area, as well as a snail enclosure.” However, he did not provide specific locations for these resources.
- Mr. Ailā explained “that there are pueo in the area,” but he did not indicate whether the pueo were within the State-owned land at MMR.
- Mr. Ailā noted that “there are at least three heiau in the lower portion of the valley” and “this area is associated with the mo‘o, La‘ila‘i.”

## Cultural Practices and Beliefs

- Mr. Ailā noted that “they have been doing Makahiki ceremonies since 2001 in each ahupua‘a in the area.” He further stated, “the purpose of these ceremonies is to restore positive mana and energy across the ahupua‘a.”
- Mr. Ailā stated there are “stories of family ‘aumakua in the form of a shark along the shoreline.”
- Mr. Ailā mentioned the “gathering maile and other plants also occurs in the valley today.” and “that pig hunting remains a very common cultural practice in the area.”
- In the mauka areas, “people buried their babies’ placentas”; however, the authors remind the reader that the mauka areas are outside of the current study’s broad geographical area for the MMR project area.
- Mr. Ailā noted that “his uncle’s father was the pastor, and he went inland to collect thatching material and wood to construct the church.” However, he did not provide a specific location for this collection area.

### 6.2.2.2 Mr. Peter Apo

The interview with Mr. Apo was conducted by Mr. Sproat from Honua Consulting, LLC on June 15, 2022. Mr. Apo shared the following information on cultural resources, practices, and beliefs:

### **Cultural Resources**

- Mr. Apo did not recall specific resources in Mākua Valley, but he “acknowledged that there were multiple sites that have to do with ‘wahi pana’ (‘sacred lands’), customs and traditions that had to do with how the land was treated, and in the ahupua‘a system how the land was assigned.”

### **Cultural Practices and Beliefs**

- Mr. Apo shared “no knowledge of any cultural practices and beliefs associated with the State-owned land at MMR or the broad geographical area.”

#### **6.2.2.3 Mr. (Norman) Mana Kaleilani Cáceres**

The interview with Mr. Cáceres was conducted by Mr. Sproat from Honua Consulting, LLC on June 13, 2022. Mr. Cáceres shared the following information on cultural resources, practices, and beliefs:

### **Cultural Resources**

- Mr. Cáceres discussed how Mākua Valley “as a whole is a unique and significant cultural resource.”
- Mr. Cáceres shared that “during his time in the valley as a cultural monitor, he learned that Mākua Valley contains many cultural resources including natural springs, ki‘i (petroglyphs), ahu (shrines), native plants including maile, as well as significant cultural sites.” However, he did not provide specific locations for these resources.
- Mr. Cáceres listed freshwater sources, ki‘i, and other cultural structures like ahu as “resources connected to cultural practices.”
- Mr. Cáceres named “maile as a significant resource” in Mākua Valley.

### **Cultural Practices and Beliefs**

- Mr. Cáceres mentioned lei making with maile collected in Mākua Valley.
- Mr. Cáceres “knows of hunters who access the lands around Mākua to hunt.”
- Mr. Cáceres stated “one tradition connected to the area is gathering medicinal plants.”

#### **6.2.2.4 Mr. Eric Enos**

The interview with Mr. Eric Enos was conducted by Mr. Sproat from Honua Consulting, LLC on June 12, 2022. Mr. Enos shared the following information on cultural resources, practices, and beliefs:

### **Cultural Resources**

- Mr. Enos shared “there are many cultural sites as well as native species” within Mākua Valley; however, he did not provide specific locations for these resources.
- Mr. Enos stated Mākua Valley “is part of this valuable watershed” and water is a “significant cultural resource in Mākua” that needs protecting “in addition to

the actual valley.” Mr. Enos further stated, “Mākua Valley houses different springs and water sources.”

- Mr. Enos mentioned “ocean resources, including limu and fish, are culturally significant in this area.”

### **Cultural Practices and Beliefs**

- Mr. Enos said that Makahiki ceremonies have been held “in Mākua Valley for the past 18 or so years.”
- Mr. Enos mentioned how “Ka’ala Farm works to uphold cultural practices in the area including kalo farming.” Kalo farming and other cultural practices rely on “the watersheds that start in the mountains in the back of the valley and feed into the larger system.” However, Mr. Enos did not provide specific locations for these practices.
- Mr. Enos shared significant place names in the MMR project area and the broad geographical area, including Ko’iahi, Kahanahāiki, and Kuaokalā. “Ko’iahi and Kahanahāiki are the different parts of the valley, and Kuaokalā is the ridgeline of Ka’ala.”
- Mr. Enos discussed “how fishing in the waters outside of Mākua Valley” is a cultural practice with “families using this area for fishing for generations.” He described “these coastlines as an active recreation area where people practice fishing and other ocean resource practices.” He further stated that “the coast outside of Mākua is one of the best fishing sites in the moku (district),” and “Mākua Beach has a long coastline making it an ideal fishing site.”
- Mr. Enos explained that “Mākua was once a fishing village, and it is connected to the deep-sea fishery outside of Ka’ena.”
- Mr. Enos stated that at one time the coastlines in the area, including Mākua, were “known for being productive with ahi, opelu, akule, and larger migratory species.”
- Mr. Enos shared that “Mākua is connected to certain creation stories, like Kūla’ila’i,” and “some of the springs and water sources within Mākua are connected to Kūla’ila’i and these traditions.”

#### **6.2.2.5 Mr. (Nathan) Keola Grace**

The interview with Mr. Grace was conducted by Mr. Sproat from Honua Consulting, LLC on May 11, 2022.

Mr. Grace shared the following information on cultural resources, practices, and beliefs:

### **Cultural Resources**

- Mr. Grace mentioned “Mākua Cave as a significant cultural resource in Mākua.”

### **Cultural Practices and Beliefs**

- Mr. Grace discussed how surfing, farming, and ranching are cultural practices connected to Mākua. However, he did not provide specific locations for these practices.

#### **6.2.2.6 Mr. Neil J.K. Hannahs**

The interview with Mr. Hannahs was conducted by Mr. Sproat from Honua Consulting, LLC on June 20, 2022. Mr. Hannahs shared the following information on cultural resources, practices, and beliefs:

### **Cultural Resources**

- Mr. Hannahs stated that fish and limu were important cultural resources.
- Mr. Hannahs shared that he considers “rain and wind as cultural resources and that you are shaped by your environment.”

### **Cultural Practices and Beliefs**

- Mr. Hannahs expressed that “it is limiting to think of the MMR project area in terms of a single valley.” He further stated that “there are many valleys, and as a result you must view it in its entire context.”
- Mr. Hannahs talked about “a Native Hawaiian viewpoint which does not view the land as merely terrestrial, but also includes the ocean and the heavens.” He noted, “the symbiotic relationship between these realms.”

#### **6.2.2.7 Mr. Allen Hoe**

The interview with Mr. Hoe was conducted by Mr. Sproat from Honua Consulting, LLC on June 14, 2022. Mr. Hoe shared the following information on cultural resources, practices, and beliefs:

### **Cultural Resources**

- Mr. Hoe mentioned Mākua Cave is “considered an important cultural resource.”

### **Cultural Practices and Beliefs**

- Mr. Hoe shared that he “does not have any familial or personal knowledge regarding the cultural practices and beliefs associated with Mākua Valley.”

#### **6.2.2.8 Mr. Kyle Kajihiro**

The interview with Mr. Kajihiro was conducted by Mr. Sproat from Honua Consulting, LLC on June 15, 2022. Mr. Kajihiro also submitted a response via email attachment on behalf of Hawai‘i Peace and Justice (of which he is a Board member) and Koa Futures. A summary of the cultural resources, practices, and beliefs within this letter is provided in Section 4.2.2.6 and the full letter is provided in the scoping comments in Appendix E of the O‘ahu ATR EIS. Mr. Kajihiro shared the following information on cultural resources, practices, and beliefs:

## Cultural Resources

- Mr. Kajihiro listed these cultural resources: “Ukanipō Heiau, which is on the Ka’ena side of Mākua; Kumuakuopio Heiau on the eastern side of the valley; a site that may have been heavily disturbed near the center part of Mākua that Mr. Kajihiro could not recall the name of; Kāneana Cave, which went all the way down to the sea prior to the road cut along with many stories relating to Maui Hina and a shark deity that are associated with that sea cave; Mailelauli’i, which was very well known and documented in stories from Ko’iahi Gulch; and a punawai (natural fresh water spring) documented by Marion Kelly in her 1977 report [Kelly and Quintal 1977] and rediscovered by kupuna Walter Kamana on a cultural access tour.”
- Mr. Kajihiro stated that “there are also ko’a along the shoreline but is unaware of their exact location.”
- Mr. Kajihiro mentioned three modern ahu inside the MMR boundary and within the broad geographical area of the State-owned land at MMR; however, due to their contemporary age, these ahu are not included in the discussion of cultural resources for the current study.

## Cultural Practices and Beliefs

- Mr. Kajihiro recalled that “Mākua Valley was known historically as an important fishing site” with “a very robust fishing area.”
- Mr. Kajihiro stated that he spoke “to kūpuna who have lineal ties to Mākua Valley and who speak of family burials within the valley.” However, he did not provide specific locations for these burials.
- Mr. Kajihiro shared mo’olelo of the shark god [Nanaue] who resided in Kāneana Cave, within the MMR project area. Mr. Kajihiro recounted that “when there were rains and the sea was rough, the shark god would come down from the cave into the ocean and rendezvous with a mo’owahine from Ko’iahi. When the heavy rains filled the muliwai, it would turn the river water green and enter the ocean near a stone called Kūla’ila’i. The entrance of the river water into the ocean would cause rough, turbulent seas that were believed to be the result of their romantic rendezvous and lovemaking.”
- Another mo’olelo shared by Mr. Kajihiro was from a collection of mo’olelo collected by Kepā Maly of Hi’iaka and Lohi’au traveling from Kaua’i and landing at Mākua. “Hi’iaka would chant a greeting to many of the landscape features in the area including pōhaku features. These features were personified by Hi’iaka as akua or family members as she chanted to these features. At a swimming area known as Kilauea located between Keawa’ula and Mākua, a young woman from Mākua dove into the ocean and struck the rock that mysteriously appeared and killed her. When Hi’iaka saw this woman, she resuscitated this woman on the shores of Mākua Beach with a chant to Kanaloa and Kāne to bring life back to the woman. Hi’iaka told the parents of this woman that the plants or lā’au lapa’au in Mākua Valley could be used medicinally to heal the woman. The stone which initially killed the woman was a kupua [demigod] that had become evil; its name was Pōhakuloa. Pōhakuloa

was jealous of the girl because she had rejected his romantic affections. Knowing that Pōhakuloa could continue to harm the people and area of Mākua, Hi'iaka entered the ocean to battle this kupua. Pōhakuloa turned himself into the form of a shark. During the battle, a waterspout shot out of the water over Kuaokalā, indicating that Hi'iaka successfully defeated Pōhakuloa. The grateful community of Mākua celebrated Hi'iaka's success with a huge feast." Mr. Kajihiro asserted that this story "suggests the abundance of resources in Mākua at that time with ample food and labor."

- Mr. Kajihiro noted that "Mākua was known as a place of healing with the abundance of lā'au lapa'au in the valley."

#### **6.2.2.9 Mr. Thomas Lenchanko**

The interview with Mr. Lenchanko was conducted by Mr. Sproat and Dr. Watson-Sproat from Honua Consulting, LLC on May 10, 2022. Mr. Lenchanko shared the following information on cultural resources, practices, and beliefs:

##### **Cultural Resources**

- Mr. Lenchanko stated Mākua Valley is "a significant cultural property and part of the ka'ānani'au system."
- Mr. Lenchanko discussed how "there are several heiau in Mākua Valley and that the valley carries significant places like Ko'iahi where the famous maile lau li'i once grew." However, he stated that he "is unsure of what cultural resources remain in Mākua."

##### **Cultural Practices and Beliefs**

- Mr. Lenchanko shared that he was taught Mākua is the "vein of creation." He discussed how "it is a place that connects us back to our origins" and how this "connection to invisible land" is "in reference to Hawaiians maintaining a connection to their ancestral lands."

#### **6.2.2.10 Mr. Christophor Edward Oliveira**

The interview with Mr. Oliveira was conducted by Mr. Sproat from Honua Consulting, LLC on June 5, 2022. Mr. Oliveira shared the following information on cultural resources, practices, and beliefs:

##### **Cultural Resources**

- Mr. Oliveira shared that "the entire valley is a cultural resource including intangible resources like sunrise and sunset times, observation of seasonal changes, and the entire cultural landscape."
- Mr. Oliveira mentioned that there are burials "near the graveyard and the church." He also named "Kuihelani, Kalaeopa'akai, and Po'ohuna as burial grounds and sites connected to iwi kūpuna." These locations are within the broad geographical area of the MMR project area.

- Mr. Oliveira stated that “maile lau li’i and loulou (fan palm, *Pritchardia* spp.) are significant plants connected to Mākua Valley,” and “these resources are famed in chants and traditions connected to Mākua.”

### **Cultural Practices and Beliefs**

- Mr. Oliveira shared that the three valleys, Kahanahāiki, Ko’iahi, and Mākua, were called “Nā Mākua” collectively. Mr. Oliveira further stated that “the area from Mākaha to Ka’ena was known as Kānehunamoku.”
- Mr. Oliveira mentioned that “La’ihau, Kanipō, Kumuakuopio are all names of temples in the area.”
- Mr. Oliveira explained that “his kūpuna emphasized the importance of place names and going to those places to learn about them and their traditions.”
- Mr. Oliveira referenced “Mākua Valley’s cultural significance in chants like Kūnihi Ka’ena and Kahuli Ka’ena, uttered by Wahine’ōma’oma’o. Three valleys are named in these chants: Nā ‘Ōhikilolo, Nā Mākua, and Nā Kea’au.” Mr. Oliveira further stated that “in a tradition of Hi’iakaikapoliopole, these three valleys were princesses who slept with Lohi’au and became known for their fragrant flowers.”
- Mr. Oliveira mentioned that “Ko’iahi is known for its maile lau li’i and Kea’au for its hala.”
- Mr. Oliveira named some mo’olelo connected to Mākua, including “the stories of Hi’iaka and Lohi’au, Ko’iahi, and Nanaue.” He explained, “how Mākua embodies these mo’olelo and chants, revealing them in its mountains and landscapes.”
- Mr. Oliveira shared that “Mākua was a place of origin for ali’i,” and the “ali’i were sent from Mākua to rule different places throughout the islands.” He stated that “these traditions come from the Nāmū genealogy.”
- Mr. Oliveira mentioned “how place names throughout the islands are inspired by place names from Wai’anae and Mākua.”

## **6.3 IDENTIFIED CULTURAL RESOURCES, PRACTICES, AND BELIEFS**

This section provides a summary overview of cultural resources, practices, and beliefs identified for the MMR project area and the broad geographical area based on the results of archival research and consultation and interviews.

### **6.3.1 Summary of Data Obtained from Archival Research**

The State-owned land at MMR and the broad geographical area have a rich archival history of cultural resources, practices, and beliefs. A few of the mo’olelo that exist are for Mākua Valley as the meeting place of Papa and Wākea, Mākua Beach as a place where Hi’iaka landed a canoe and partook of a welcoming feast, and Kāneana Cave, located within the MMR project area, as the dwelling place of shark

deities and a place of offering for 'aumākua. Inoa 'āina are also known for the broad geographical area, including for streams and unique landforms.

Archaeological sites within the MMR project area speak to the range and extent of traditional practices that occurred within the State-owned land at MMR, such as noho, uhaū humu pōhaku, traditional agriculture ('uāla farming), and ceremonial practices, including those associated with the Ukanipō Heiau (Site 0181).

Other traditional practices recorded within the broad geographical area include travel via overland trails as well as canoe; fishing within the ocean and the valley streams for aku, 'ahi, āholehole, 'o'opu, 'ōpae, and black 'alamihi crabs; and traditional resource gathering, including for lā'au lapa'au and collection of pa'akai. Many of these were also practiced into the Historic Period.

Subsistence farming and gathering continued in the MMR project area into the twentieth century, along with the addition of ranching. Japanese railroad workers entered Mākua Valley in the early twentieth century and engaged in subsistence farming and traditional gathering practices, such as for salt. Hawaiian families continued to practice traditional customs and traditions in the MMR project area and the broad geographical area, including leaving offerings for their 'aumākua at Kāneana Cave, praying at heiau and other spiritual sites, constructing fishing shrines, and caring for iwi kūpuna. Many of these practices were halted when the Army took over and closed the Mākua Valley in the mid-twentieth century and relocated the traditional community.

### **6.3.2 Summary of Data Obtained from Survey and Interviews**

Data obtained from this project's initial community outreach and online survey yielded information about the sharing of mo'olelo, inoa 'āina, traditional agriculture, traditional gathering, and ceremonial practices as being significant to the project area. Survey respondents also shared several Native Hawaiian beliefs associated with the project area, such as Mākua Valley itself (including the project area) being a sacred space, a place of healing, the place where souls are believed to depart for the afterlife, and the place where man was first created.

Ten individuals were interviewed for information on cultural resources, practices, and beliefs occurring within or associated with the MMR project area and the broad geographical area. Interviewees corroborate and reinforce results obtained from archival research and survey responses that cultural practices and beliefs are known for the broad geographical area encompassing the MMR project area; however, it is unclear what of these cultural practices and beliefs are specific to the project area itself. Cultural practices mentioned by interviewees include mo'olelo; traditional agriculture; traditional resource gathering of native plants (e.g., loulu, maile lau li'i) for lā'au lapa'au and lei making, as well as



freshwater and ocean resources (fishing) for subsistence; ranching; hunting; and ceremonial practices associated with Makahiki, caring for iwi kūpuna and burial sites, and ceremonies associated with heiau. Interviewees also commented on the sacredness of Mākua Valley, including the project area, and the cultural significance of the ʻāina itself. Interviewees shared that many traditional practices were not intentionally discontinued after the closure of the valley for military activity and are hoped to continue in the future.

#### **6.4 EFFECTS TO CULTURAL RESOURCES, PRACTICES, AND BELIEFS**

This section summarizes effects to cultural resources, practices, and beliefs from continued military activity in the MMR 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 Section 8.3.

Mr. Ailā

- Impacts from lack of access, environmental contamination from munitions.

Mr. Apo

- Wide range of impacts, but did not elaborate further on the range of impacts.

Mr. Cáceres

- Impacts from lack of access and the inability to care for the land.

Mr. Enos

- Impacts from fires and burning, impacts to cultural resources and traditional practices (further detail not provided).

Mr. Grace

- Not aware of any impacts to cultural resources, practices, or beliefs.

Mr. Hannahs

- Impacts from lack of access, live-fire military training.

Mr. Hoe

- Not personally aware of potential impacts from the Proposed Action.

Mr. Kajihiro

- Impacts from lack of access, fires, erosion, and UXO.

Mr. Lenchanko

- Impacts from lack of access and physical impacts from military activities.

Mr. Oliveira

- Impacts from lack of access, inability to care for the land and iwi kūpuna.

Repeated impact concerns, as shared by the interviewees for the MMR project area, include five general categories: 1) impacts from lack of access (stated by seven of ten interviewees),<sup>6</sup> 2) impacts from continued military training/activity (stated by four of ten interviewees), 3) impacts from fires (stated by two of ten interviewees), 4) general environmental impacts that were not always expanded upon (stated by two of ten interviewees), and 5) impacts to cultural resources and practices that were not defined (two of ten interviewees). Two interviewees had no impact concerns to share for the MMR project area

See Section 8.3 for an analysis of these potential impacts.

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<sup>6</sup> One additional interviewee mentioned access (for a total of eight interviewees mentioning access) but did not mention a lack of access or indicate there were any issues with access.

## 7 ACCESS POLICIES

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The next chapter (8) analyzes the potential impact of the Proposed Action and its alternatives on cultural resources, practices, and beliefs relevant to each project area. Before the analysis commences in that chapter, however, a recurring theme mentioned by interviewees must first be explored: access.

Access and the concern with access to and within each project area were mentioned during four of eight interviews for KTA, four of seven interviews for Poamoho, and eight of ten interviews for MMR. The following sections provide a review of current Army and State access policies for each project area: KTA, Poamoho, and MMR. These access policies were researched by accessing publicly accessible websites and documents and consulting with USAG-HI and DOFAW staff.

### 7.1 KTA ACCESS

This section describes the Army and State policies for access to the KTA project area.

#### 7.1.1 Army Policies

The Army manages an access policy for NHOs and consulting parties for KTA per the 2018 *Programmatic Agreement Among 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 Training Areas and Ranges on the Island of O'ahu, Hawai'i* (PA). The 2018 PA considers access within the discussion of the resolution of adverse effects (USAG-HI 2018a:17), which states, "USAG-HI will consider requests from Consulting Parties and other NHOs to conduct visits or stewardship activities at historic properties and cultural sites outside of duded impact areas according to the following stipulations:

1. Entry into U.S. Army lands may be granted in accordance with AR [Army Regulation] 350-19 [The Army Sustainable Range Program] and contingent on safety concerns, military training requirements, and available Army support staff.
2. Entry into areas known, or suspected, to contain unexploded ordnance is prohibited.
3. Entry into non-duded or subsurface cleared impact areas will be coordinated with, and approved by, the RDH [Range Division Hawaii] Range Management Authority. Entry into other range and training lands not used as impact areas will be approved by the USAG-HI Garrison Commander in coordination with the RDH Range Management Authority. Entry into areas under USAG-HI control, but not designated as range and training land, will be approved by the USAG-HI Garrison Commander.

4. Requests from Consulting Parties and other NHOs<sup>7</sup> must be submitted by email or in writing to the CRM, who will coordinate with the RDH Range Management Authority and the USAG-HI Garrison Commander as appropriate. Requests must include contact information, the specific site or location proposed, the purpose of the request or a description of proposed activities, names of all attendees, and proposed date and time frame.
5. Requests must be submitted at least 14 calendar days in advance of the proposed date. Requests to conduct site visits or stewardship activities during normal business hours are more easily accommodated and more likely to be approved.
6. USAG-HI shall respond to the requestor in writing or by email with a decision on the request within seven (7) calendar days of receipt.”

In lieu of physical access to current impact areas and other inaccessible areas, USAG-HI, with assistance from U.S. Army Training Support Systems and RDH, is working to “develop and provide virtual visits of historic properties, potential historic properties, and other site or areas of cultural importance or concern within the duded impact area and other inaccessible areas utilizing photographs, videos, and virtual reality displays created through unmanned aerial vehicle (UAV) applications” (USAG-HI 2018a:18). For non-impact areas, entry is coordinated and approved by the USAG-HI Garrison Commander.

### **7.1.2 State Policies**

KTA Tract A-1 contains the Kahuku Motocross Park, also known as Waiale‘e Motorcycle Riding Area, which has been operated by Hawai‘i Motorsports Association (HMA) under a revocable permit with the Hawai‘i DLNR since 1972 (USACE 2017:8). According to the HMA website, Kahuku Motocross Park is open on Saturdays and Sundays from 0800 to 1800 and some federal holidays from 0800 to 1500 (HMA 2022). According to the DOFAW Kahuku Motocross Park trails description, activities within the park require an entry fee and include all-terrain vehicles (ATVs)/motorized vehicles, bicycles, and motorcycles (DOFAW 2022f). However, according to the HMA rules and regulations, “[f]our-wheeling, golf carts, go carts, pocket bikes, bicycles, pedal assist e-bikes (or vehicles of such nature) are prohibited in the park” (HMA 2022). There are no other formally established trails in KTA Tract A-1 outside of the motocross park.

KTA Tract A-3 is part of the Pūpūkea Forest Reserve and, unless the Army requests an exemption, it is “open to the public and under the control of the State of Hawai‘i from dusk on Friday to midnight on Sunday, and from dawn to midnight on national holidays” (DLNR 2017:11). Even though access is limited under the terms of the lease to the weekends and holidays, the Pūpūkea Forest Reserve Management Plan indicates that the public accesses the forest reserve for recreation seven days a week and “a conflict

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<sup>7</sup> These procedures were developed in consultation with NHOs and consulting parties who chose to participate in consultation.

between training and public recreation has not surfaced” (DLNR 2017:24). This public access does not include vehicle access except for management or military purposes (DLNR 2017:23). As with other forest reserves in Hawai‘i, permits are required to conduct research within a forest reserve; for actions affecting any Endangered, Threatened, candidate or proposed species; for native invertebrate research and collection; to survey, monitor, research, collect, propagate, or outplant threatened and endangered plants; for camping; and for activities such as meetings, weddings, and community events or activities (DOFAW 2022g). In reference to cultural practices, “all persons wishing to collect forest items, such as ti leaves or bamboo, for personal or cultural use are required to obtain a collecting permit authorizing the collection in a specific area” (DOFAW 2022g).

Public access to KTA Tract A-3 is through a locked gate at the end of Pupukea Road and onto Kaunala Trail. Public vehicular traffic is not permitted beyond the locked gate; however, the public can walk around the gate to access Kaunala Trail and the Pūpūkea Forest Reserve (DLNR 2017:23). This trail provides public access to the interior of the Pūpūkea Forest Reserve for hiking, bicycling, and hunting, and like the rest of the forest reserve, the trail is only open on weekends and holidays (DOFAW 2022a). No approval is required from the Army to use Kaunala Trail (USAG-HI 2022). When the trail is open to the public, the State allows for overnight camping with a permit anywhere along the trail corridor (10 feet from centerline) (DLNR 2022a). In addition, Drum Road follows the southern border of the forest reserve and is used by hikers.

Pūpūkea Forest Reserve is designated by DLNR as Hunting Unit D. Game mammals, but not birds, may be hunted from one-half hour before sunrise until one-half hour after sunset on Saturday, Sunday, and State holidays. A hunting license with a current year Hawai‘i Wildlife Conservation stamp is required to hunt (DLNR 2022b). Hunters must check in and out at check-in stations or through a phone application but otherwise proceed without an escort (N. Vargas, DOFAW O‘ahu Branch, personal communication, July 2022).

## **7.2 POAMOHO ACCESS**

This section describes the Army and State policies for access to the Poamoho project area.

### **7.2.1 Army Policies**

The Army manages an access policy for NHOs and consulting parties for Poamoho per the 2018 PA, the same PA that applies to KTA. See Section 7.1.1 for full details of the 2018 PA.

### **7.2.2 State Policies**

All of the Poamoho project area is part of the ‘Ewa Forest Reserve (Poamoho), which does not, as yet, have a management plan. The public is generally free to enter during daylight hours, except during periods

of military use. As stated in the discussion about the Pūpūkea Forest Reserve in Section 7.1.2, permits are required under certain circumstances within forest reserves, including to collect forest items for personal or cultural use (DOFAW 2022g). Two hiking trails are used as the main access points to Poamoho, including the 3.5-mile Poamoho Ridge Trail and 6-mile Poamoho Hele Loa Access Road located along the northern border of Poamoho, and the 4-mile Schofield-Waikāne Trail located along the southern border. Approximately 5 miles of these trails are within the northern and southern boundaries of Poamoho. Most of Poamoho has steep terrain and topography that makes it difficult to access.

Access to Poamoho Trail for hiking and biking requires no permit and is open seven days a week during daylight hours; however, a permit is required for vehicle access, with permits only being issued for Fridays, Saturdays, Sundays, Mondays, and State/federal holidays (DOFAW 2022c). After receiving the vehicle permit, an access permit and a code to an unguarded access gate will be provided to the vehicle permit holder and they proceed without an escort (Nicholas Vargas, DOFAW, O’ahu Branch, personal communication July 2022). No camping is allowed along Poamoho Trail (DOFAW 2022c). Access to the Schofield-Waikane Trail requires a letter of permission from the DPW’s Real Property Office (USAG-HI 2022; DOFAW 2022d). The trail begins on part of Schofield East Range, at the end of California Avenue, and is accessible on weekends from sunrise to sunset. The request for access letter must be signed and forwarded to the Real Property Office a minimum of 10 business days prior to the date of the requested hike (USAG-HI 2022). The Kaukonahua Ditch Trail is accessed from the Schofield-Waikāne Trail and is used by the USGS to reach a stream gaging station.

‘Ewa Forest Reserve (Poamoho) is designated by DLNR as Hunting Unit G and only game mammals may be hunted (DLNR 2022b). Hunting is allowed on Fridays, Saturdays, Sundays, Mondays, and state/federal holidays with an annual access permit obtained from the DOFAW O’ahu Branch office (DOFAW 2022c). This permit is in addition to the hunting license with a current year Hawai’i Wildlife Conservation stamp that is required to hunt within the State (DLNR 2022b). As stated above, a vehicle permit is required if driving into Poamoho.

### **7.3 MMR ACCESS**

This section describes the Army and State policies for access to the MMR project area.

#### **7.3.1 Army Policies**

The access policy provided by the 2018 PA (discussed in Section 7.1.1) does not apply to MMR. There are two separate access policies in place for MMR: 1) the 2000 *Programmatic Agreement Among the 25th Infantry Division (Light) and the United States Army Hawaii, the Ukanipo Heiau Advisory Council O Wahipana O Makua, and the Hawaii State Historic Preservation Officer, for Section 106 Responsibilities for the Aboriginal Hawaiian Use of Ukanipo Heiau Complex at Makua Military Reservation* (PA), and 2) the

2001 Settlement Agreement and Stipulated Order, including 2001 Appendix A (Access by Members of Mālama Mākua and/or Members of the Wai‘anae Coast to Observe Training at Makua Military Reservation), 2002 Appendix B (Notice Regarding Cultural Access Agreement), 2008 Modification 1 (First Modification to Appendix B, Daytime and Overnight Access to Makua Military Reservation (“MMR”) for Cultural Access), and 2018 Modification 2 (Joint Notice Regarding Second Modification of Cultural Access Agreement). The procedures in these PAs, including appendices and modifications, were developed in consultation with NHOs and consulting parties who chose to participate in consultation. In addition to the access policy documents, the Army published a list of sites deemed “high priority” for UXO clearance to facilitate “safe and controlled” cultural access to select MMR resources.

The 2000 PA recognizes Ukanipo Heiau Advisory Council O Wahipana O Makua (Council) as stewards of the site and provides “the Council reasonable access to the Ukanipo Heiau Complex through the gate along Farrington Highway and the MMR Range Operations Office. Reasonable access will be based on military activities, site safety and timely notification of the request to enter to DPW, Environmental Conservation/Cultural Resources Office” (U.S. Army, Hawaii [USAH] 2000:2). The PA also establishes the following responsibilities for the Council as stewards of the site: “maintain the landscaping, maintain the erosion control features, monitor effects of use of the site, develop interpretative and educational programs, and implement access and cultural protocols” (USAH 2000:4). In addition, it is the Council’s responsibility to ensure individuals, who are given permission by the Council to access the site, check in at the MMR Range Control before entering the site (USAH 2000:4).

The 2001 Settlement Agreement and Stipulated Order is a settlement agreement between Mālama Mākua and the Department of Defense that requires, in part, the Army to prepare an EIS to address potential impacts in resuming military training at MMR<sup>8</sup> and to identify, in consultation with residents of the Wai‘anae Coast, “high priority areas at MMR for UXO clearance, with a focus on increasing access to cultural sites” (Mālama Mākua v. Rumsfeld 2001a:2, 7–8). A stipulation regarding cultural access to MMR is included in the court order (Mālama Mākua v. Rumsfeld 2001a:11):

Members of the Wai‘anae Coast community, including Mālama Mākua, will be allowed daytime access (sunrise to sunset) to MMR to conduct cultural activities at least twice a month. Additionally, members of the Wai‘anae Coast community, including Mālama Mākua, will be allowed overnight access (from two hours before sunset on the first day until two hours after sunset on the second day) to MMR to conduct cultural activities on at least two additional occasions per year. During the first year following the Court’s approval of this Agreement, Mālama Mākua will be allowed overnight access on at least one additional occasion – from December 14 through December 15, 2001 -- for observance of the Makahiki. . . The cultural access provided for in this

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<sup>8</sup> The Final EIS for MMR was completed in 2009 with required supplemental reports completed in 2015.

paragraph will be subject to limitations determined by defendants in consultation with native Hawaiian cultural practitioners, including those from Mālama Mākua, based on requirements for training, safety, national security, and compliance with applicable laws and regulations. . .

In December 2001, Appendix A (Access by Members of Mālama Mākua and/or Members of the Wai‘anae Coast to Observe Training at Makua Military Reservation) was appended to the 2001 Settlement Agreement and Stipulated Order to provide guidance on access to MMR for live-fire training observations by Mālama Mākua and members of the Wai‘anae Coast prior to 2004. After 2004, live-fire training was suspended within MMR. This document states the Army will provide an escort to members of the public accessing MMR and visitors will follow certain protocols prior to entering MMR, including providing a picture identification to verify identity, agreeing to a possible bag search, signing a log in at the MMR Range Control, signing a waiver of liability, and listening to a safety briefing (*Mālama Mākua v. Rumsfeld* 2001b).

In 2002, Appendix B (Notice Regarding Cultural Access Agreement) was appended to the 2001 Settlement Agreement and Stipulated Order and “establishes the guidance for daytime and overnight access into the Makua Military Reservation (“MMR”) for cultural activities” (*Mālama Mākua v. Rumsfeld* 2002:1). The appendix restates the access stipulation laid out in the 2001 Settlement Agreement and Stipulated Order, which is quoted above, and establishes the protocols for cultural access, which were agreed to through consultation. Per the 2002 guidance, parties to the settlement agreement confer three times a year to set cultural access dates that are mutually agreeable (*Mālama Mākua v. Rumsfeld* 2002:1). Access times are defined as sunrise to sunset for daytime access and “no earlier than two (2) hours before sunset on Day One and concludes no later than two (2) hours after sunset on Day Two” for overnight access (*Mālama Mākua v. Rumsfeld* 2002:2). Access groups are not to exceed 50 people<sup>9</sup>, while observances for the opening and closing of Makahiki are allowed no more than 100 people (*Mālama Mākua v. Rumsfeld* 2002:2–3). Cultural access is open to the Wai‘anae Coast community, including Mālama Mākua, and their guests; if the Army receives an access request from Mālama Mākua and another applicant for the same date, the Army will consult with both parties to determine if concurrent access is agreeable. If concurrent access is determined incompatible, “Mālama Mākua will be afforded exclusive access on the date in question, and the Army may consider to accommodate the proposed concurrent access on another date” (*Mālama Mākua v. Rumsfeld* 2002:3). Requests for daytime or overnight access to MMR must include proposed access dates, description of proposed activities, anticipated number of participants, locations the group is seeking access, and point of contact for the group (*Mālama Mākua v. Rumsfeld* 2002:4). Once

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<sup>9</sup> The Army provided clarification that a 2016 modification to the MMR cultural access policy lowered this number to 40 people based on the results of a safety analysis (D. Crowley, USAG-HI, personal communication, September 2022).



access has been approved, the names of participants are provided to the Army at least two days prior to the access date (Mālama Mākua v. Rumsfeld 2002:5). Appendix B also states the Army “shall not deny or otherwise restrict any access pursuant to the Settlement on the ground that, in the Army’s view, it is not a traditional cultural practice or is otherwise culturally inappropriate” (Mālama Mākua v. Rumsfeld 2002:4).

After arrival and prior to entering the MMR, participants follow the same protocols established in Appendix A to the 2001 Settlement Agreement and Stipulated Order, including providing a picture identification to verify identity, agreeing to a possible bag search, signing a log in at the MMR Range Control, signing a waiver of liability, and listening to a safety briefing (Mālama Mākua v. Rumsfeld 2002:6). An Army escort is provided to each cultural access group (Mālama Mākua v. Rumsfeld 2002:6). The Army reserves the right to remove any participant from MMR who is exhibiting disruptive behavior, which “includes, but is not limited to, acts that endanger themselves or others, failure to abide by guidance from escorts, or attempting to enter unauthorized areas of MMR” (Mālama Mākua v. Rumsfeld 2002:6).

Due to safety concerns, participants are not “allowed to roam freely” and will only be allowed “in specific areas using specific routes” that have been subsurface cleared of UXO while remaining with “escorts at all times and will be allowed access to specific sites<sup>10</sup> using specific routes outlined by Range Control personnel, the Army’s DPW Cultural Resources Office, and their escorts” (Mālama Mākua v. Rumsfeld 2002:7). Also due to safety concerns, participants must wear covered shoes while on MMR, except around MMR Range Control<sup>11</sup> (Mālama Mākua v. Rumsfeld 2002:8). Unless given written authorization by the Army, participants are not allowed to modify existing cultural sites by adding or removing stones. Participants cannot erect new permanent structures; however, with permission from the Army, temporary structures may be erected, which are to be removed after a pre-approved time (Mālama Mākua v. Rumsfeld 2002:7).

In 2008, the first modification to the 2001 Settlement Agreement and Stipulated Order changes the limitation requirement for covered shoes while on MMR to include more areas that do not require covered shoes to be worn. Originally stated in Section 8, Subsection C, Item 8 of Appendix B of the settlement agreement, shoes were required everywhere on MMR, except around Range Control (Mālama Mākua v. Rumsfeld 2002:8). Modification One lists additional specific areas exempt from the covered shoe rule, including cut grass areas around certain ahu and petroglyphs (Mālama Mākua v. Gates 2008:1).

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<sup>10</sup> See later in the section for list of “specific sites.”

<sup>11</sup> This stipulation was later modified. See first and second modifications to the 2001 Settlement Agreement and Stipulated Order described later in the section for further information.

In 2009, the Army published a list of sites deemed “high priority” for UXO clearance<sup>12</sup> (Margotta 2009). The Army provided opportunities for the Wai‘anae Coast community to participate in identifying and prioritizing sites for cultural access, and the Army used this community input and considerations for safety to human health and environmental concerns when compiling the final list (Margotta 2009:1). The sites on the list were prioritized for UXO clearance, but the clearance was “subject to the availability of funds, safety concerns, environmental law requirements and available and appropriate technologies and methods” (Margotta 2009:1–2) The Army recognized the cultural importance of these sites and agreed to perform “good faith efforts to provide safe and controlled access to these areas as envisioned by the 2001 Settlement” (Margotta 2009:2). The 22 sites on the list included Sites 4536, 4540, 4542, 4627 to 4630, 5587 to 5590, 5920, 6505, 6506, 6508, 6593, 6596, 6597, 6603, 6613, 6621, and 9523 (Margotta 2009:3). It should be noted that Sites 4540 and 5587 to 5590 are within the Improved Conventional Munitions (ICM) area and were “deemed too dangerous to clear” unless future UXO technology improved to allow for safe clearance (Margotta 2009:2). The Army provided clarification that the ICM sites were exchanged through community consultation for UXO clearance of Sites 4537, 4546, 5456, and 5926 (D. Crowley, USAG-HI, personal communication, September 2022).

In 2018, the second modification to the 2001 Settlement Agreement and Stipulated Order further changes the limitation requirement for covered shoes while on MMR. An additional area mauka of Range Control was added to the areas that do not require covered shoes to be worn (Mālama Mākua v. Mattis 2018:1).

### **7.3.2 State Policies**

According to the 65-year lease (State General Lease No. S-3848) for the State-owned land at MMR, the land between the ocean and the beach road makai of Farrington Highway, including Mākua Beach, is “fully available” to the public, except during periods of military use (DLNR 1964c:5). Mākua Beach is open to the public for recreation, but the State does not allow camping at the beach (DLNR 2022c). The lease also gives the State “the right to develop and use for public purposes Kaneana Cave . . . together with an access foot trail thereto and a parking area adjacent to Farrington Highway” (DLNR 1964c:6), and the public regularly accesses Kaneana Cave today.

The Kuaokalā Trail runs along the northeast border of the North Ridge Tract and requires a DLNR day use permit for access; the trail is accessed via the Ka‘ena Point Satellite Tracking Station Road or the Kealia Access Road and Trail (DOFAW 2022e, 2023). State hunting areas are located to the north, east, and south

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<sup>12</sup> The Army provided clarification that UXO clearance includes a UXO technician removing ordnance from up to one foot below the surface in access paths and around sites, as well as double-checking for UXO within these areas prior to cultural access visits. (D. Crowley, USAG-HI, personal communication, November 2022).

along the MMR borders, but hunting is not permitted within MMR (U.S. Army Environmental Command [USAEC] and USACE 2009:3-21).

#### 7.4 ACCESS DISCUSSION

Although the Army and the State maintain access agreements, access and/or the perceived lack of access, whether experienced directly or indirectly, were routinely reiterated during interviews for each project area: access was mentioned in four of eight (50%) interviews for KTA, four of seven (57%) interviews for Poamoho, and eight of ten (80%) interviews for MMR. One of the ten interviewees (Mr. Oliveira at MMR) shared a personal experience with impacts to access (see interview excerpt below). According to Mr. Kajihiro, for example, “Kānaka Ōiwi and the general public currently only have limited access to the three parcels, and therefore, are denied the right to fully enjoy and conduct cultural, religious, or subsistence practices until the lands are cleaned up and restored” (Kajihiro 2021:10). He further emphasized the need for “safe, meaningful, and regular cultural access” to the State-owned lands (Kajihiro 2021:13).

Four of the eight interviews (Mr. Cáceres, Mr. Kajihiro, Mr. Lenchanko, and Mr. Oliveira) for the KTA project area and its broad geographical area mentioned access, and the access excerpts below are from the summary interviews in Appendix D:

- Mr. Cáceres: “[T]he land the Army leases is inaccessible to the public.” “[P]eople go around the Army lands and disrupt burial sites” and “people would not be going in these areas if they had access through the land the Army leases.” “[A]ccess is impacted by the Army’s retention of the land in Kahuku.”
- Mr. Kajihiro: “[N]ot having access to KTA limits our knowledge base for the area.” “[R]estriction of access causes cultural harm by impeding cultural practices and resulting in the erosion of historical knowledge over time.” “[T]he community who are affected and most connected to these places should be the ones who determine access and proper use and should be involved in shaping a cultural use plan that incorporates revitalizing cultural practices and re-connecting people to the land.”
- Mr. Lenchanko: “[A]ccess to land retained by the military makes it impossible for Hawaiians and practitioners to assess what cultural resources are still there. Lack of access prevents practitioners from doing any traditional practices and connecting to ancestral lands.” “TCPs have so much potential for cultural use, but the people are not able to access them.” “[D]evelopment often impacts cultural resources like native plants and animals, but they have little way of knowing what remains when they do not have access to these lands.” “Should the military retain their lease, . . . the people should be granted a perpetual easement that grants them access to the property to perform traditional practices and access cultural resources.” “Because the people do not have access to these lands, they have the right to know what is still there and how it is being impacted.”

- Mr. Oliveira: “[T]he military retaining the land prevents people from accessing the land and denies them the ability to practice any traditions they might want to restore and practice.” “As best practice, . . . the Army find a way to accommodate the people’s needs to access these lands beyond means of worship and cultural practices.”

Four of the seven interviews (Mr. Cáceres, Mr. Kajihiro, Mr. Lenchanko, and Mr. Oliveira) for the Poamoho project area and its broad geographical area mentioned access, and the access excerpts below are from the summary interviews in Appendix D:

- Mr. Cáceres: “[T]he Army holding lease over the lands in Poamoho prevents cultural practitioners and Kānaka Maoli from accessing the land for whatever traditional customs they practice, including gathering.” “[T]he Army lease currently prevents cultural practitioners and Native Hawaiians from accessing the land to use it for cultural and traditional practices and that the renewal of their lease would continue to impact access.” “[I]t would be better if there was some kind of Native Hawaiian Organization that had jurisdiction over the stewardship of the land, and it was not just the Army managing the parcels and limiting access. This organization could ensure that the land was being cared for properly and practitioners and Hawaiians had access to these lands.”
- Mr. Kajihiro: “[O]ne of the biggest impacts the military has on Poamoho is its restricted access to cultural sites and landscapes” and “this restriction and control of the access to these areas limits the cultural knowledge and familiarity for the native peoples who have lineal and cultural ties to this particular area.” “[B]y restricting access, the Army prevents those with cultural and genealogical ties to this land from exercising their responsibilities to those lands” and “it prevents those who have knowledge of these lands and associated cultural sites and practices from teaching and transferring that knowledge to future generations.” “[W]ith limited or no access, the knowledge and practices associated with these areas can be lost or degraded and Native Hawaiians who may have ancestral ties to those lands become alienated from those lands and histories.” “[S]hould the Army retain the leased lands of Poamoho, . . . the Army not control the access completely and there should be a Hawaiian community group in charge of planning activities for environmental and cultural restoration and revitalizing cultural practices to Poamoho.”
- Mr. Lenchanko: “If Hawaiians and community members were given access to this land parcel, they would be able to begin restoration efforts including invasive species removal and planting native plants right away.” “Without access to this land, it is difficult for practitioners . . . to understand the needs of the land which has been mismanaged for years.” “[T]hey know there are cultural resources in that area, but it is impossible for them to know what they are and what is still there without access. There is no way for practitioners to know if there are native plants and resources still in the area because they do not have access.” “[H]unters do not currently have access to the land in Poamoho and would have to trespass in order to practice hunting, lā’au lapa’au, and other traditional activities in the mauka Poamoho area.” “[A]ccess

is a major issue that impedes cultural resources and traditional practices in Poamoho. Practitioners do not currently have any customary rights to access that resource. Without access to that land, practitioners have no way of knowing what is there, what the land needs, and how it can benefit the people. They are unable to know exactly what native plants, species, and resources are still there. They cannot access the land for hunting or water resource management. The forest, [considered] to be a cultural resource, has become unknown to them.” “[K]ūpuna fought for access to places like Poamoho in order to preserve and adapt cultural traditions and practices. Denied access means the people are unable to foster a traditional comprehension of place.” “Hawaiian kūpuna intended for lands like Poamoho to be passed down and maintained by Hawaiians in continuity. The Army retaining the land prevents the ability to carry on this responsibility and access traditional and cultural resources.” “[T]he land currently leased by the military in Poamoho will be overseen by DOFAW [Hawai’i Division of Forestry and Wildlife] and that the community will be given access to this area to practice forest and land restoration and rebuild their traditional and cultural practices.” “If in 2029 the Army continues to retain their lease of Poamoho, . . . perpetual access be granted to the people so they can utilize whatever part of the property they need. Part of that need for access is so practitioners can do a cultural analysis of how to use the land and its cultural resources.” “[T]he Army to do an assessment of the land they use for training that includes and recognizes a Hawaiian perspective on the cultural resources and traditions in the area and grants access to the people.” “Because the people do not have access to these lands, they have the right to know what is still there and how it is being impacted.”

- Mr. Oliveira: “Being withheld from accessing sacred lands impacts the people and cultural practitioners. It prevents them from accessing sacred and significant sites to carry out various traditions including worship.” “As a best practice, . . . the Army find a way to accommodate the people’s needs to access these lands beyond means of worship and cultural practices.”

Eight of the ten interviews (Mr. Ailā, Mr. Apo, Mr. Cáceres, Mr. Enos, Mr. Hannahs, Mr. Kajihiro, Mr. Lenchanko, and Mr. Oliveira) for the MMR project area and its broad geographical area mentioned access, and the access excerpts below are from the summary interviews in Appendix D:

- Mr. Ailā: “[F]or Makahiki, they are restricted to the front part of the valleys.” “[I]f there is a good commander, the valley may be a little more open; if it is a bad commander, . . . it’s much harder to get access to the valley.” “[T]he military also prevents access to heiau (such as Site -4546) in the area and prevent the presentation of certain types of ho’okupu on the heiau.”
- Mr. Apo: “[C]ultural access to the valley is important.”
- Mr. Cáceres: “[T]he group, Mālama Mākua, tries to use their community days to take people to significant sites in Mākua since access to these cultural resources has been impeded for years.” “One tradition connected to the area is gathering medicinal plants, which is currently impossible to do given the lack

of access to the valley.” “[I]f the military’s lease is renewed in 2029, . . . one of the conditions should be that no training occurs in the valley and the military’s efforts are strictly geared towards clean up and providing access for the community.”

- Mr. Enos: “Within the valley there are many cultural sites as well as native species” and “accessing these sites and resources is difficult given the military’s occupation of the land.” “[T]he Army should work to clean up the land and restore it to its original state so that it is safe to access again.”
- Mr. Hannahs: “If practitioners don’t have unfettered access, how do they cultivate pilina [connection] to the place?”
- Mr. Kajihiro: “[T]here are petroglyphs in the backside of the valley; however, restricted access to these areas have made it challenging to know exactly where these sites are.” He has “spoken to kūpuna who have lineal ties to Mākua Valley and who speak of family burials within the valley” and “they believe they do not have access to these burials due to the military’s occupation of the valley.” “Mālama o Mākua has monthly access to only certain sites in the valley and that cultural practices are constrained.” “Mālama o Mākua have not been allowed to repair sites, give certain types of ho’okupu, remove invasive plants, or plant native species, Hawaiian crops, and medicinal plants.” “[T]he negative impacts that the military has had over the cultural resources, landscape, and access to ancient cultural sites due to their occupation of Mākua . . . include devastation of native plants and natural resources, restricted and unobtainable access to iwi kūpuna and wahi kapu, unexploded ordnance, fires, and erosion of the valley.”
- Mr. Lenchanko: “Due to lack of access, . . . unsure of what cultural resources remain in Mākua.” “[A]ccess to land impacts cultural resources and traditional practices. Military reservations prevent people from accessing resources regularly. In Mākua, it is dangerous because there are explosives still on the property, making it much more difficult for people to access this place as a traditional cultural property. Practitioners and descendants are unable to access this land to carry out their traditions and make connections to the land and their ancestors.” “The military attempts to grant supervised access, but this process is complicated and still prevents the people from fulfilling their responsibility to this land.” “[C]ultural practitioners and Mākua families should be given back perpetual access to their land.” “Since the people do not have access to these lands, they have the right to know what is still there and how it is being impacted.”
- Mr. Oliveira: “[L]ack of access to Mākua due to the military’s presence and the threat of remaining ordnances makes it impossible for the people and practitioners to utilize this culturally significant site. The valley cannot be accessed, and there is no way for people to know what resources remain there and prevents them from going there to worship and practice their culture.” He “has been denied access in the past to honor iwi kūpuna.” “As a best practice, . . . the Army find a way to accommodate the people’s needs to access these lands beyond means of worship and cultural practices.”

As can be seen in these interview excerpts and the previous sections describing access to each project area, there is a misunderstanding between what the Army provides for access, what the State allows for access, and what informants desire to be sufficient access. There may be several reasons for this misunderstanding, including 1) lack of awareness and/or understanding of the Army's access policies, 2) lack of awareness and/or understanding of the State's access policies, and 3) the perceived inability of the Army's access programs to provide unlimited access to engage in cultural practices and beliefs. This misunderstanding is also carefully considered in Chapters 8 and 9, but it will not be resolved in this document since future and ongoing community engagement would be needed.

While there may be gaps in awareness and/or understanding of the Army's cultural access policy, the policy for the MMR project area is publicized on the Mālama Mākua website. Community members typically need to go through Mālama Mākua for site access; although request for access by Wai'anae Coast community groups/individuals outside of Mālama Mākua is included in the 2001 Settlement Agreement and Stipulated Order for MMR (*Mālama Mākua v. Rumsfeld* 2002:3). For the KTA and Poamoho project areas, access via trails into the project areas' forest reserves is also published on DOFAW's Nā Ala Hele Trail & Access Program website. The access program provided by the 2018 PA for the KTA and Poamoho project areas seems less well known. Informants consulted for the current study seemed generally unaware of access being granted by the Army or the State within these two project areas.

Formal access requests are low for the KTA and Poamoho project areas. According to USAG-HI, no access requests were received for Poamoho within the last year (2022), while two access requests were received and granted for KTA. These two access requests for KTA were for areas outside of the KTA project area (D. Crowley, USAG-HI, personal communication, November 2022). Approximately 30 access requests were received and accommodated by USAG-HI for MMR within the last year (2022). According to USAG-HI, all requests are accommodated provided the requesting individual and/or group follows safety procedures (D. Crowley, USAG-HI, personal communication, November 2022).

#### **7.4.1 Significance Criteria for Access**

Per the OEQC guidelines, even if a Proposed Action may not physically alter cultural practices, its potential to affect access into areas that are important for cultural practices should still be assessed (OEQC 2012:11). The ability of Native Hawaiians to access cultural resources, practices, and beliefs within the project areas is one of the critical means by which the Proposed Action and its alternatives were assessed.

This access, however, is not to be understood in the same way as public access (i.e., open access for the general public). The type of access this analysis considers is—for the purposes of the current study—termed “cultural access.” The current study defines cultural access in the following way:

Cultural access: the ability of Native Hawaiians and other ethnic groups to enter an area for the purposes of connecting with cultural beliefs, participating in cultural practices (including, but not limited to, use and possession of sacred objects, and freedom to worship through ceremonials and traditional rites), and/or engaging with culturally significant resources (such as visiting culturally significant archaeological sites, accessing manmade and natural cultural features, collecting medicinal plants, etc.) that are directly associated with the area.

It should be noted that in no portion of the project areas is cultural access wholly prohibited and/or restricted. The potential then for the Proposed Action to impact cultural access is defined in terms of its limiting potential:

Limited cultural access: the ability of Native Hawaiians and cultural practitioners to access cultural resources and practices is limited in that it must meet certain requirements for it to be granted. Such requirements may include having an escort, timing of access, or that certain locations are off limits due to security or safety concerns.

The form of access valued by interviewees for the current study seems to be the following:

Unlimited cultural access: the ability of Native Hawaiians and cultural practitioners to access cultural resources and practices is unhindered by requirements for permit, prior approval (e.g., by letter, official approval list, etc.), escort provision, and/or limitations due to allowable hours for access (e.g., only accessible on weekends, weekdays, etc.), and/or other legal concerns (e.g., trespassing).

The significance criteria under which these parameters are assessed in the current study is the extent or degree to which:

- Cultural access (see definition of cultural access above) within the State-owned land is limited.
- Cultural access is limited for the foreseeable future.

Military activities, for example, with designated access requirements that limit the ability of Native Hawaiians and other ethnic groups to enter an area for the purposes of connecting with cultural beliefs, participating in cultural practices, and/or engaging with culturally significant resources for the foreseeable future would have a significant impact on cultural resources.



## 8 ANALYSIS OF EFFECTS FROM THE PROPOSED ACTION AND ITS ALTERNATIVES

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This chapter analyzes the effects presented in Sections 4.4, 5.4, and 6.4 to assess the potential impact of the Proposed Action and its alternatives on cultural resources, practices, and beliefs relevant to each project area. The analysis also considers impacts from a renewed lease versus a fee simple title ownership for land retention.

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 lands. It does not include construction or proposed changes to the current levels or types of activities conducted within the State-owned lands (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 in Section 3.4 within the O'ahu ATR EIS and the accompanying Historical and Cultural Resources Literature Review (Gross et al. 2023; Appendix I to the O'ahu ATR EIS). The effects to cultural practices and beliefs that may be associated with such archaeological sites are addressed in the current section.

### 8.1 KAHUKU TRAINING AREA

This section assesses the effects of the Proposed Action on cultural resources, practices, and beliefs associated with the KTA project area. The assessment of effects considers each of the three alternatives for the KTA project area, as presented in the sections below.

#### 8.1.1 Alternative 1: Full Retention

Under Alternative 1, the Army would retain all State-owned land (approximately 1,150 acres) at KTA and would continue to conduct ongoing activities (see O'ahu ATR EIS, Chapter 2 for a detailed discussion of ongoing activities). Alternative 1 does not include construction or changes in military activities or cultural resources management actions.

Section 4.4 lists potential impacts to cultural resources, practices, and beliefs associated with the KTA 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), an impact noted by interviewees for the KTA project area includes physical alteration on cultural resources from continued ongoing military activity. Three interviewees noted physical impacts from general military training (Mr. Hannahs, Mr. Oliveira, and Mr. Cáceres), while one interviewee commented specifically on impacts from the use of munitions (Mr. Grace). These impacts, as stated by interviewees, were not directly associated with State-owned land at KTA (the KTA project area), but rather the broader Kahuku Training Area. Further, physical effects from munitions are not likely to occur from military retention of the State-owned land at KTA due to the lack of current live-fire training at KTA. The EIS associated with the current study further found that physical impacts on tangible cultural resources (i.e., archaeological sites) were more likely to occur from ongoing public (off-roading) activity than from military training at KTA (see O'ahu ATR EIS, Chapter 3). Physical impacts on cultural resources are also managed and mitigated by existing agreements (see Section 9.1).

A second impact noted by interviewees 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. Four of the eight interviewees noted several practices that are dependent on the setting of the project area (the 'āina), to which cultural access is limited, according to the interviewees. These include the ability to mālama 'āina (Mr. Lenchanko), practice burial maintenance (Mr. Cáceres), as well as general practices not disclosed (Mr. Oliveira).

Section 7.1 discusses the access policies of the State and the Army for the KTA project area (Tracts A-1 and A-3). Cultural access is currently limited within Tract A-1 and unlimited in Tract A-3. Limitations within Tract A-1 include restricted hours to weekends and federal/State holidays due to military training. Cultural resources, practices, and beliefs are, therefore, periodically isolated from their setting due to limitations on cultural access within Tract A-1, but not within Tract A-3. According to USAG-HI, no requests to enter either Tract A-1 or Tract A-3 for cultural access have been received within the last calendar year (2022); only two cultural access requests were received by USAG-HI during that time, and these were for areas outside of the State-owned lands at KTA. Impacts to cultural access, therefore, appear to be minimal.

Other general environmental impacts identified by interviewees (e.g., watershed impacts, erosion) were not directly associated with State-owned land (Tracts A-1 and A-3) at KTA.

Interviewees disclosed no other effects from continued military activity that specifically impacted cultural resources, practices, and/or beliefs within the direct project area.

**Lease Impacts** – Since there is currently limited cultural access within a portion of the KTA project area (Tract A-1), Native Hawaiians and cultural practitioners face minimal limitations on their ability to access cultural resources and practices within the project area; however, no access requests have been received for the State-owned land at KTA. This results in continued, long-term, negligible, adverse impacts on cultural access. Conversely, continued, long-term, minor, beneficial impacts would result from current cultural resources stewardship activities that serve to preserve and protect cultural resources. Once a new lease was to end, however, potential restoration actions could potentially result in short-term limitations on cultural access due to public safety concerns from potential forest enhancement and other possible restoration activities. Lease compliance parameters would be defined and determined after completion of this EIS, but they would comply with Section 106 and its implementing regulations. Impacts on cultural resources during restoration would continue to be mitigated by the Army in compliance with these existing regulatory requirements.

To continue to avoid and minimize potential adverse impacts on cultural resources, and to protect and preserve extant cultural resources and practices, the Army would continue to fund its cultural resources commitments on the State-owned land, in accordance with the 2018 PA, which include a cultural access program. No additional NHPA mitigation measures are required beyond those prescribed in the PA.

Any change in land use by the Army that presents potential impacts on cultural resources, practices, and beliefs not resolved previously through the PA and/or current access policies would require separate NEPA (and possibly HEPA) analysis and NHPA compliance.

**Fee Simple Title Impacts** – Similar to a lease retention, there would be continued long-term, negligible, adverse impacts to cultural resources, practice, and beliefs within Tract A-1 from ongoing cultural access limitations, which would continue to be limited to weekends and federal/State holidays. For Tract A-3, there would be continued long-term, negligible, beneficial impacts since cultural access is permitted within the Pūpūkea Forest Reserve. This analysis assumes the Army would continue to adhere to the same federal laws and regulations for managing cultural resources, including maintaining current access policies that permit spatial and temporal cultural access within the project area, with few limitations. Impacts from lease compliance actions would not occur under fee simple title ownership.

### **8.1.2 Alternative 2: Modified Retention**

Under Alternative 2, 450 acres of State-owned land at KTA would be retained while the remaining State-owned land would not be retained, as described below.

### **8.1.2.1 Land Retained**

Under Alternative 2, the Army would retain Tract A-1 at KTA, which includes approximately 450 acres, and all U.S. Government-controlled facilities and range roads throughout Tract A-1.

**Lease Impacts** – The retention of Tract A-1 would result in continued long-term, negligible, adverse impacts on cultural resources, practices, and beliefs from the continuation of ongoing activities, which include minimal limitations on cultural access within Tract A-1. Continued long-term, minor, beneficial impacts would result from current cultural resources stewardship activities that serve to preserve and protect cultural resources. Lease compliance activities at the end of a new lease would introduce new short-term, moderate, adverse impacts.

The Army would continue to adhere to cultural resources programs and agreements, as discussed under Alternative 1.

**Fee Simple Title Impacts** – A fee simple title method of land retention would result in the same parameters (e.g., acreage, minimal ongoing activities) and similar impacts as a lease retention method for Alternative 1 provided the Army continue to adhere to the same federal laws and regulations for managing cultural resources, including maintaining current access policies that permit spatial and temporal cultural access within the State-owned Land, with few limitations.

### **8.1.2.2 Land Not Retained**

Under Alternative 2, the Army would not retain Tract A-3 at KTA, which comprises approximately 700 acres of State-owned land in the foothills of KTA and supports only occasional training. The Army would no longer be responsible for management of 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 not retained, and, for the purposes of this study, it is assumed the State would adopt the Army's resource management commitments.

The non-retention by the Army of Tract A-3 would result in no significant long-term impacts for cultural resources, practices, and beliefs. The current study assumes the State would adopt the Army's resource management commitments and that current access policies would not change, resulting in continued cultural access.

Potential restoration actions, however, could potentially result in short-term limitations on cultural access due to public safety concerns from potential forest enhancement and other possible restoration activities. Lease compliance activities at the end of a new lease would introduce new short-term, negligible, adverse impacts. These impacts are assumed to be negligible due to the low occurrence of military activity during

the course of the lease within Tract A-3. 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 during restoration would continue to be mitigated by the Army in compliance with these existing regulatory requirements.

### **8.1.3 No Action Alternative**

Under the No Action Alternative, no State-owned land would be retained at KTA after expiration of the lease, and the current limited level of military training would cease. Non-retention of Tract A-1 would remove the minimal limitations on cultural access, while unlimited cultural access would continue in Tract A-3. At the end of the current lease, however, lease compliance actions may introduce new short-term limitations on cultural access.

## **8.2 KAWAIILOA-POAMOHO TRAINING AREA (POAMOHO)**

This section assesses the effects of the Proposed Action on cultural resources, practices, and beliefs. The assessment of effects considers each of the three alternatives for the Poamoho project area, as presented in the sections below.

### **8.2.1 Alternative 1: Full Retention**

Under Alternative 1, the Army would retain all State-owned land (approximately 4,390 acres) at Poamoho. This would include the continuation of limited reconnaissance and restricted maneuver training. There are no facilities or ranges at Poamoho. Alternative 1 does not include construction or changes in military training activities or cultural resources management actions.

Four of the seven interviewees for the Poamoho project area expressed cultural access concerns and the inability to engage in cultural practices within the setting of the project area (Mr. Cáceres, Mr. Kajihiro, Mr. Lenchanko, and Mr. Oliveira). Mr. Lenchanko elaborated by saying that without access to this land, it is difficult for practitioners like himself to understand the needs of the land. The perceived lack of access also prevents practitioners like himself from restoring cultural sites, or even finding them to maintain them. He believes there are cultural resources in the area, but that it is impossible for them to know what they are and what is still there without access.

Section 7.2 discusses the access policies of the State and the Army for the Poamoho project area. The Army manages an access policy for NHOs and consulting parties for Poamoho per the 2018 PA, the same PA that applies to KTA. According to the USAG-HI, no cultural access requests were received within the last calendar year (2022). All of the Poamoho project area is part of the 'Ewa Forest Reserve (Poamoho), and the public (e.g., including Native Hawaiians and cultural practitioners) is generally free to enter during

daylight hours, except during periods of military use. Permits are required under certain circumstances within the forest reserve, including to collect forest items for cultural use. Native Hawaiians and cultural practitioners can freely access Poamoho Trail, which is open to the public for hiking and biking and requires no permit; the trail is open seven days a week during daylight hours.

Other general environmental impacts identified by interviewees (e.g., watershed impacts, erosion) were not specifically tied to ongoing military activity or with the direct Poamoho project area (State-owned land). Other physical impacts noted by interviewees were on resources located outside of the Poamoho project area and were not directly impacted by the Proposed Action.

Interviewees disclosed no other effects from continued military activity that specifically impacted cultural resources, practices, and/or beliefs within the direct project area.

**Lease Impacts** – Continued long-term, negligible, adverse impacts would continue from minimal limitations on cultural access that limit Native Hawaiians and cultural practitioners from freely accessing cultural resources and practices with no permit, prior approval (e.g., by letter, official approval list, etc.), escort provision, and/or limitations due to allowable hours for access (e.g., only accessible on weekends, weekdays, etc.), and/or other legal concerns (e.g., trespassing). No foreseeable, additional limitations and/or restrictions would be implemented that are above current access policies or that would further limit spatial and temporal cultural access within the project area. Continued long-term, negligible, beneficial impacts would also result from current cultural resources management programs that serve to preserve and protect cultural resources; these impacts are negligible due to the low occurrence of ongoing activity within the Poamoho project area. New short-term, negligible, adverse impacts may result from lease compliance actions at the end of a new lease, which could implement short-term limitations on cultural access due to public safety concerns from potential forest enhancement and other possible restoration activities. These impacts are assumed to be negligible due to the low occurrence of military activity during the course of the lease within the Poamoho project area.

The Army would continue to adhere to cultural resources programs and agreements, as discussed under Alternative 1 for KTA.

**Fee Simple Title Impacts** – Impacts on cultural resources under a fee simple title method of land retention would result in similar ongoing impacts as a lease retention method for Alternative 1. Under fee simple, the Army would continue to adhere to the same federal laws and regulations for the management of cultural resources. This includes current cultural access commitments as well as mitigations measures if cultural resources were newly identified. Impacts from lease compliance actions would not occur under fee simple title ownership.

## **8.2.2 Alternative 2: Modified Retention**

### **8.2.2.1 Land Retained**

Under Alternative 2, the Army would retain the Poamoho Tract (approximately 3,170 acres).

**Lease Impacts** – Lease impacts under Alternative 2 would include continued long-term, negligible, adverse impacts from minimal limitations on cultural access; continued long-term, negligible, beneficial impacts from current Army cultural stewardship activities; and new short-term, negligible, adverse impacts from lease compliance actions at the end of a new lease, which could implement short-term limitations on cultural access.

**Fee Simple Title Impacts** – With the exception of associated impacts from lease compliance actions at the end of a new lease (as discussed for KTA in Section 8.1), fee simple title ownership would be similar to impacts from lease retention.

### **8.2.2.2 Land Not Retained**

Under Alternative 2, the Army would not retain the Proposed NAR Tract (approximately 1,220 acres), which is not currently used for ground training. It is assumed the State would adopt the Army's cultural resources management commitments to ensure cultural access continues within the State-owned Land. This would result in continued long-term, negligible, adverse impacts on cultural access since limitations exist under current State policies. New short-term, negligible, adverse impacts could occur from lease compliance actions, which are assumed to be negligible due to the low occurrence of military activity during the course of the current lease within the Proposed NAR Tract.

### **8.2.3 No Action Alternative**

Under the No Action Alternative, no State-owned land would be retained at Poamoho after expiration of the lease, and the current limited level of military training would cease. It is assumed the State would adopt the Army's cultural resources management commitments to ensure cultural access continues within the State-owned Land. This would result in continued long-term, negligible, adverse impacts on cultural access since minimal limitations would still exist under ongoing State policies. New short-term, negligible, adverse impacts could occur from lease compliance actions, which are assumed to be negligible due to the low occurrence of military activity within Poamoho during the course of the current lease.

## **8.3 MAKUA MILITARY RESERVATION**

This section assesses the effects of the Proposed Action on cultural resources, practices, and beliefs. The assessment of effects considers each of the four alternatives for the MMR project area, as presented in the sections below.

### 8.3.1 Alternative 1: Full Retention

Under Alternative 1, the Army would retain all State-owned land at MMR (approximately 782 acres) and would continue to conduct ongoing activities (military training limited to the Center Tract; facility, utility, and infrastructure maintenance and repair activities; associated activities such as emergency services; and cultural resources management actions, including ongoing cultural access programs). Alternative 1 does not include construction or changes in military activities or cultural resources management actions. The MMR project area would continue to see a decreased level of military activity in the State-owned land at MMR since the last occurrence of live-fire training in 2003 (followed by total suspension in 2004).

The primary concern expressed by interviewees regarding effects from continued military activity centers around the isolation of cultural practices and beliefs from their setting due to limited cultural access within the MMR project area. Seven of the ten individuals interviewed for the MMR project area expressed concerns with cultural access limitations.<sup>13</sup> Mr. Oliveira mentioned the inability to engage in the cultural practices of caring for iwi kūpuna and mālama ‘āina within the project area. Mr. Oliveira also specifically mentioned how retention of the land (the MMR project area) impacts the ability to engage in the system of ka‘ānani‘au, a system connected to temples and land divisions. Mr. Oliveira further discussed how lack of cultural access to the MMR project area, and Mākua Valley, due to the military’s presence and the threat of remaining UXO make it impossible for Native Hawaiians and cultural practitioners to utilize this culturally significant resource (the ‘āina itself). Mr. Oliveira asserted that the valley cannot be accessed and there is no way for people to know what cultural resources remain there, which prevents them from going there to worship and practice their culture.

Mr. Cáceres reiterated the inability to access the MMR project area to mālama ‘āina and care for the significant cultural resource, the land itself. Mr. Lenchanko also commented on limitations for cultural access for Native Hawaiians and cultural practitioners to make connections to the land and their ancestors. Mr. Lenchanko also mentioned that the land is dangerous with explosives from military activities, which make it impossible for people to reclaim and steward (mālama ‘āina) the land. Mr. Ailā also raised access concerns by stating that cultural access limitations prevent the presentation of certain types of ho‘okupu and that cultural practices along the shoreline and beaches are sometimes limited by unmanned aerial trainings.

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<sup>13</sup> One additional interviewee mentioned access (for a total of eight interviewees mentioning access) but did not mention a lack of access or indicate there were any issues with access.



Unlike the KTA and Poamoho project areas, cultural access in parts<sup>14</sup> of the State-owned land at MMR is, in fact, limited in that cultural access requests must meet certain requirements for it to be granted, such as community group coordination, escort availability, limited access times, and limitations on certain locations that are off limits due to security or safety concerns.

Although there are clear limitations within large portions of the State-owned land, these limits stem from health and safety concerns related to UXO and other hazards for which the Army must comply with the DoD Explosives Safety Board and US Army Technical Center for Explosives Safety policies and regulations. The 2001 Settlement Agreement attempted to balance public safety with the protection of Native Hawaiian beliefs and practices by developing cultural access protocols in consultation with NHOs.

The continuation of current military activity within portions of the MMR 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 per current and existing access agreements, but access would still be limited. The limited ability of Native Hawaiians and other cultural practitioners to access sacred āina within large portions of the State-owned land at MMR is a significant concern of the community.

The second general category of effect noted by informants included physical alteration on cultural resources from military training and munitions use. Mr. Cáceres mentioned physical impacts to the land and Mākua Valley (a significant cultural resource) from military training, including impacts from military ammunition. Mr. Cáceres further commented that ammunition and weaponry used in military training impacts the environment, including the land, water sources, and the ocean, all of which are significant cultural resources to Native Hawaiians. Mr. Lenchanko also discussed witnessing physical impacts from military live-fire training, including from munitions that landed close to cultural resource sites; although, the impacts mentioned by Mr. Lenchanko appear to have occurred outside of the project area for the current Proposed Action. Mr. Ailā, however, noted that munitions from outside the MMR project area have the potential to move downstream during heavy rains and contaminate groundwater and soil within the project area and the broad geographical area.

The continuation of military activity within the MMR project area does not include live-fire training, which was suspended in 2004; therefore, physical alteration on cultural resources from military munitions is not likely to reoccur. Additionally, the decreased level of military activity in the MMR project area since the suspension of live-fire training has resulted in no newly recorded impacts on cultural resources from

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<sup>14</sup> There is unlimited access on portions of the Makai Tract of the MMR project area, including Kāneana Cave, Mākua Beach, and the land between the ocean and the beach road makai of Farrington Highway.

current and ongoing activities. The Army would also continue to adhere to cultural resources programs and agreements, as discussed in Section 9.1.

Lastly, physical elements have been introduced that have altered the setting in which cultural practices take place within the MMR project area. This is a general concept repeated throughout informants' comments that Mākua Valley itself, including the project area, is a sacred setting, which is altered by the presence of military activity, and in particular, by debris (e.g., UXO) left by prior military activity that continues to adversely impact the landscape despite the suspension of live-fire training.

Other general impacts identified by interviewees (e.g., environmental impacts from large scale military land ownership, impacts from increased noise levels) involve other resource areas and/or were not directly associated with the MMR project area.

**Lease Impacts** – Alternative 1, lease retention, would result in continued long-term, significant, adverse impacts on cultural resources, practices, and beliefs from limited cultural access to State-owned land east of Farrington Highway as well as the introduction of physical elements that have significantly altered the setting in which cultural practices take place. The Army would continue to provide limited cultural access per current and existing access agreements, resulting in continued, long-term, moderate, beneficial impacts on cultural resources. Further, additional limitations, such as a reduction in the number of days when cultural areas can be accessed, would not occur. These are still, however, limitations that preclude Native Hawaiians and other cultural practitioners from freely engaging with cultural practices and beliefs within the State-owned land for the foreseeable future.

Additionally, new short- to long-term, significant, adverse impacts would be introduced at the end of a renewed lease due to the implementation of lease compliance actions (e.g., removal of military munitions), which could lead to significant ground disturbance and associated impacts on cultural resources, including additional limitations on cultural access.

**Fee Simple Title Impacts** – Similar to a lease retention, there would be continued long-term, significant, adverse impacts to cultural resources, practice, and beliefs from ongoing cultural access limitations, which would continue to be limited by spatial and temporal constraints into the foreseeable future. This analysis assumes the Army would continue to adhere to the 2001 settlement agreement and its subsequent amendments as well as other federal laws and regulations for managing cultural resources and providing cultural access. Impacts from lease compliance actions, however, would not occur under fee simple title ownership.

### **8.3.2 Alternative 2: Modified Retention**

#### **8.3.2.1 Land Retained**

Under Alternative 2, the Army would retain the North Ridge, Center, and South Ridge Tracts, approximately 572 acres of the State-owned land at MMR. Currently, training is conducted only within the Center Tract (and in areas where no tangible cultural resources are recorded within the tract). No training is currently conducted within the North Ridge or South Ridge Tracts.

**Lease Impacts** – There would be continued long-term, significant, adverse impacts on cultural resources from limited cultural access into the foreseeable future. Long-term, moderate, beneficial impacts would continue from ongoing actions associated with cultural resources stewardship programs since no military training occurs near known cultural resources. New, short- to long-term, significant, adverse impacts could, however, result from lease compliance actions at the end of a renewed lease.

**Fee Simple Title Impacts** – Impacts under a fee simple title method of land retention would result in similar impacts as a lease retention method for Alternative 2. The Army would continue to adhere to cultural resources programs and agreements that mitigate physical impacts on cultural resources. This would also include continuing to maintain current cultural access policies per the 2001 settlement agreement and its subsequent amendments. However, significant, adverse impacts associated with lease compliance actions would not result under fee simple title ownership.

#### **8.3.2.2 Land Not Retained**

Under Alternative 2, the Army would not retain the Makai Tract (approximately 210 acres), which includes land west of the ridges in the northern and southern portions of MMR and a portion of the area west of Farrington Highway that is not owned by the Army. Military training does not currently occur in the Makai Tract. The Army would no longer be responsible for management of 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.

The non-retention by the Army of the Makai Tract would, in theory, lift current limitations on cultural access to the northern portion of the Makai Tract that extends mauka of Farrington Highway<sup>15</sup>. This would result in new long-term, minor, beneficial impacts on cultural resources from the removal of limitations

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<sup>15</sup> There is already unlimited access on portions of the Makai Tract of the MMR project area, including Kāneana Cave, Mākua Beach, and the land between the ocean and the beach road makai of Farrington Highway.

on cultural access in these areas; impacts would be minor since there is already unlimited access in portions of the Makai Tract.

Potential restoration actions at the end of the current lease, however, would likely result in additional limitations on access due to public safety concerns from potential removal and/or detonation of UXO and other possible restoration activities. Restoration actions, particularly in association with the removal and/or detonation of UXO, may be particularly damaging to the landscape and result in long term limitations on cultural access and/or physical alteration on cultural resources. Since the Makai Tract is outside the main area of impact for former live-fire training at MMR, land restoration would be less intensive than in other portions of MMR. Additionally, restoration actions would determine how lands can be safely used (e.g., for cultural access).

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 non-retention by the Army of the Makai Tract and the lifting of current limitations on cultural access to the northern portion of the Makai Tract that extends mauka of Farrington Highway would also 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, as seen with impacts to cultural resources sites from public off-roading at KTA (see Section 8.1.1).

### **8.3.3 Alternative 3: Minimum Retention**

#### **8.3.3.1 Land Retained**

Under Alternative 3, the Army would retain only the Center Tract, approximately 162 acres of State-owned land.

**Lease Impacts** – Minimum retention under a new lease would result in continued long-term, moderate, adverse impacts on cultural resources from limited cultural access into the foreseeable future. Long-term, moderate, beneficial impacts would continue from ongoing actions associated with cultural resources stewardship programs since no military training occurs near known cultural resources. New, short- to long-term, moderate, adverse impacts would, however, result from lease compliance actions at the end of a renewed lease.

**Fee Simple Title Impacts** – Impacts under a fee simple title method of land retention would result in similar impacts as a lease retention method for Alternative 3. The Army would continue to adhere to cultural resources programs and agreements that mitigate physical impacts on cultural resources. This

would also include continuing to maintain current cultural access policies per the 2001 settlement agreement and its subsequent amendments. However, short- to long-term, moderate, adverse impacts associated with lease compliance actions would not result under fee simple title ownership.

#### **8.3.3.2 Land Not Retained**

Under Alternative 3, the Army would not retain the Makai, North Ridge, and South Ridge Tracts (approximately 620 acres of State-owned land).

Impacts under this alternative would result in new long-term, significant, beneficial impacts on cultural resources from the removal of limitations on cultural access in the land not retained—if restoration actions, such as the removal of UXO, were successfully achieved with minimal impact on cultural resources. Potential restoration actions, however, would introduce new short- to long-term, significant, adverse impacts from additional limitations on access due to public safety concerns from potential removal and/or detonation of UXO and other possible restoration activities. Continued long-term, moderate, beneficial impacts would result from continued cultural stewardship activities, provided the State adopts the Army’s cultural resources management commitments. 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.

#### **8.3.4 No Action Alternative**

Under the No Action Alternative, no State-owned land would be retained at MMR after expiration of the lease, and there would be no training on State-owned land. The No Action Alternative would result in similar impacts as Alternatives 2 and 3, Land Not Retained, with the highest level of short-term to long-term significant, adverse impacts from restoration activities; the complete removal of all UXO within the State-owned land, while not as extensive as the entire training area within Mākua Valley, may still involve extensive ground disturbance. As discussed with Alternatives 2 and 3, if restoration actions, such as the removal of UXO, were successfully achieved with minimal impact to cultural resources, long-term, significant, beneficial impacts would result with the removal of limitations on cultural access for Native Hawaiians and cultural practitioners into the foreseeable future. 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. Lastly, long-term, moderate, beneficial impacts would continue from cultural stewardship activities under the State.

## 9 MITIGATION

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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 areas.

### 9.1 EXISTING MITIGATION

The USAG-HI Cultural Resources program oversees cultural resources management at Army installations on O‘ahu, including KTA, Poamoho, and MMR. 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 and the Army requirements and procedures to protect cultural resources within the training areas.

Potential physical alteration on cultural resources from ongoing activities on State-owned lands have been considered through various Section 106 consultation processes. For example, ongoing activities within the KTA and Poamoho project areas are subject to provisions within the existing 2018 PA among USAG-HI, the Hawai‘i State Historic Preservation Office, and the Advisory Council on Historic Preservation (USAG-HI 2018a). 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 2018 PA also stipulates protocols for avoiding and minimizing physical impacts, such as the following (USAG-HI 2018a:9, 12):

- Marking boundaries of known historic properties with Seibert Stakes, which serve as physical markers of off-limit areas. Soldiers are provided with a Cultural Resources awareness brief, which educates soldiers on the use and meaning of Seibert Stakes.
- Installing signs to identify specific allowable or prohibited activities or to identify designated travel routes near historic properties.
- Erecting temporary or permanent high-visibility fencing around historic properties to prevent encroachment.
- Placing sandbags or other protective material around historic properties to prevent damage from UXO disposal activities.

Physical alteration on cultural resources from ongoing military activity on State-owned land at MMR has also been considered through the Section 106 process and is implemented through nine documents. These include (1) a Memorandum of Agreement (USAG-HI 2015) currently in place and expiring in

September 2025 that addresses vegetation management and the potential impacts on historic properties, specifically petroglyphs, at MMR; (2) six separate Section 106 consultation documents regarding potential adverse effects on historic properties from intelligence training (USAG-HI 2014a), blank-fire maneuver training (USAG-HI 2014b), bivouac training (USAG-HI 2014c), non-live-fire aviation training (USAG-HI 2014d), facility management (USAG-HI 2014e), road maintenance (USAG-HI 2014f), and the associated measures to avoid effects on historic properties, thus resulting in a finding of no adverse effects; (3) a PA (USAH 2000) for Traditional Hawaiian use of Ukanipō Heiau; and (4) a PA (USAG-HI 2009) for routine military training at MMR that was executed in 2009 and expired in 2014. Although formally expired, the 2009 PA (USAG-HI 2009) also implemented site protection measures that are still maintained at MMR.

Section 106 consultation documents for MMR implement additional avoidance and minimization efforts, such as limiting herbicide use and restricting vegetation management activities to the use of hand tools (e.g., sickles, grass hooks) in designated zones around sensitive historic properties (USAG-HI 2015:2–3).

The Army also provides access for NHOs and consulting parties for the KTA and Poamoho project areas via the 2018 PA (USAG-HI 2018a) and for the MMR project area via the 2000 Ukanipō Heiau PA (USAH 2000) and the 2001 Settlement Agreement and Stipulated Order, including appendices and modifications (Mālama Mākua v. Rumsfeld 2001a, 2001b, 2002; Mālama Mākua v. Gates 2008; Mālama Mākua v. Mattis 2018) (see Sections 7.1.1, 7.2.1, and 7.3.1).

The Army’s Integrated Cultural Resources Management Plan for O’ahu also describes guidelines pertaining to the management of cultural resources under the Army’s stewardship at KTA, Poamoho, and MMR, and lists their application to each of nine Standard Operating Procedures for managing cultural resources (USAG-HI 2018b).

## **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 D for a full summary of interviewee’s comments related to mitigation.

### **9.2.1 KTA Project Area**

The following mitigation recommendations were provided by interviewees for the KTA project area:

- Mr. Apo: “[T]here needs to be interaction and dialogue between the State and the Army.”
- Mr. Cáceres: “[A]reas that contain burial grounds should not be in the jurisdiction of the Army.” “Should the lease be renewed in 2029, sites with burials should be removed from their [Army] jurisdiction and Native Hawaiian Organizations should become the stewards of these resources.” “[A]

comprehensive inventory of cultural sites within the KTA project area should be undertaken.”

- Mr. Grace: “[M]inimizing the use of munitions and limiting the Army’s land use so that cultural resources are not impacted.” “[T]he Army work closely with kūpuna and cultural practitioners in the area on how best to use the land in the Kahuku area.”
- Mr. Hannahs: “[T]here needs to be a holistic framework that seeks to address how impacts in one area can impact other areas.” “[T]he Army also needs to know all the waterways, streams, and watersheds in order to mitigate impacts.”
- Mr. Hoe: “[M]itigate erosion.” “[T]here should be consultation with experts on environment, flora, and fauna.”
- Mr. Kajihiro: “[T]he community who are affected and most connected to these places should be the ones who determine access and proper use and should be involved in shaping a cultural use plan that incorporates revitalizing cultural practices and re-connecting people to the land.” “[N]o heavy equipment and training be allowed in the area.” “[A]ctions should be taken to restore the native forest, remove invasive plants, and allow Hawaiian community groups who have kuleana to this area to develop a cultural use plan that revitalizes their connection to the place.” “[T]he Army leverage youth and kūpuna in helping to transmit the thriving of knowledge so these ancient practices can continue.” Allow “community observers to observe military training activities and report irregularities or violations of existing agreements . . . commit to the removal of unexploded ordnance . . . [and] provide regular, safe, and meaningful cultural access to each of the sites” (Kajihiro 2021:22).
- Mr. Lenchanko: “[T]he military should give back the land” and “[a]ll of the leased properties should be returned to the State.” “Should the military retain their lease, . . . the people should be granted a perpetual easement that grants them access to the property to perform traditional practices and access cultural resources. This includes maintaining the land as a ka’ānani’au.” “[T]he military draft an inventory of all native species, plants, and cultural resources on their properties.”
- Mr. Oliveira: “[T]he Army should immediately stop the training in Kahuku” and “clean up the land and restore it.” “[T]he land should be returned to the people, not the State” and “put in trust for the Hawaiian people, through OHA or some other way.” “[T]he Army find a way to accommodate the people’s needs to access these lands beyond means of worship and cultural practices.”

### 9.2.2 Poamoho Project Area

The following mitigation recommendations were provided by interviewees for the Poamoho project area:

- Mr. Cáceres: “[I]t would be better if there was some kind of Native Hawaiian Organization that had jurisdiction over the stewardship of the land, and it was not just the Army managing the parcels and limiting access. This organization could ensure that the land was being cared for properly and practitioners and Hawaiians had access to these lands.”



- Mr. Grace: “[T]he project should not move forward without the guidance and direction of cultural practitioners in the area.”
- Mr. Hannahs: “[T]here needs to be a holistic framework that seeks to address how impacts in one area can impact other areas.” “[T]he Army also needs to know all the waterways, streams, and watersheds in order to mitigate impacts.”
- Mr. Hoe: No recommended mitigation and believes “the military has expended resources to protect the flora and fauna in the area.”
- Mr. Kajihiro: “[P]otential mitigation measures include restoring native forests and removing invasive species; opening the area for regular access; returning the land to the Hawaiians who have ancestral responsibilities to this land; and allowing those groups to begin the cultural revitalization of Poamoho.” “[T]he Army begin planning to restore and return the lands and allow the revival of cultural practices there.” “Should the Army retain the leased lands of Poamoho, . . . that the Army not control the access completely and there should be a Hawaiian community group in charge of planning activities for environmental and cultural restoration and revitalizing cultural practices to Poamoho.” “[T]he State has a specific kuleana under its trust obligations to the ‘āina, and that those specific obligations should drive the consideration process.”
- Mr. Lenchanko: “[T]he land retained by the Army be returned to the rightful claimants” and “the best option is for the military to return the land.” “[T]he land should be considered conservation land and would ideally go back into one of the Hawaiian trusts so that Native Hawaiians are able to protect and conserve it.” “If in 2029 the Army continues to retain their lease of Poamoho, . . . that perpetual access be granted to the people so they can utilize whatever part of the property they need.” “[T]he Army to do an assessment of the land they use for training that includes and recognizes a Hawaiian perspective on the cultural resources and traditions in the area and grants access to the people. This traditional cultural property analysis (TCP analysis) should be done in the Hawaiian cultural perspective.” “[T]he military draft an inventory of all native species, plants, and cultural resources on their properties.”
- Mr. Oliveira: “[T]he Army should immediately stop the training” and “clean up the land and restore it.” “[T]he land should be returned to the people, not the State” and “put in trust for the Hawaiian people, through OHA or some other way.” “[T]he Army find a way to accommodate the people’s needs to access these lands beyond means of worship and cultural practices.”

### 9.2.3 MMR Project Area

The following mitigation recommendations were provided by interviewees for the MMR project area:

- Mr. Ailā: “[T]he military should not continue to possess Mākua Valley and that it should be returned.” “[T]he money to remediate the valley should be put into an endowment for local non-profit organizations.” “[T]hat \$10 million per year (up to \$100 million) would be needed to remediate and restore Mākua Valley within 50 years” and “the recovery plan includes hiring and training

local people to manage the restoration, and also includes an education component.” “[D]oes not agree with allowing the Army to remediate the land.”

- Mr. Apo: “[R]eview compensation associated with Mākua, including 1. Negotiating a realistic lease; 2. Maintaining a high level of stewardship; and 3. Supporting the Army in retaining the land for the training site.” “[H]igh-level dialogue must commence regarding the land retention by the Army.” “[G]ood idea if the new lease included a provision to bring back native plants that used to be there.” “[C]ultural access to the valley is important.” “Mākua should not be returned to the State.” “[T]hese lands should not/cannot be returned due to the potential dangers posed by possible explosives materials.” “[T]he military continue its priority to care for and maintain the “wahi pana.””
- Mr. Cáceres: “[T]he military needs to do a better job at cleaning up the remaining munitions in the area.” “[T]he only way to mitigate the impacts is to not renew the military’s lease and for the military to give more attention to their efforts to clean up and restore the valley.” “[I]f the military’s lease is renewed in 2029, . . . one of the conditions should be that no training occurs in the valley and the military’s efforts are strictly geared towards clean up and providing access for the community.”
- Mr. Enos: “[T]he community should be made aware of any new plans the military has for Mākua, including what kind of new training they might be using the valley for, should they retain the land.” “[D]oes not feel that the military should retain the land at Mākua.” “[T]he military has the responsibility to clean up the valley and fully restore it.” “[T]he military should have a part in the conservation and protection of Mākua once their lease ends” and “that the environmental and conservation arm of the military could continue to play a role in the conservation and restoration of Mākua.” “Certain things which already exist in Mākua from the military, like fencing, can be utilized by the community once they leave.”
- Mr. Grace: “[T]he Army work closely with kūpuna and cultural practitioners in the area on how best to use the land in Mākua and how to mālama ‘āina.”
- Mr. Hannahs: “[M]itigating negative impacts is important” and “negative impacts could include noise, chemical residue, bombing, live-fire training, etc.” “[S]hould the military retain the land, the military should view the relationship to the land and community holistically.” “Mākua is managed to optimize its role in support of vital ecosystem services.”
- Mr. Hoe: “[T]he military clean up the land from previous live-fire trainings.”
- Mr. Kajihiro: “[I]n preparation for the expiration of the lease in 2029, the land should be cleaned up to the condition prior to the military occupation of the valley and then returned to the people of Mākua.” “[C]lean up should be financed by the military but led by the community.” “[D]oes not recommend the Army retain the land past 2029; instead, . . . Mākua should be used as a center for cultural practice and learning and as a living laboratory for environmental restoration.”

- Mr. Lenchanko: “[T]he military has no place in Mākua and that the land should be returned.” “[C]ultural practitioners and Mākua families should be given back perpetual access to their land.” “[T]he military draft an inventory of all native species, plants, and cultural resources on their properties.”
- Mr. Oliveira: “[T]he military needs to clean up the valley to mitigate the risk of remaining explosives.” “[T]he valley should be returned to the people to care for and protect.” “[R]estore it as best as they [Army] can and return it back to the people.” “[T]he military should start to clean up the land now so that in 2029 they can return it to the Hawaiian people.” “[T]he land should be returned to the people, not the State” and “put in trust for the Hawaiian people, through OHA or some other way.” “[T]he Army find a way to accommodate the people’s needs to access these lands beyond means of worship and cultural practices.”

#### **9.2.4 Discussion**

Overarching mitigation themes expressed by interviewees’ recommendations center around cultural access; caring for, restoring, and promoting better stewardship of the land; consulting with cultural practitioners; and conducting culturally sensitive inventory surveys to thoroughly record cultural resources within each project area.

The Army currently engages in many of these mitigation strategies such as providing cultural access (which is also included in the State’s public access policies, see Chapter 7), maintaining cultural resource sites (see Section 9.1), consulting with NHOs and other parties (see Section 9.1), and conducting cultural resources inventory surveys. The focus that interviewees placed on these issues may stem from several factors, including their perception over the nature and extent to which these mitigation strategies are implemented by the Army as well as the need for a more effective outreach campaign to ensure NHOs and other cultural practitioners are aware of access opportunities.

### **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 include, 1) working with cultural practitioners to update and/or develop a mutually beneficial cultural access plan that facilitates safe engagement with cultural resources, practices, and beliefs within each project area, 2) promoting better long-term stewardship of the ‘āina with regard to military use of the land, and 3) reviewing and updating the Army’s public education campaign to ensure the various access programs are known and understood by the community.

## 10 CONCLUSION

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This CIA has presented ethnographic research from archival and contemporary resources relevant to the KTA, Poamoho, and MMR project areas to make a good faith effort to identify cultural beliefs, practices, and resources of Native Hawaiians and other ethnic groups associated with the project areas 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 areas and the broad geographical areas. The most impacts to cultural resources from the Proposed Action and the continuation of ongoing military activity, as reflected in interviews, are for the MMR project area. Paramount among these is access to the MMR project area (excluding portions of the Makai Tract that already have unlimited public access). Although current access policies exist for the areas with limited access, they are deemed inadequate by interviewees who desire safe, unlimited, and regular access to the entire MMR 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 large parts of the MMR project area, this is due to public safety concerns. The continuation of current military activity within portions of the MMR 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 per current and existing access agreements, but current limitations on access are likely to continue into the foreseeable future.

Additionally, adverse impacts would continue within the MMR 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 Mākua Valley itself, including the project area, is a sacred setting, which is altered by the presence of military activity, and in particular, by debris (e.g., UXO) left by prior military activity that continues to adversely impact the landscape despite the suspension of live-fire training.

Other impacts discussed by interviewees for all project areas, such as physical alteration on cultural resources, are associated with past actions within each project area and are currently mitigated by existing agreements, including the 2018 PA (USAG-HI 2018a) for the KTA and Poamoho project areas and, for the MMR project area, the 2015 Memorandum of Agreement that addresses vegetation management and the potential impacts on historic properties (USAG-HI 2015), six separate Section 106 consultation

documents regarding potential adverse effects on historic properties (USAG-HI 2014a, 2014b, 2014c, 2014d, 2014e, 2014f), the Ukanipō Heiau 2000 PA (USAH 2000), and the 2009 PA for routine military training (USAG-HI 2009) (see Section 9.1).

Recommendations identified by interviewees to avoid, minimize, rectify, or reduce potential impacts from the Proposed Action include working with cultural practitioners to develop a mutually beneficial access plan that promotes engagement with cultural resources, practices, and beliefs within the project area, as well as promoting better long-term stewardship of the ‘āina with regard to military use of the land.

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## GLOSSARY

Definitions from the *Hawaiian Dictionary* (Pukui and Elbert 1986).

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‘ahi	<i>Thunnus albacares</i> , Hawaiian yellow-fin tuna. An important fish in the Honolulu market.
āhole	<i>Kuhlia sandivicensis</i> , Hawaiian flagtail. An endemic fish found in both fresh and salt water. The mature stage is āhole, the young stage āholehole.
āholehole	Young stage of the āhole, Hawaiian flagtail.
ahupua‘a	Land division usually extending from the uplands to the sea, so called because the boundary was marked by a heap (ahu) of stones surmounted by an image of a pig (pua‘a), or because a pig or other tribute was laid on the altar as a tax to the chief.
‘āina	Land, earth.
akua	God, goddess, spirit, ghost, devil, image, idol, corpse; divine, supernatural, godly.
akule	<i>Selar crumenophthalmus</i> , big-eye scad. Also called goggle-eyed scad fish. Stages of growth are pā‘ā‘ā, halalū or hahalalū, and akule.
ala; ala hele	Path, road, trail.
‘alamihi	<i>Metopograpsus thukuhar</i> , a common black crab.
ali‘i	Chief, chiefess, officer, ruler, monarch, peer, headman, noble, aristocrat, king, queen, commander; royal, regal, aristocratic, kingly.
ao	World, earth, realm.
‘aoa	Same as ‘iliahi, sandalwood [ <i>Santalum</i> spp.].
‘āpana	Piece, slice, portion, fragment, section, segment, installment, part, land parcel, lot, district, sector, ward, precinct.
‘aumakua	Family or personal deity, deified ancestors who might assume the shape of sharks (all islands except Kaua‘i), owls (as at Mānoa, O‘ahu and Ka‘ū and Puna, Hawai‘i), hawks (Hawai‘i), ‘elepaio, ‘iwi, mudhens, octopuses, eels, mice, rats, dogs, caterpillars, rocks, cowries, clouds or plants. ‘Aumākua, plural of ‘aumakua.
‘aumoana	To travel to the open sea; sailor.
‘aweoweo	<i>Priacanthus meeki</i> , Hawaiian bigeye. Also called red fishes. Young are called ‘alalauā and ‘alauwā.
‘elepaio	<i>Chasiempis ibidis</i> , O‘ahu monarch flycatcher. A species of flycatcher with subspecies on Hawai‘i ( <i>Chasiempis sandwichensis</i> ), Kaua‘i ( <i>C. sclateri</i> ), and O‘ahu ( <i>C. ibidis</i> ).
eluehe	<i>Osteomeles anthyllidifolia</i> , Hawaiian hawthorn. A Moloka‘i name for ‘ūlei, a shrub.



hala	<i>Pandanus tectorius</i> , screw pine. The pandanus or screw pine, native from southern Asia east to Hawai‘i, growing at low altitudes, both cultivated and wild. It is a tree with many branches, which are tipped with spiral tufts of long narrow, spine-edged leaves; its base is supported by a clump of slanting aerial roots. The pineapple-shaped fruits are borne on female trees whereas the spikes of fragrant, pollen-bearing flowers are borne separately on male trees.
heiau	Pre-Christian place of worship; shrine; some heiau were elaborately constructed stone platforms, others simple earth terraces
hele mauna	To travel in the mountains; mountain climber.
huaka‘i	Trip, voyage, journey, mission, processions, parade.
hula	The hula, a hula dancer; to dance the hula.
‘iewe	Afterbirth, placenta. Also ēwe.
‘ike ku‘una	Traditional knowledge.
‘ili	Land section, next in importance to ahupua‘a and usually a subdivision of an ahupua‘a.
‘iliahi	<i>Santalum</i> spp., sandalwood. All Hawaiian kinds of sandalwood, shrubs and trees, with fragrant heart wood, small pale-green or gray-green leaves, small, dull-red or greenish flowers, and small purple fruits. Also ‘aoa.
imu	Underground oven; food cooked in an imu. Also umu.
‘ina	<i>Echinometra</i> spp., small sea urchin (wana).
inoa ‘āina	Place names.
ipu	<i>Lagenaria siceraria</i> , bottle gourd. Also <i>L. vulgaris</i> , a wide-spreading vine, with a large-angled or lobed leaves, white, night-blooming flowers, and smooth green and mottled or white fruits varying widely in shape and size. The plant is native of tropical Asia or Africa.
iwi kūpuna	The bones of the ancestors.
ka‘ahele	To make a tour, travel about; a tour; in turns.
ka‘ānani‘au	Same as ahupua‘a, the altar marking the land division.
ka‘apuni	To make a turn, go around, surround, encircle, rotate, revolve, travel; circuit.
kāhuna	(plural of kahuna) Priest, sorcerer, magician, wizard, minister, expert in any profession (whether male or female); in the 1845 laws doctors, surgeons, and dentists were called kahuna.
kalana	Division of land smaller than a moku or district; county.

kalo	<i>Colocasia esculenta</i> , taro. A kind of aroid cultivated since ancient times for food, spreading widely from the tropics of the Old World. In Hawai'i, taro has been the staple from earliest times to the present, and here its culture developed greatly, including more than 300 forms. All parts of the plant are eaten, its starchy root principally as poi, and its leaves as lū'au. It is a perennial herb consisting of a cluster of long-stemmed, heart-shaped leaves rising 30 cm. or more from underground tubers or corms.
kama'āina	Native-born, one born in a place, host; native plant; acquainted, familiar. <i>Lit.</i> , land child.
Kānaka 'Ōiwi	Native Hawaiians.
kapa	Tapu, as made from wauke or māmaki bark; formerly clothes of any kind or bedclothes.
kauila; kauwila	<i>Alphitonia ponderosa</i> , dark spear wood. A native tree in the buckthorn family ( <i>Alphitonia ponderosa</i> ), found on the six main Hawaiian islands, with alternating leaves, oblong to narrow and woolly below, its hard wood was used for spears and mallets.
keiki	Child, offspring, descendant, progeny, boy, youngster, son, lad, nephew, son of a dear friend.
kī	<i>Cordyline terminalis</i> , ti. A woody plant in the lily family, native to tropical Asia and Australia. It consists of a branched or unbranched, slender, ringed stem, ending in a cluster of narrow-oblong leaves 30 to 60 cm long, from among which at times rises a large panicle of small, light-colored flowers.
kia'i	Guard, watchman, caretaker.
kiawe	<i>Prosopis pallida</i> , algaroba tree. A legume from Peru, first planted in 1828 in Hawai'i, where, in dry areas, it has become one of the commonest and most useful trees.
kilo	Stargazer, reader of omens, seer, astrologer, necromancer; kind of looking glass (rare); to watch closely, spy, examine, look around, observe, forecast.
kinolau	Many forms taken by a supernatural body, as Pele, who could at will become a flame of fire, a young girl, or an old hag.
kō	<i>Saccharum officinarum</i> , sugarcane. A large unbranched grass brought to Hawai'i by early Polynesians as a source of sugar and fiber. The thick stems are full of sweet juicy pulp. In time, many different kinds of cane were produced, with many different attributes and names.
koa	<i>Acacia koa</i> ; the largest of native forest trees, with light-gray bark, crescent-shaped leaves, and white flowers in small, round heads. A legume with fine, red wood, a valuable lumber tree, formerly used for canoes, surfboards, calabashes, now for furniture and ukuleles.
ko'a	Shrine, often consisting of circular piles of coral or stone, built along the shore or by ponds or streams, used in ceremonies as to make fish multiply; also built on bird islands, and used in ceremonies to make birds multiply.

konohiki	Headman of an ahupua‘a land division under the chief; land or fishing rights under control of the konohiki; such rights are sometimes called konohiki rights.
kuahine	Term of address for a male’s sister or female cousin, sometimes replacing the more common kaikuahine.
kuahu	Altar.
kukui	<i>Aleurites moluccana</i> , candlenut tree. A large tree in the spurge family bearing nuts containing white, oily kernels which were formally used for lights; hence, the tree is a symbol of enlightenment. The nuts are still cooked for relish (‘inamona). The soft wood was used for canoes, and gum from the bark for painting tapa; black dye was obtained from nut coats and from roots.
kula	Plain, field, open country, pasture. An act of 1884 distinguished dry or kula land from wet or taro land.
kuleana	Right, privilege, concern, responsibility, title, business, property, estate, portion, jurisdiction, authority, liability, interest, claim, ownership, tenure, affair, province; reason, cause, function, justification; small piece of property, as within an ahupua‘a.
kūmū	<i>Parupeneus porphyreus</i> , goatfish. The stages of growth are kolokolopā, ‘āhuluhulu, kūmū a‘e, and the adult kūmū.
kumulipo	Origin, genesis, source of life, mystery; name of the Hawaiian creation chant.
kūpe‘e	<i>Nerita polita</i> , an edible marine shell. The shells were used for ornaments, the rare ones by chiefs.
kūpuna	Grandparent, ancestor, relative or close friend of the grandparent’s generation, grandaunt, granduncle. Plural of kupuna.
lā‘au kahi wauke	Wooden scraping board.
lā‘au lapa‘au	Medicine. <i>Lit.</i> , curing medicine.
lama	<i>Diospyros sandwicensis</i> , ebony. All endemic kinds of ebony ( <i>Diospyros</i> , synonym <i>Maba</i> ), hardwood trees with small flowers and fruits. Also ēlama.
lei wili	A lei that is not strung (kui): the leaves or flowers are entwined about each other, as maile leis.
lele	Sacrificial altar or stand.
limu	Seaweed; a general name for all kinds of plants living under water, both fresh and salt, also algae growing in any damp place in the air, as on the ground, on rocks, and on other plants; also mosses, liverworts, lichens.
lo‘i	Irrigated terrace, especially for taro, but also for rice; paddy.

loko wai	Fresh-water pond or lake; fountain.
lole	Cloth, clothes, costume, dress, gown; to wear clothes.
loulou	<i>Pritchardia</i> spp., native fan palm. Hats are plaited of its leaves bleached white. Also noulu.
Māhele ʻĀina	Land Division of 1848.
mahiʻai	Farmer, planter; to farm, cultivate; agricultural.
maiʻa	<i>Musa x paradisiacal</i> , banana. All kinds of bananas and plantains. Originally, the banana was introduced by the Hawaiians, and native varieties were developed, some of which are still used.
maile	<i>Alyxia stellata</i> ; a native twining shrub, also known as <i>Alyxia olivaeformis</i> .
maile lau liʻi	A variety of maile, with narrow pointed leaves. <i>Lit.</i> , small-leaved maile.
makahiki	Ancient festival beginning about the middle of October and lasting about four months, with sports and religious festivities and taboo on war.
makai	On the seaside, toward the sea, in the direction of the sea.
makua	Parent, any relative of the parents' generation, as uncle, aunt, cousin; progenitor.
mālama ʻāina	Caring for the land.
manaʻo	Thought, idea, belief, opinion, theory, thesis, intention, meaning, suggestion, mind, desire, want; to think, estimate, anticipate, expect (see ex., leleʻoi), suppose, mediate, deem, consider (not the intellectual process of noʻonoʻo).
manini	<i>Acanthurus triostegus</i> , very common reed surgeonfish. Also called convict tang, in the adult stage. In legends manini ʻele kuhō. For younger stages see ʻōhualiko, ōkua kāniʻo, palapōhaku, kākala manini, maninini.
manu	Bird, any winged creature; wing of a kite. <i>Fig.</i> , person.
mauka	Inland, upland, towards the mountain, shoreward (if at sea).
mele	Song, anthem, or chant of any kind; poem, poetry; to sing, chant (preceded both ke and ka).
mele koʻihonua	genealogical chants describing the formation of the earth.
moa	<i>Gallus gallus</i> , chicken. Red jungle chicken, fowl, as brought to Hawaiʻi by Polynesians; for some people, an ʻaumakua.
moho	<i>Pennula sandwichensis</i> , Hawaiian rail. An extinct flightless bird.

moi	<i>Polydactylus sexfilis</i> , Pacific threadfish. Stages of growth: moi li'i, little moi, 5 to 8 cm long; pālāmoi (Kaua'i) or manamoi (Hawai'i), about 13 cm; moi, adult, 45 to about 97 cm. On Hawai'i, the pālāmoi was about 30 cm. This fish was much esteemed for food. A large school was an omen of disaster for chiefs.
moku	District, island, islet, section.
mokuna	Division, boundary, border, as of land.
mo'o	Lizard, reptile of any kind, dragon, serpent; water spirit.
mo'o akua	Legend or tale concerning the gods; god-like lizard.
mo'olelo	Story, tale, myth, history, tradition, literature, legend, journal, log, yarn, fable, essay, chronicle, record, article.
mūhe'e	<i>Sepioteuthus arctipinnis</i> , cuttlefish.
nenue, nenuwe	<i>Kyphosus hawaiiensis</i> , Hawaiian chub fish. Also known as rudder or pilot fish. Also nanue, enenue, manaloa.
niu	<i>Cocos nucifera</i> , coconut. A common palm in tropical islands of the Pacific and warm parts of eastern Asia; coconut meat or oil. Hawaiians used all parts of the tree.
noho	To live, reside, inhabit, occupy (as land), dwell, stay, tarry, marry, sit, be in session.
'oama, 'owama	Young of the weke (Mullidae), goatfish.
'ohe	<i>Schizostachyum glaucifolium</i> , native bamboo, Polynesian bamboo.
'ōhi'a 'ai	<i>Syzygium malaccense</i> , mountain apple. A forest tree to 15 m high, found on many islands of the Pacific. It belongs to the myrtle family, has large oval leaves, tufted flowers growing from trunk and branches, and cerise, apple-like fruits. Formerly Hawaiians prepared the fruit, splitting and drying it in the sun.
'ōhi'a lehua	<i>Metrosideros polymorpha</i> . The flower of the 'ōhi'a tree; also the tree itself. . . The plant has many forms, from tall trees to low shrubs, leaves round to narrow and blunt or pointed and smooth or woolly. The flowers are red, rarely salmon, pink, yellow, or white. The wood is hard, good for flooring and furniture, formerly used for images, spears, mallets.
'ō'io	<i>Albula virgata</i> , Hawaiian bonefish. Stages of growth are: pua 'ō'io, finger length; 'āmo'omo'o, forearm length; 'ō'io, adult, 60 to 90 cm long. See ex., halalē.
o'io'ina	Resting place for travelers, such as a shady tree, rock; to rest.
'ōlena	<i>Curcuma domestica</i> , turmeric. A kind of ginger distributed from India into Polynesia, widely used as a spice and dye in foods, to color cloth and tapa, and medicinally for

earache and lung trouble. A cluster of large leaves rises from thick, yellow underground stems, which are the useful part of the plant, either raw or cooked.

oli	Chant that was not danced to, especially with prolonged phrases chanted in one breath, often with a trill ('i'i) at the end of each phrase; to chant thus.
'ōlohe	Skilled, especially in lua fighting, so called perhaps because the beards of lua fighters were plucked and their bodies greased.
'o'opu	Gobiidae, freshwater goby. Some are in salt water near the shore, others in fresh water, and some said to be in either fresh or salt water.
'ōpae	<i>Halocaridina rubra</i> , red shrimp. For some persons, 'ōpae were 'aumakua.
'ōpelu	<i>Decapterus macarellus</i> , mackerel scad. Also <i>D. maruadsi</i> ; an 'aumakua for some people.
pia	<i>Tacca leontopetaloides</i> , Polynesian arrowroot. An herb known in the eastern tropics, formerly cultivated in Hawai'i for the starchy tubers, which were used for medicine and food. In spring or summer, a few leaves rise on long stems from a tuber and die back in the winter. The blades are much divided, about 30 cm wide, somewhat like papaya leaves in shape.
pili	<i>Heteropogon contortus</i> , tanglehead, twisted beardgrass, pili grass. A grass known in many warm regions, formerly used for thatching houses in Hawai'i; sometimes added to the hula altar to Laka, for knowledge to pili or cling; thatch (preceded by ke).
pō	Night, darkness, obscurity; the realm of the gods; pertaining to or of the gods, chaos, or hell.
pōhaku	Rock, stone, mineral, tablet.
poi	Hawaiian staff of life, made from cooked taro corms, or rarely breadfruit, pounded and thinned with water.
pono	Goodness, uprightness, morality, moral qualities, correct or proper procedure, excellence, well-being, prosperity, welfare, benefit, behalf, equity, sake, true condition or nature, duty; moral, fitting, proper, righteous, right, upright, just, virtuous, fair, beneficial, successful, in perfect order, accurate, correct, eased, relieved; should, ought, must, necessary.
pua'a	Pig, hog, swine, pork.
pule	Prayer, magic spell, incantation, blessing, grace, church service, church; to pray, worship, say grace, ask a blessing, cast a spell.
pu'u	Hill, peak, cone, hump, mound, bulge, heap, pile.
pu'uhonua	Place of refuge, sanctuary, asylum, place of peace and safety.

- ‘uala, ‘uwala *Ipomoea batatas*, sweet potato. A perennial, wide-spreading vine, with heart-shaped, angled, or lobed leaves and pinkish-lavender flowers. The tuberous roots are a valuable food, and they vary greatly in many ways, as in color and shape. Though of South American origin, the plant has been a staple food since ancient times in many parts of Polynesia, as well as in some other regions.
- uhau humu pōhaku (the practice of) dry-stone stacking.
- uhu *Scarus perspicillatus*, parrotfish. Uhu are plant eaters, the teeth are strong and beaklike, well fitted for clipping off food from coral. Names of growth stages are ‘ōhua (very young), pānuhu or pōnuhunuhu (medium), and uhu (mature). Variant names are male and ‘ōmale for a young stage.
- ‘ūlei *Osteomeles anthyllidifolia*, Hawaiian hawthorn. A native spreading shrub, closely allied to other species found on some other islands of the Pacific. It has compound leaves, small white roselike flowers, small round white fruits. The wood is tough and formerly was used for digging sticks, fish spears, and the ‘ūkēkē (musical bow).
- ‘ulu *Artocarpus altilis*, breadfruit. A tree perhaps originating in Malaysia and distributed through tropical Asia and Polynesia. It belongs to the fig family, and is grown for its edible fruits, sometimes for ornament. The leaves are large, oblong, more or less lobed; fruits are round or oblong, weighing up to 4.5 kilos, when cooked tasting something like sweet potatoes.
- uluhe *Dicranopteris linearis*, false staghorn fern. Weedy, creeping, branching ferns, forming dense thickets. Also unuhe.
- ‘ulu maika Stone used in maika game; to play the ‘ulu maika game; bowling, bowling ball.
- ‘umeke lā‘au Wooden bowl.
- wahi Place, location, position, site, setting.
- wai water, liquid, or liquor of any kind other than sea water (see ex., koni), juice, sap, honey.
- wana A sea urchin, as *Diadema paucispinum* and *Echinothrix diadema*, considered by some an ‘aumakua.
- wauke *Broussonetia papyrifera*, paper mulberry. A small tree or shrub, from eastern Asia, known throughout the Pacific for its usefulness. It belongs to the fig or mulberry family. The bark was made into tough tapa used for clothing, bed clothes; it lasted longer than māmaki tapa.
- weke Certain species of the Mullidae, surmullets or goatfish. All weke have large scales and are usually found in reefs, sometimes in deep water. Both red and light-colored weke were popular as offerings to the gods to turn away curses.

**APPENDIX A: INDIVIDUALS AND ORGANIZATIONS CONTACTED**



**Table A-1. List of Individuals Contacted (Names Provided by USAG-HI, dated March 23, 2022)**

FIRST NAME	LAST NAME	PROJECT AREA ASSOCIATION	COMMENTS
William J.	Ailā	MMR	Interviewed July 6, 2022.
Peter	Apo	KTA, MMR	Interviewed June 15, 2022.
(Norman) Mana Kaleilani	Cáceres	KTA, Poamoho, MMR	Interviewed June 13, 2022.
Lynette	Cruz	MMR	Emailed June 6, 2022. Agreed to interview and referred others but did not respond to further scheduling request on June 13, 2022.
Chris	Dawson	KTA, Poamoho, MMR	Emailed June 8, 2022. No response.
Clarence Ha’o	DeLude	KTA, Poamoho, MMR	Emailed June 8, 2022. No response.
Noelani	DeVincent	KTA, Poamoho	Emailed. Initially agreed to interview then decided not to participate.
Vince Kana’i	Dodge	MMR	Emailed June 9, 2022. No response.
Eric	Enos	MMR	Interviewed June 12, 2022.
Hailama	Farden	KTA, Poamoho, MMR	Emailed June 9, 2022. No response.
(Nathan) Keola	Grace	KTA, Poamoho, MMR	Interviewed May 11, 2022.
Ha’aheo	Guanson	KTA, Poamoho, MMR	Emailed June 8, 2022. No response.
Neil J.K.	Hannahs	KTA, Poamoho, MMR	Interviewed June 20, 2022.
Justin	Hill	MMR	Emailed June 8, 2022. No response.
Allen	Hoe	KTA, Poamoho, MMR	Interviewed June 14, 2022.
William Aweau	Ho’ohuli	KTA, Poamoho, MMR	Emailed June 9, 2022. No response.
Sylvia	Hussey	KTA, Poamoho, MMR	Declined interview.
Ronald	Jarrett	KTA, Poamoho, MMR	Emailed June 9, 2022. No response.
Jason	Jeremiah	KTA, Poamoho, MMR	Emailed June 9, 2022. No response.
William	Kaina	KTA, Poamoho, MMR	Emailed June 9, 2022. No response.
Kyle	Kajihiro	KTA, Poamoho, MMR	Interviewed June 15, 2022. Submitted letter August 31, 2021 (O’ahu ATR EIS scoping comments).
Shad	Kane	KTA, Poamoho, MMR	Emailed June 5, 2022. No response.
Charles William Kahana	Kapua	KTA, Poamoho, MMR	Emailed June 9, 2022. No response.

FIRST NAME	LAST NAME	PROJECT AREA ASSOCIATION	COMMENTS
Kimball	Kaopio	MMR	Email returned as undeliverable.
Kepo'o	Keli'ipa'akaua	KTA, Poamoho, MMR	Emailed June 8, 2022. No response.
Emalia	Keohokalole	KTA, Poamoho, MMR	Emailed June 9, 2022. No response.
Glen Makakauli'i	Kila	KTA, Poamoho, MMR	Emailed June 5, 2022. No response.
Lani Ma'a	Lapilio	KTA, Poamoho, MMR	Emailed June 8, 2022. Declined interview
Antoinette	Lee	KTA, Poamoho, MMR	Emailed June 9, 2022. No response.
Thomas	Lenchanko	KTA, Poamoho, MMR	Interviewed May 10, 2022.
Keona	Mark	KTA, Poamoho, MMR	Emailed June 8, 2022. No response.
Rocky	Naeole	KTA, Poamoho, MMR	Emailed June 9, 2022. No response.
Carolyn Keala	Norman	Poamoho	Emailed June 8, 2022. Declined interview, referred Tommy Shirai.
Christophor Edward	Oliveira	KTA, Poamoho, MMR	Interviewed June 5, 2022.
Maria	Orr	KTA, Poamoho, MMR	Emailed June 8, 2022. Declined interview.
Kaleo	Paik	KTA, Poamoho, MMR	Emailed June 8, 2022. No response.
Benton Kealii	Pang	KTA, Poamoho, MMR	Emailed June 8, 2022. No response.
Kahu Kaleo	Patterson	KTA, Poamoho, MMR	Emailed June 5, 2022. No response.
Leimaile	Quitevis	KTA, Poamoho, MMR	Emailed June 5, 2022. No response.
William	Richards	KTA, Poamoho, MMR	Emailed June 9, 2022. No response.
Sparky	Rodrigues	MMR	Emailed June 9, 2022. No response.
Kēhaulani	Souza	KTA, Poamoho, MMR	Emailed June 8, 2022. No response.
Mililani B.	Trask	KTA, Poamoho, MMR	Emailed June 12, 2022. Declined interview, recommended others to be interviewed.
Harry	Wasson	KTA, Poamoho, MMR	Emailed June 5, 2022. No response.
JR Keonekapu	Williams	MMR	Emailed June 5, 2022. No response.

## **APPENDIX B: ONLINE SURVEY QUESTIONS AND RESPONSES**

Honua Consulting, LLC (Honua) conducted an online survey to ensure as many individuals as possible were given the opportunity to participate in the ethnographic scoping process for the Cultural Impact Assessment (CIA) for Army Training Land Retention of State Lands in Kahuku Training Area, Kawaiiloa-Poamoho Training Area, and Makua Military Reservation, Island of O‘ahu, Hawai‘i. The survey proved valuable when the COVID-19 pandemic resulted in emergency orders limiting travel and person-to-person contact.

To avoid the inadvertent exclusion of individuals wishing to participate in the CIA, Honua employed two methods to inform the public about the online survey. First, a public notice was placed in *Ka Wai Ola*, a newspaper published by the Office of Hawaiian Affairs, along with a link to the survey. Second, Honua posted a notice and a link to the survey on their Facebook and Instagram accounts to attempt to reach an even broader segment of the population. Honua created the survey in September 2021 and made it publicly available starting November 1, 2021. At the time of this writing, the survey remains open and available to any member of the public.

Responses, excluding personal identifiable information, to all survey questions for each project area are provided in this appendix. Percentages are based on the combined total number of responses and skipped responses for each question.

## **KAHUKU TRAINING AREA (KTA)**

**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 6,300 acres of State-owned land on O‘ahu. 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.*
  - “Yes” responses (n=25, 93%)
- **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.*
  - Skipped responses (n=2, 7%)

The responses from those who marked that they did not want to be a participant were excluded from the report.

**Question 2:** *Please provide your name.*

- Responses (n=7, 26%)
- Skipped responses (n=20, 74%)

**Question 3:** *What is your current profession?*

- Responses (n=6, 22%)
- Skipped responses (n=21, 78%)

**Question 4:** *Where do you live now?*

- Responses (n=7, 26%)
- Skipped responses (n=20, 74%)

**Question 5:** *Where were you born and raised?*

- Responses (n=7, 26%)
- Skipped responses (n=20, 74%)

**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.*

- Responses (n=6, 22%)
- Skipped responses (n=21, 78%)

**Question 7:** *What is your association, if any, with the Project Area?*

- Responses (n=7, 26%):
  - *Resident nearby*
  - *I work in Kahuku.*
  - *None*
  - *Historical Traditional Protocols*
  - *None*
  - *None*
  - *It is Native Hawaiian Lands*
- Skipped responses (n=20, 74%)

**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?*

- Responses (n=7, 26%):
  - *Yes*

- *If we had the opportunity to celebrate Makahiki in the Project area we could, other traditions is the burying of ewe and according to a kūpuna that secretly shared this with me, the area was known for women to gather to pray to Lewa for female and motherly issues.*
- *No*
- *Yes... When it comes to Genealogy, and Burial Iwi NA KUPUNA KAHIKO*
- *No*
- *No*
- *Of course! All mountain/forest areas in Hawaii, therefore the aforementioned project areas are sacred! Not to mention the endemic/native plants/birds/insects etc that will be irreparably harmed/destroyed*
- Skipped responses (n=20, 74%)

**Question 9:** *What place names do you know for the Project Area or areas near or adjacent to the Project Area?*

- Responses (n=6, 22%):
  - *Kahuku Moto Cross track*
  - *Names near the area is Keana where the high school and police station sites towards the mauka area. Kahuku point is where Kaleohipa & Nāwaiulawe. And there is a secret where a magical Hawaiian moorhen lives.*
  - *Koolau*
  - *In KAHUKU... PUPUKEA AND PAUMALU HEIAU in MAKUA...MAKUA CAVE AND MAKAHA HEIAU (HALE MANA)*
  - *Kahuku*
  - *None*
- Skipped responses (n=21, 78%)

**Question 10:** *Are you aware of any cultural resources in the Project Area or near the Project Area? If so, please list them below.*

- Responses (n=6, 22%):
  - *Depends on what you mean by cultural resources. There many stories and right now on a clear night you can see Makali'i Pleiades in alignment with the area signifying the many Māui stories, Hi'iaka stories and connects with navigation. If we were to revitalize an ahu or altar in the area, it could signify and recognize the coming back of native birds and resurrect Native plants.*
  - *No*
  - *WAIMEA VALLEY.... KUKANILOKO MAKUA VALLEY... OPENING UP OUR VALLEY STREAMS AS WAS .... FLOWING FREELY*
  - *No*
  - *No*

- *Native Hawaiian gathering rights*
- Skipped responses (n=21, 78%)

**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.*

- Responses (n=4, 15%):
  - *The North Shore of Oahu is treasured by all Hawaiians. It was one of the first settlements in Hawaii and today is the second largest tourist attraction on Oahu, second to Pearl Harbor.*
  - *The project area needs Koa trees, iliahi, or plants that once thrived there. If we bring back the Native bat population that could help control the insects.*
  - *No*
  - *ALL IWI BURIALS and HISTORICAL HEIUA*
- Skipped responses (n=23, 85%)

**Question 12:** *Are there any stories associated with the Project Area we should be aware of? If so, please share that information below.*

- Responses (n=6, 22%):
  - *There are a number of Hi'iaka stories passed down, Kaalaehuapi the sacred mud hen lives in one of those caves, there may be iwi in the area according to McAllister "Archaeology of Hawaii."*
  - *No*
  - *In these Sacred Island Caves and VALLEYS AHUPUAA IS NIGHT MARCHERS TO PROTECT OUR LANDS FROM ILLEGAL DISRESPECTFUL INVADERS... INTRUDERS... And MILITARY TRESPASSERS... Without Proper PERMITS IS A CONCERN*
  - *No*
  - *No*
  - *Of course! All areas are associated with stories/mele*
- Skipped responses (n=21, 78%)

**Question 13:** *The Department of the Army is proposing retention of up to approximately 1,170 acres of State-owned land at the Kahuku Training Area. TMKs (1) 5-8-002:002 and (1) 5-9-006:026 in the ahupua'a of Paumalū, Waiale'e, and Pahipahiālua in the moku of Ko'olaupoko on the Island of O'ahu. Are you aware of any resources that may be impacted by such a project? What might those impacts be?*

- Responses (n=7, 26%):
  - *Surfing and the pristine ocean that supports it.*
  - *The sacred wahi pana may be impacted, Makahiki games and traditions would be impacted.*

- No
- *OUR BURIAL GROUNDS OF OUR ANCESTORS.... FEDERAL STATE AND COUNTY OF OAHU HAS NOT RESPECTED AND OR RECOGNIZED OUR IWI NA KUPUNA KAHIKO*
- No
- No
- *Numerous endemic/native plants/birds/insects.*
- Skipped responses (n=20, 74%)

**Question 14:** *Can you think of ways in which any potential impacts can be minimized, mitigated, or avoided?*

- Responses (n=7, 26%):
  - *Pick another location.*
  - *By using less fire arms and grenades. The Army should do more hand to hand combat and use safe technology for firearms.*
  - No
  - *Please involve all PRACTITIONORS AS MYSELF TO NOW HAVE SAY, CONCERNING MILITARY LAND USE AT THESE PROJECTS*
  - No
  - No
  - *Yes, DO NOT renew the army's lease!!! They will damage & kill the natural habitat of these areas.*
- Skipped responses (n=20, 74%)

**Question 15:** *Are you aware of any traditions or customs that may be impacted by such a project? What might those impacts be?*

- Responses (n=6, 22%):
  - *The practices of the Makahiki games and traditions could be impacted, native plants and birds too. The James Campbell Wildlife Refuge would be impacted.*
  - No
  - *Yes.... PUPUKEA AND PAUMALU.... Our ANCESTORS IWI BONES HAS BEEN PLACED IN BOXES AND ON SHELVES FOR YEARS AND NOW AFTER 12 years of being in the Faces of OAHU KAPOLEI DLNR ALAN DOWNER.... There is NO FUNDING AND OR ASSISTANCE TO FINISHING THE HEIAU FROM BEING COMPLETED... now in Pupukeya Paumalu Ahupuaa.... WE HAVE A UNFINISHED NAMELESS GRAVE....PLEASE HELP ASSIST ME LAY MY PUPUKEA PAUMALU ANCESTORS IN PEACE*
  - None
  - No
  - *Gathering rights, native flora & fauna, underground water sheds*



- No responses (n=21, 78%)

**Question 16:** *Can you think of ways in which any potential impacts can be minimized, mitigated, or avoided?*

- Responses (n=6, 22%):
  - *If the Army did more running, training exercises and could participate in Makahiki games, explosives can be avoided.*
  - *No*
  - *Getting those as myself involved with your IMPACTS OF IMPROVEMENTS... thank you*
  - *None*
  - *No*
  - *Yes, Do Not allow the military to damage this island any more than they already have! They have developed & ruined sooo much of Hawaii Nei-just look around*
- No responses (n=21, 78%)

**Question 17:** *Do you have any recommendations for conditions or best management practices for the project, should it proceed?*

- Responses (n=6, 22%):
  - *Best Management practices would be to set traps for the mongoose and cats, support the Hawaiian moor hen population to control the slug problem or place Epsom salt and plant more Koa and Iliahi trees.*
  - *Let the Army manage the land*
  - *Please get more CULTURAL PRACTITIONERS INVOLVED TO HAVE A SAY... MOST OF OUR VOICES IS NOT APPRECIATED BY MADEUP GROUPS THAT ALREADY HAVE THEIR OWN AGENDAS*
  - *None*
  - *No*
  - *Do not proceed with the project!! Return the land back*
- No responses (n=21, 78%)

**Question 18:** *Is there anything else you would like to share?*

- Responses (n=6, 22%):
  - *Lewa is a highly respected diety in the Kahuku area which associates with nurturing, and the feminine aspect.*
  - *The Army has rules that protect the Aina.*
  - *Yes.... more foreign developments needs to take our KU KANAKA MAOLI ANCESTORS TRADITIONAL PROTOCOLS SERIOUSLY AND GET OUR ISLAND HAWAIIANS A CHANCE TO SPEAK AND BE HEARD*

- No
- I fully support the retention of training lands.
- The military should leave Hawaii, they are an unwelcome Occupier
- No responses (n=21, 78%)

**Question 19:** *If there are any documents you would like to share, feel free to upload them here.*

- Responses (n=1, 4%)
  - One respondent provided a screenshot as a response:



- Skipped responses (n=26, 96%)

**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 6,300 acres of State-owned land on O'ahu.*

- "Yes" responses (n=7, 26%)
- Skipped responses (n=20, 74%)

**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.*

- Responses (n=2, 7%)
- Skipped responses (n=25, 93%)

## KAWAILOA-POAMOHO TRAINING AREA (POAMOHO)

**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 6,300 acres of State-owned land on O’ahu. 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.*
  - “Yes” responses (n=10, 100%)
- 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.*
  - Skipped responses (n=0, 0%)

**Question 2:** *Please provide your name.*

- Responses (n=4, 40%)
- Skipped responses (n=6, 60%)

**Question 3:** *What is your current profession?*

- Responses (n=3, 30%)
- Skipped responses (n=7, 70%)

**Question 4:** *Where do you live now?*

- Responses (n=4, 40%)
- Skipped responses (n=6, 60%)

**Question 5:** *Where were you born and raised?*

- Responses (n=4, 40%)
- Skipped responses (n=6, 60%)

**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.*

- Responses (n=3, 30%)
- Skipped responses (n=7, 70%)

**Question 7:** *What is your association, if any, with the Project Area?*

- Responses (n=4, 40%):
  - *Resident of Wahiawa*
  - *I'm a resident of Wahiawa and have hiked Koolau and walked historic sites on Kauai, Maui, Oahu, Hawaii, and Molokai.*
  - *Home*
  - *Keep Hawaiian Land in Hawaiian Hands*
- Skipped responses (n=6, 60%)

**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?*

- Responses (n=3, 30%):
  - *We use these forests to restore our sanity from overthrow. Our aina is our mana, our soul. What do we have left? We are surrounded by military containment! Resources of our habitat are in our natural environment for medicine, for native animals that are aumakua. Military action sets our forest on fire and destroyed habitat for owls, bats and land snails. Our aina is sacred to us. These kuahiwi are all that remains to sustain our native entitlements. Stop the Steal!*
  - *Yes*
  - *All mountainous/forest regions in Hawaii are sacred! This is also part of Oahu's Watershed area, not a playground for the military*
- Skipped responses (n=7, 70%)

**Question 9:** *What place names do you know for the Project Area or areas near or adjacent to the Project Area?*

- Responses (n=3, 30%):
  - *Helemano*
  - *I've been over Poamoho trail at least 5 times taking Hawaiians to be enveloped in the kilihune mist of the Kolau ridge. We have bathed in the crater bog. We have slept in the ridge cabin. Area also known for Helemano and the ancient river rocks Kukaniloko, regarded as birth stones for its mana. I live at the edge of East range and their desecration of our environment with equipment, trappings and violent ammunition echoes morning and night. There is no reasonable purpose to practice for ground war in our ahupuaa. We live from the mountain to the sea. My neighbors still hunt puaa to feed their ohana. We are natives living on the fringes of military Communications at Helemano and Wahiawa. Respect our native legacy for this aina and Stop the Steal. Enough. Our Hawaiian Constitution was supposed to protect us but Military Action continues from 1893!*
  - *Anahulu valley, kawailoa ahupuaa*

- Skipped responses (n=7, 70%)

**Question 10:** *Are you aware of any cultural resources in the Project Area or near the Project Area? If so, please list them below.*

- Responses (n=3, 30%):
  - *You fools. Our cultural resources are our eyes looking to the Ridge the Koolau and drinking in the wild refuge we can rest there. To walk the serpentine trail the ridge is a freedom to an ancient paradigm without English conventions. We take joy in the fragrance of ohia, palaa, guawa, rose apples, every leaf surrounds us with freedom of the kuahiwi. We are Hawaiians practicing our generations paths across land that was ours. To journey in Poamoho is an empowerment only koko Hawaii can know. As we chant “mahalo e na akua,” we know we once had it all. This aina is our “all”!*
  - *Anahulu [University of Hawaii] UH excavated historical sites*
  - *This entire area is a cultural resource, full of endemic plants/insects & birds*
- Skipped responses (n=7, 70%)

**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.*

- Responses (n=4, 40%):
  - *It belongs to the people and should be returned to the people.*
  - *I have such aloha for this aina one hanau, Poamoho , I wanted my ashes placed there. It is comparable to the paradigm of Brigadoon. There are no haole concepts for the eternal spirit of Hawaii that lives in a Hawaiian who protects the land. It is the source that feeds our soul. We are born from it. Stop the Steal.*
  - *Most population of Hawaiians of all oahu at one time. Productive food valley*
  - *It’s part of Oahu’s watershed, need I say more? Plus one of the last areas on Oahu that still contain endemic species*
- Skipped responses (n=6, 60%)

**Question 12:** *Are there any stories associated with the Project Area we should be aware of? If so, please share that information below.*

- Responses (n=4, 40%):
  - *It’s land the State had no authority to lease under the Hawaiian Kingdom. It belongs to the people of Hawaii. Land that also used to be hunted and farmed.*
  - *There are many moolelo for this aina. Pele and her travels would have created the remnant crater. Laieikawai reflects the breath of history of this area ascending from Laie side. Poamoho trail descends to Laie. The presence of native puaa make this the home to Kamapuaa and his pursuit of Pele. All of the Maile sister stories would relate to this aina. Ohia growths tell of*

*Hiiakaikapoliopole. You cannot separate our oral record from this range. It lives in all the vegetation and geology around.*

- *Chinook and Osprey blade percussion rattle the stone structures in this sacred valley used for helicopter navigation*
- *Of course! Too bad most are lost due to Genocide of the Kanaka Maoli!*
- Skipped responses (n=6, 60%)

**Question 13:** *The Department of the Army is proposing retention of up to approximately 4,370 acres of State-owned land at the Kawaihoa-Poamoho Training Area. Tax Map Key (TMK) (1) 7-2-001:006 in the ahupua'a of Wahiawā and Wai'anae Uka on the Island of O'ahu. Are you aware of any resources that may be impacted by such a project? What might those impacts be?*

- Responses (n=4, 40%):
  - *The military is the largest producer of waste in the State of Hawaii. That waste leaks into our water resources. They already occupy lots of Hawaii's prime land. The people NEED the land back as the military occupants take up too much of our housing resources, don't pay taxes for our roads, restricts the people from land they no longer have access to, and more.*
  - *They set the forest ablaze. It destroyed all native vegetation. Any native specie, rare manu, land snails depending on the elevation and denuded the ground. The neighborhood was evacuated. We are afraid of all out fire in our forest. Secondly the sounds of war, helicopters and AW50, AK15 and other munitions destroy our serenity. Ka lai. How much more must be stolen? Isn't it enough we are so reduced in quantum to barely register as Native People? We are! Our blood runs from Mauka to Makai. Stop. Just Stop.*
  - *Noise, WWII noise, last century war machines useless in next conflict Burnt oil fuel pollution.*
  - *Endemic plants/insects/birds/water shed related areas-its all related*
- Skipped responses (n=6, 60%)

**Question 14:** *Can you think of ways in which any potential impacts can be minimized, mitigated, or avoided?*

- Responses (n=4, 40%):
  - *If the land is returned to the people and the military removes themselves from it. Cleans up any waste from the land as well.*
  - *Stop. I have walked the land you are stealing. It is my kuleana. Not yours. I am descended from this ahuapuaa. My name Kalaukieleula is "Fragrance of gardenia in the Forest." It is recorded in Laieikawai. I am a reflection of generations. Stop the steal. Put land back to its original life without you.*
  - *Train over less populated areas. Use 1T\$ DOD funds for the future good.*
  - *Yes, DO NOT ALLOW the military to renew their lease!! They shouldn't be "bombing/shooting/stomping around" in a native Watershed forest!!*

- Skipped responses (n=6, 60%)

**Question 15:** *Are you aware of any traditions or customs that may be impacted by such a project? What might those impacts be?*

- Responses (n=3, 30%):
  - *Restrictions to my accessibility. My generations to come will be deprived of the freedom to walk through their history and unable to harvest resources for food or religion of the hula or medicinal practices.*
  - *Peace and serenity in our homes, valleys, mountains, shore and seas.*
  - *Endemic Species!!! Look it up*
- No responses (n=7, 70%)

**Question 16:** *Can you think of ways in which any potential impacts can be minimized, mitigated, or avoided?*

- Responses (n=4, 40%):
  - *No renewal of the lease and cleaning of the land.*
  - *Stop the steal.*
  - *Use less populated location*
  - *Yes, kick the Military out! They have destroyed enough of Hawaii's ecosystems irreparably!*
- No responses (n=6, 60%)

**Question 17:** *Do you have any recommendations for conditions or best management practices for the project, should it proceed?*

- Responses (n=4, 40%):
  - *Allow full access for the people for housing, hunting and agriculture on the land.*
  - *No. I am 78. I am fully aware of how much has been taken through the colonization of Hawaii. We as Hawaiians have the worst of academic resources, relegated to poverty as our land is an international market we can't afford. We are enslaved to a visitor industry and military sacrifices. We have been marginalized by conscious immigration to diffuse blood quantum. The Overthrow and haole infusion of WWII have destroyed, actualized genocide. This expansion and continuation furthers our degradation.*
  - *Protests outside gates.*
  - *It SHOULD NOT proceed!! The Military has continuously damaged native ecosystems! It's not a matter of IF, but when & how much will be damaged. The military's continuous damage/destruction is well documented*
- No responses (n=6, 60%)



**Question 18:** *Is there anything else you would like to share?*

- Responses (n=4, 40%):
  - *I oppose any renewal of the land lease.*
  - *Stop the Steal. Restore our mauka retreats. Let us live. Let our Hawaii live.*
  - *We have endured increase military helicopters and convoys, 50 caliber and rifle fire day and night that echo down thru our walls and bones. Endless rimpac. The army used to stop when complaints got this severe. We get no reprove, sunday for a few hours maybe. Stop please.*
  - *Return all Native Hawaiian Lands! The military is illegally occupying Hawaii & their desecration should not be condoned any longer!*
- No responses (n=6, 60%)

**Question 19:** *If there are any documents you would like to share, feel free to upload them here.*

- Responses (n=0, 0%)
- Skipped responses (n=10, 100%)

**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 6,300 acres of State-owned land on O'ahu.*

- "Yes" responses (n=4, 40%)
- Skipped responses (n=6, 60%)

**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.*

- Responses (n=2, 20%)
- Skipped responses (n=8, 80%)

## MAKUA MILITARY RESERVATION (MMR)

**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 6,300 acres of State-owned land on O'ahu. 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.*
  - "Yes" responses (n=31, 100%)
- 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.*
  - Skipped responses (n=0, 0%)

**Question 2:** *Please provide your name.*

- Responses (n=7, 23%)
- Skipped responses (n=24, 77%)

**Question 3:** *What is your current profession?*

- Responses (n=7, 23%)
- Skipped responses (n=24, 77%)

**Question 4:** *Where do you live now?*

- Responses (n=7, 23%)
- Skipped responses (n=24, 77%)

**Question 5:** *Where were you born and raised?*

- Responses (n=7, 23%)
- Skipped responses (n=24, 77%)

**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.*

- Responses (n=6, 19%)
- Skipped responses (n=25, 81%)

**Question 7:** *What is your association, if any, with the Project Area?*

- Responses (n=7, 23%):
  - *I am a resident who does native plant restoration in the area with state parks and I find military remnants constantly while trying to restore the land*
  - *I've been visiting and swimming at Makua Beach for 33 years.*
  - *Reside in the Moku*
  - *None*
  - *N/A*
  - *Traveler*
  - *Resident of O'ahu*
- Skipped responses (n=24, 77%)

**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?*

- Responses (n=7, 23%):
  - *I am aware that Mākua is land that was taken from the people and used for target practice during the war... The land was to be given back but has not been done.*
  - *Yes, there are remnants of a heiau in Makua Valley*
  - *True*
  - *None*
  - *Yes, some. This is a sacred place for Native Hawaiian people.*
  - *Yes*
  - *Makua valley has many cultural artifacts, cultural sites, and endanger native plants and animals. Cultural sites include burials sites. The current lack of oversight has made access to these sacred sites dangerous and difficult.*
- Skipped responses (n=24, 77%)

**Question 9:** *What place names do you know for the Project Area or areas near or adjacent to the Project Area?*

- Responses (n=6, 19%):
  - *Mākaha, Kea'au, Ohikilolo, Mākua, Kahanahāiki, Keawa'ula, Ka'ena*
  - *Kaneana cave*
  - *Lele*
  - *Ohikilolo, Keawaula, Keaau*
  - *Makua cave, makia beach, keawaula beach, kuaokala forest reserve*
  - *Keavaula, Makua, Leaping place of Souls*
- Skipped responses (n=25, 81%)

**Question 10:** *Are you aware of any cultural resources in the Project Area or near the Project Area? If so, please list them below.*

- Responses (n=6, 19%):
  - *There are multiple cultural gardens and sites on the Makai side a Farrington, starting at the cave all the way down to the point*
  - *The beach is used for hunting for fish, octopus, and crustaceans for traditional Hawaiian dishes*
  - *Iwi*
  - *No*
  - *Cultural Access*
  - *It is the place where souls departs for the afterlife, and is believed to b the place where man was created. There are ruins of villages and heist.*
- Skipped responses (n=25, 81%)

**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.*

- Responses (n=6, 19%):
  - *Makua was once a thriving Hawaiian ahupua'a prior to the arrival of western settlers. There may be important cultural artifacts throughout the valley that have been damaged by military occupation.*
  - *Traditional or Customary Practice access.*
  - *This area was once a place were ohana lived and farmed the land. A place of mythical stories about Papa and Wakea.*
  - *Please return this land to the rightful owners- the Hawaiian people. Thank you.*
  - *None*
  - *The original residents of Makua Valley were forced off of their land. It should be restored to native Hawaiians.*
- Skipped responses (n=25, 81%)

**Question 12:** *Are there any stories associated with the Project Area we should be aware of? If so, please share that information below.*

- Responses (n=5, 16%):
  - *There is a legend that Kamehameha called Makua barking sands because of the sound the waves makes on the beach.*
  - *Observed and counted 12 Albatross birds at Kaena Point for a Botany class assignment.*
  - *Many, do the research*
  - *Countless Hawaiian stories*

- *The army has plastered the landscape with unexploded ordinance which still has not been clean up.*
- Skipped responses (n=26, 84%)

**Question 13:** *The Department of the Army is proposing retention of up to approximately 760 acres of State-owned land at the Makua Military Reservation. Tax Map Key (TMK) (1) 8-1-001:007 and 008; (1) 8-2-001:001, 022, 024, and 025 in the ahupua‘a of Mākua, Kahanahāiki and Ko‘iahi in the moku of Wai‘anae on the Island of O‘ahu. Are you aware of any resources that may be impacted by such a project? What might those impacts be?*

- Responses (n=6, 19%):
  - *The impact is directly affecting native people engaging in native practices on land that has been destroyed by invasive species both people and plants and needs to be restored*
  - *Native Hawaiians access to ‘aina is restricted when that could be used for traditional food cultivation, religious practices, educational services, and even housing*
  - *The entire Moku of Waianae will be directly impacted with Industrial Multi Complexes.*
  - *All of nature, including fragile native plants, potential sacred burial sites and potential water impacts*
  - *Remove all hazards, take down fences, restore community*
  - *Farmland, cultural sites, water rights and water resources.*
- Skipped responses (n=25, 81%)

**Question 14:** *Can you think of ways in which any potential impacts can be minimized, mitigated, or avoided?*

- Responses (n=7, 23%):
  - *The military needs to handover the land, mitigate damages and exit peacefully*
  - *The ‘aina should be restored to Native Hawaiians to decide on our own usage*
  - *Aside from Humpback Whales, all living fauna are unavoidable therefore it’s a direct impact.*
  - *Stop using for military purposes, allow the Aina to rest and replenish*
  - *It is preferred to avoid this part of the island. There is a perception that Waianae is “at the bottom of the list” with regards to cultural recognition- I.e landfills get proposed here as opposed to other more affluent parts of the island. Waianae is not a dumping ground and should be respected for the cultural history that exists here.*
  - *Don’t lease to military. Duh.*

- *Army should clean up and let go of the lease. We are not at war-it should be returned to the people of Hawai'i as promised. There is nothing they can do except clean up before they move out.*
- Skipped responses (n=24, 77%)

**Question 15:** *Are you aware of any traditions or customs that may be impacted by such a project? What might those impacts be?*

- Responses (n=4, 13%):
  - *The visiting of sacred heiau is severely impacted*
  - *Diluting the existing ancient Koa's minimizes our ancient lele's.*
  - *Lack of access not allowing cultural access without restriction*
  - *Makua Valley is considered a place of healing and many herbal medicines grow wild in the area.*
- No responses (n=27, 87%)

**Question 16:** *Can you think of ways in which any potential impacts can be minimized, mitigated, or avoided?*

- Responses (n=4, 13%):
  - *Demilitarize Hawai'i*
  - *The potential of such industrious plan will completely destroy it's existing resources. The future climate changes will enhance sea level rises which this 760 acre project will add to it's potential problems within a few years.*
  - *Stop lease to U.S. government*
  - *Stop leasing land to the military and make them clean up.*
- No responses (n=27, 87%)

**Question 17:** *Do you have any recommendations for conditions or best management practices for the project, should it proceed?*

- Responses (n=5, 16%):
  - *Work with the community first and then get the government involved as opposed to having the government tell the community what will happen*
  - *The land of this particular project area should be cared for using sustainable practices, such as planting native Hawaiian plants to minimize erosion and run off of hazardous materials into the ocean.*
  - *This project has deep potential to destroy this islands natural setting. Hawaii is in the middle of the Pacific Ocean above the equator. It's isolation from continents can easily wreak havoc on it's 763 acres easily. A U.S. Federal Military has a history that lacks the concerns for Pacific Islanders, therefore it should be dismissed.*
  - *See above*

- *Land should be given to the department of Hawaiian Homelands.*
- No responses (n=26, 84%)

**Question 18:** *Is there anything else you would like to share?*

- Responses (n=5, 16%):
  - *Have concern for the numerous lives that have been lost due to the militaries impact on native lands, in Keawa'ula alone there are numerous unexploded ordinances, And that is a public hazard and needs to be remediated*
  - *I would love to see Makua Valley returned to Native Hawaiian stewardship.*
  - *The United States Army should take their 'Bunker Fantasy' elsewhere!*
  - *Please consider another part of this island for this project. Thank you.*
  - *Thank you for allowing our voice*
- No responses (n=26, 84%)

**Question 19:** *If there are any documents you would like to share, feel free to upload them here.*

- Responses (n=1, 3%)
  - One respondent provided a photo as a response:



- Skipped responses (n=30, 97%)

**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 6,300 acres of State-owned land on O'ahu.*

- "Yes" responses (n=6, 19%)

- Skipped responses (n=25, 81%)

**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.*

- Responses (n=2, 6%)
- Skipped responses (n=29, 94%)



## **APPENDIX C: INTERVIEW QUESTIONS**

Honua Consulting, LLC (Honua) conducted one-on-one interviews for the Cultural Impact Assessment (CIA) for Army Training Land Retention of State Lands in Kahuku Training Area (KTA), Kawaihoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR), Island of O‘ahu, Hawai‘i. During the interview, twenty-one questions were asked 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. These twenty-one questions are transcribed below.

**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 6,300 acres of State-owned land on O‘ahu. 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.

**Question 2:** Please provide your name.

**Question 3:** What is your current profession?

**Question 4:** Where do you live now?

**Question 5:** Where were you born and raised?

**Question 6:** Are you associated or representing a specific Native Hawaiian Organization (NHO), ‘ohana, or organization in the completion of this survey?

**Question 7:** What is your association, if any, with the Project Area?

**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?

**Question 9:** What place names do you know for the Project Area or areas near or adjacent to the Project Area?

**Question 10:** Are you aware of any cultural resources in the Project Area or near the Project Area?

**Question 11:** Is there anything about the Project Area that's particularly significant you would like to share?

**Question 12:** Are there any stories associated with the Project Area we should be aware of?

**Question 13 (KTA):** The Department of the Army is proposing retention of up to approximately 1,170 acres of State-owned land at the Kahuku Training Area. TMKs (1) 5-8-002:002 and (1) 5-9-006:026 in the ahupua'a of Paumalū, Waiale'e, and Pahipahiālua in the moku of Ko'olauloa on the Island of O'ahu. Are you aware of any resources that may be impacted by such a project? What might those impacts be?

**Question 13 (Poamoho):** The Department of the Army is proposing retention of up to approximately 4,370 acres of State-owned land at the Kawaihoa-Poamoho Training Area. Tax Map Key (TMK) (1) 7-2-001:006 in the ahupua'a of Wahiawā and Wai'anae Uka on the Island of O'ahu. Are you aware of any resources that may be impacted by such a project? What might those impacts be?

**Question 13 (MMR):** The Department of the Army is proposing retention of up to approximately 760 acres of State-owned land at the Makua Military Reservation. Tax Map Key (TMK) (1) 8-1-001:007 and 008; (1) 8-2-001:001, 022, 024, and 025 in the ahupua'a of Mākua, Kahanahāiki and Ko'iahi in the moku of Wai'anae on the Island of O'ahu. Are you aware of any resources that may be impacted by such a project? What might those impacts be?

**Question 14:** Can you think of ways in which any potential impacts can be minimized, mitigated, or avoided?

**Question 15:** Are you aware of any traditions or customs that may be impacted by such a project? What might those impacts be?

**Question 16:** Can you think of ways in which any potential impacts can be minimized, mitigated, or avoided?

**Question 17:** Do you have any recommendations for conditions or best management practices for the project, should it proceed?

**Question 18:** Is there anything else you would like to share?

**Question 19:** If there are any documents you would like to share, please feel free to share them now or email them later.

**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 6,300 acres of State-owned land on O'ahu.

**Question 21 (OPTIONAL):** If you would like to update your contact information, feel free to do so now. This information will be redacted from your response in the CIA to protect your privacy.

**APPENDIX D: INTERVIEW SUMMARIES (AS APPROVED BY INTERVIEWEES)**

## D-1 KAHUKU TRAINING AREA (KTA)

Specific individuals with known cultural or historical expertise of the KTA project area were contacted by phone to request an interview. One-on-one interviews were conducted with eight individuals associated with the KTA project area (Table D-1). Summaries of each interview are provided in the sections below. All summaries are interviewee statements and opinions and do not reflect the statements or opinions of the authors of the report. Biographical information for each interviewee is provided in Section 2.2.2.1 in the main CIA document. At the request of the Army, footnotes were added to some interviews to provide geographic notations and, in some cases, the Army’s perspective on the topic discussed. Some of the cultural resources, practices, and beliefs mentioned by interviewees are located outside of the project area or the broad geographical area and are not discussed in the main body of the CIA.

**Table D-1. Individuals Interviewed for KTA Project Area**

INTERVIEWEE	INTERVIEW TYPE
Mr. Peter Apo	Telephone
Mr. (Norman) Mana Kaleilani Cáceres	Telephone
Mr. (Nathan) Keola Grace	Telephone
Mr. Neil J.K. Hannahs	In person
Mr. Allen Hoe	Telephone
Mr. Kyle Kajihiro	Telephone
Mr. Thomas Lenchanko	Telephone
Mr. Christophor Edward Oliveira	Telephone

### D-1.1 MR. PETER APO

The interview with Mr. Peter Apo was conducted by Mr. Matthew Sproat from Honua Consulting, LLC on June 15, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed retention of the State-owned land at KTA and the broad geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

#### Cultural Resources

Mr. Apo is aware of cultural resources; however, he stated that he does not know where they are specifically located.

### **Cultural Practices and Beliefs**

Mr. Apo has no information or knowledge of cultural practices or beliefs associated with the KTA project area or the broad geographical area.

### **Impacts**

Mr. Apo provided no knowledge of any impacts associated with the KTA project area or the broad geographical area.

### **Mitigation Measures and Recommendations**

Mr. Apo reiterated some of the same mitigation recommendations for the KTA project area as he does for the MMR project area (see Section D-3.2 later in this appendix).

Mr. Apo further stated that he believes we're in a period where there is no government process that provides a method or process in which cultural or injury can be validated.

Mr. Apo believes that cultural assessments are important. He believes that what we are doing now in hitting the reset button and the timing is good. He supports the process and acknowledges that even though he does not know specifically the challenges for the KTA project area (“ . . . there are challenges, no question about it . . .”), there needs to be interaction and dialogue between the State and the Army.

Mr. Apo supports the Army's lease being renewed, provided that the public interests will be served and protected.

## **D-1.2 MR. (NORMAN) MANA KALEILANI CÁCERES**

The interview with Mr. (Norman) Mana Kaleilani Cáceres was conducted by Mr. Sproat from Honua Consulting, LLC on June 13, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed retention of the State-owned land at KTA and the broad geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

### **Cultural Resources**

Mr. Cáceres shared how he understands the Kahuku area and surrounding areas to be a cultural resource in and of itself. Rather than looking at specific cultural resources that can be found within the KTA project area, he asserted that it is important to recognize that the entire landscape is a cultural resource. He

discussed traditional burials and iwi as being present within and around the KTA project area.<sup>1</sup> Mr. Cáceres mentioned pueo breeding areas and shared that he recalls his grandmother teaching him that pueo often nest near places where kūpuna were laid to rest.

### **Cultural Practices and Beliefs**

Mr. Cáceres mentioned the responsibility of caring for human remains (iwi kūpuna) as a customary practice connected to the area. He shared how his grandmother passed down stories from her mother about how burials and burial caves were cared for. These burials exist within and around the KTA project area<sup>2</sup> throughout Kahuku. Mr. Cáceres shared that the Kahuku area<sup>3</sup> is the final resting place for many people's ancestors.

Mr. Cáceres shared that his family passed down stories to him about how back in the day teenagers would go and take things from different caves. His grandmother was known as the caretaker of these burial caves, so they often brought the items to her, and she would be able to tell which cave they came from just by looking at them. She would give Mr. Cáceres' dad and uncle instructions on how to return the items.

### **Impacts**

Mr. Cáceres discussed how Kahuku and the surrounding area as a whole is a cultural resource, specifically for its connection to ancient burial sites. This resource is negatively impacted by the Army's retention and use of the land. He explained how because the land the Army leases is inaccessible to the public,<sup>4</sup> he has noticed that people go around the Army lands and disrupt burial sites. They have had their dry-stone stacked walls undone by people wanting to see what is inside the caves. Mr. Cáceres believes people would not be going in these areas if they had access through the land the Army leases.

Mr. Cáceres also discussed how access is impacted by the Army's retention of the land in Kahuku. He shared how his family deals with iwi that have been removed and taken elsewhere. When these iwi are returned they would ideally work with the community to decide where the iwi should be reburied. Right now with the Army occupying so much land in Kahuku, they would not be able to consider those areas for

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<sup>1</sup> Army records do not include any known burial sites within the State-owned land at KTA but do include known burial sites in the broad geographical area (Gross et al. 2023:46; Historical and Cultural Resources Literature Review, Appendix I to the O'ahu ATR EIS).

<sup>2</sup> Army records do not include any known burial sites within the State-owned land at KTA but do include known burial sites in the broad geographical area (Gross et al. 2023:46; Historical and Cultural Resources Literature Review, Appendix I to the O'ahu ATR EIS).

<sup>3</sup> Interviewee did not specify exact location.

<sup>4</sup> See Section 7.1 in main CIA document for a description of access in KTA.



reburial. According to Mr. Cáceres, burial maintenance is a traditional practice currently impacted by the Army's use of the land in Kahuku.<sup>5</sup>

### **Mitigation Measures and Recommendations**

Mr. Cáceres discussed how the areas that contain burial grounds should not be in the jurisdiction of the Army. Should the lease be renewed in 2029, sites with burials should be removed from their jurisdiction<sup>6</sup> and Native Hawaiian Organizations should become the stewards of these resources. He listed CNHA [Council for Native Hawaiian Advancement] or OHA [Office of Hawaiian Affairs] as potential entities that could take over stewardship of these areas. He also mentioned that a comprehensive inventory of cultural sites within the KTA project area should be undertaken.

### **D-1.3 MR. (NATHAN) KEOLA GRACE**

The interview with Mr. (Nathan) Keola Grace was conducted by Mr. Sproat from Honua Consulting, LLC on May 11, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed retention of the State-owned land at KTA and the broad geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

#### **Cultural Resources**

Mr. Grace mentioned that the Ka'io family has a kalo patch in the area.<sup>7</sup> Kalo grown in the area is a valuable cultural resource.

#### **Cultural Practices and Beliefs**

Mr. Grace was not aware of any specific cultural practices and beliefs associated with the KTA project area, aside from kalo farming.

#### **Impacts**

Mr. Grace discussed how the presence of munitions and other explosive materials<sup>8</sup> can impact the land and practices like kalo production. These materials can also impact water resources and even the ocean.

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<sup>5</sup> Requests for access to conduct burial maintenance and other cultural activities at KTA are considered and honored in accordance with the 2018 Programmatic Agreement (USAG-HI 2018a).

<sup>6</sup> Army records do not include any known burial sites within the State-owned land at KTA but do include known burial sites in the broad geographical area (Gross et al. 2023:46; Historical and Cultural Resources Literature Review, Appendix I to the O'ahu ATR EIS).

<sup>7</sup> Interviewee did not specify exact location.

<sup>8</sup> There are no recorded munitions within the KTA project area.

### **Mitigation Measures and Recommendations**

Mr. Grace shared that minimizing the use of munitions and limiting the Army's land use so that cultural resources are not impacted would be ideal. He recommends that the Army work closely with kūpuna and cultural practitioners in the area on how best to use the land in the Kahuku area.

#### **D-1.4 MR. NEIL J.K. HANNAHS**

The interview with Mr. Neil J.K. Hannahs was conducted by Mr. Sproat from Honua Consulting, LLC on June 20, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed retention of the State-owned land at KTA and the broad geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

#### **Cultural Resources**

Mr. Hannahs said there are valuable water resources in the general area, including streams and a bog.

#### **Cultural Practices and Beliefs**

According to Mr. Hannahs, there is active watershed protection going on in the general area<sup>9</sup> and at the ridge level of the Ko'olau Range, as well as Uko'a wetlands and Loko Ea fishpond.<sup>10</sup>

#### **Impacts**

Mr. Hannahs noted that because all environments are connected, upstream effects will impact the downstream environment. He also said there are important habitats in the area.

#### **Mitigation Measures and Recommendations**

Mr. Hannahs said that in order to mitigate impacts, there needs to be a holistic framework that seeks to address how impacts in one area can impact other areas. He stated that individuals need to know about the place and what responsibilities are tied to the place. Mr. Hannahs also said the Army also needs to know all the waterways, streams, and watersheds in order to mitigate impacts.

#### **D-1.5 MR. ALLEN HOE**

The interview with Mr. Allen Hoe was conducted by Mr. Sproat from Honua Consulting, LLC on June 14, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed retention of the State-owned land at KTA and the broad

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<sup>9</sup> Interviewee did not specify exact location.

<sup>10</sup> Uko'a wetlands and Loko Ea fishpond are not within the State-owned land at KTA or the broad geographical area.

geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

### **Cultural Resources**

Mr. Hoe shared that there is a very sacred heiau on a bluff overlooking Waimea.<sup>11</sup> He believes this heiau is the most important cultural resource in the area.

### **Cultural Practices and Beliefs**

Mr. Hoe was not personally aware of any specific cultural practices and beliefs associated with the KTA project area.

### **Impacts**

Mr. Hoe explained that there may be a number of activities that will result in erosion but did not expand on this notion.

### **Mitigation Measures and Recommendations**

Mr. Hoe said that there are probably methods to mitigate erosion. He said that there should be consultation with experts on environment, flora, and fauna.

## **D-1.6 MR. KYLE KAJIHIRO**

The interview with Mr. Kyle Kajihiro was conducted by Mr. Sproat from Honua Consulting, LLC on June 15, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed retention of the State-owned land at KTA and the broad geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

### **Cultural Resources**

Mr. Kajihiro mentions a fishpond in Waiale'e but does not have much personal knowledge of cultural resources in the KTA project area. He also mentions that others have testified in cultural monitoring and archaeological projects of the area that iwi kūpuna were found, along with many historic sites being ignored by the Army while engaging in ground disturbing activities. Mr. Kajihiro claims that the archaeological and cultural monitoring reports conducted for KTA throughout the years have been inadequate.

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<sup>11</sup> This heiau is not within the State-owned land at KTA or the broad geographical area.

## **Cultural Practices and Beliefs**

Mr. Kajihiro does not have any specific knowledge of cultural practices or beliefs associated with the KTA project area; however, he is aware of the loko i'a (fishpond) in the area of Waiale'e.<sup>12</sup>

Mr. Kajihiro mentioned there is a leina a ka 'uhane (soul's leap) in Kahuku.<sup>13</sup> He was also told at one time that Kahuku was a floating area of land, and the great demi-god Maui, used his fishhook to connect Kahuku back to the island. This fishhook is said to be buried somewhere in Waiale'e.

## **Impacts**

Mr. Kajihiro believes not having access to KTA limits our knowledge base for the area.<sup>14</sup> He also said that restriction of access causes cultural harm by impeding cultural practices and resulting in the erosion of historical knowledge over time. Mr. Kajihiro stated there will be generations who will over time have no sense of connection to the place. He mentions that the intensity of training conducted in KTA has major negative effects on the resources.

## **Mitigation Measures and Recommendations**

Mr. Kajihiro suggests that the community who are affected and most connected to these places should be the ones who determine access and proper use and should be involved in shaping a cultural use plan that incorporates revitalizing cultural practices and re-connecting people to the land. He believes the 'āina lives through the ability of people to care for it, which mitigates the harm. Mr. Kajihiro recommends that no heavy equipment and training be allowed in the area. He also recommends actions should be taken to restore the native forest, remove invasive plants, and allow Hawaiian community groups who have kuleana to this area to develop a cultural use plan that revitalizes their connection to the place. He also suggests that the Army leverage youth and kūpuna in helping to transmit the thriving of knowledge so these ancient practices can continue.

### **D-1.7 MR. THOMAS LENCHANKO**

The interview with Mr. Thomas Lenchanko was conducted by Mr. Sproat and Dr. Trisha Kehaulani Watson-Sproat from Honua Consulting, LLC on May 10, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed

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<sup>12</sup> A fishpond, called Kalou, is approximately 425 meters north of the KTA project area (within the broad geographical area).

<sup>13</sup> During research, the authors did not find a leina a ka 'uhane within the State-owned land at KTA or the broad geographical area, and the interviewee did not provide a specific location for this resource.

<sup>14</sup> See Section 7.1 in main CIA document for a description of access in KTA.

retention of the State-owned land at KTA and the broad geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

### **Cultural Resources**

Mr. Lenchanko shared that the Kahuku area has many native hardwood trees including sandalwood and alahe'e that are used for traditional carving and wood working practices. Many of these cultural resources, some of them very rare, were cut down during development but he and others pointed out their significance in hopes of preserving the trees in the area. The mountainous region in Kahuku was home to many native hardwood trees that are unique to the area. Mr. Lenchanko shared that the 'ohana from Kahuku shared with him that they sighted over 100 different native plants found within the KTA area.<sup>15</sup> Mr. Lenchanko considers areas like Kahuku to be traditional cultural properties (TCPs) that have cultural significance.

Mr. Lenchanko discussed burials, and how they are found throughout TCPs. He mentioned that the military often skirts around this issue, claiming that they are not training where there are burials or remains.

Mr. Lenchanko discussed how pueo frequent the Kahuku area and travel up to the central plain and on towards the Wai'anae Range. Pueo rest during the day and nest on the ground, making them a vulnerable cultural resource. He shared that the last time he was in Kahuku he did not see any pueo, but pueo are often only seen in certain places and times of day.

### **Cultural Practices and Beliefs**

Mr. Lenchanko refers to the larger Kahuku area and its connection to the central plain as the ka'ānani'au of 'Ō'io. This is a traditional name for this particular land section that was later broken into ahupua'a. Mr. Lenchanko explained that before the ahupua'a system was implemented on O'ahu, the land was divided into ka'ānani'au. This land management system was more focused on family and the shared, generational responsibility to steward land and resources. The ka'ānani'au system had retainers for the land. This system allowed for sharing of resources, mauka to makai, and included several land sections. Mr. Lenchanko says that he and other practitioners continue this practice today. He shared that an ali'i born in Kahuku could be taken to Kūkaniloko for protection, because it is a pu'uhonua (place of refuge). That is what makes these access points and land divisions so critical, according to Mr. Lenchanko.

Mr. Lenchanko described how Kahuku and the ka'ānani'au of 'Ō'io include the old trail systems that lead to Pūpūkea, Kūkaniloko, and other significant areas. These trails were used by ali'i and people to access

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<sup>15</sup> Interviewee did not specify exact location.

different areas throughout the kaʻānaniʻau. No matter who ruled, these trails were maintained and utilized.

Mr. Lenchanko shared how Kahuku is connected to traditions of nightmarchers and is also connected to burial sites.

### **Impacts**

Mr. Lenchanko discussed how access to land retained by the military makes it impossible for Hawaiians and practitioners to assess what cultural resources are still there. Lack of access prevents practitioners from doing any traditional practices and connecting to ancestral lands.<sup>16</sup> Mr. Lenchanko asserted that TCPs have so much potential for cultural use, but the people are not able to access them. Mr. Lenchanko believes that Hawaiians have the right and responsibility to be retainers of the land and the military lease prevents this practice.

Mr. Lenchanko believes that development often impacts cultural resources like native plants and animals, but they have little way of knowing what remains when they do not have access to these lands. From Schofield all the way to Kahuku the development and use of military lands, including the development of roads, have impacted cultural resources and traditional practices in those areas.

### **Mitigation Measures and Recommendations**

Mr. Lenchanko stated that the military should give back the land. All of the leased properties should be returned to the State. He stated that the parcel is small and cannot be of much use to the military to begin with. Their occupation of these lands is unnecessary.

Should the military retain their lease, Mr. Lenchanko feels the people should be granted a perpetual easement that grants them access to the property to perform traditional practices and access cultural resources. This includes maintaining the land as a kaʻānaniʻau. He is requesting that the military draft an inventory of all native species, plants, and cultural resources on their properties. Because the people do not have access to these lands, they have the right to know what is still there and how it is being impacted. This will allow the people to respond to the impacts on these resources.

#### **D-1.8 MR. CHRISTOPHOR EDWARD OLIVEIRA**

The interview with Mr. Christophor Edward Oliveira was conducted by Mr. Sproat from Honua Consulting, LLC on June 5, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed retention of the State-owned land at KTA and

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<sup>16</sup> See Section 7.1 in main CIA document for a description of access in KTA.

the broad geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

### **Cultural Resources**

Mr. Oliveira explained that the lands within KTA contain “super burials”<sup>17</sup> or large burial sites with iwi kūpuna. He shared that they just recently discovered two new burial sites in caves. The iwi will be relocated.<sup>18</sup> The Kahuku area is home to many burial sites and burial caves, according to Mr. Oliveira.

Mr. Oliveira also shared that Kahuku<sup>19</sup> contains many heiau, including Keana Heiau. Some of these heiau extend up onto the ridgeline, extending as far as Waimea. These heiau are associated with burials and were often where the highest ranking aliʻi and kahuna had their bones laid to rest and hidden.

### **Cultural Practices and Beliefs**

Mr. Oliveira shared how lāʻau lapaʻau was a traditional practice associated with the Kahuku and surrounding areas.<sup>20</sup> He explained how Oʻahu’s traditional form of governance was a system called Kaʻānaniʻau which left the governing of the people more open and collective. Instead of having specific lāʻau lapaʻau practitioners with regulations, the people learned and practiced this skill and tradition as needed. Mr. Oliveira expressed that in places like Kahuku, you can confidently say that all traditions and cultural practices were once maintained from canoe carving to medicinal practices. However, being that the land is now occupied by the military and closed off, the people are unable to restore and maintain those practices.

Mr. Oliveira discussed the significance of Kāne worship on Oʻahu, including sun worship. The sun and water are forms of Kāne. Kahuku and the surrounding area was home to many kāhuna. Kāhuna lineages are significant in terms of religious worship and guidance to the people. He mentioned the history of the famous kahuna, Kaʻōpuluhulu, who came from Waimea, Oʻahu. These traditions date back to the 1700s. Mr. Oliveira also explained how investigating the variation and evolution of place names reveals the significance of specific ʻāina.

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<sup>17</sup> Army records do not include any known burial sites within the State-owned land at KTA but do include known burial sites in the broad geographical area (Gross et al. 2023:46; Historical and Cultural Resources Literature Review, Appendix I to the Oʻahu ATLR EIS).

<sup>18</sup> According to the Army, two burial sites were discovered outside of the State-owned land at KTA. The Native American Graves Protection and Repatriation Act (NAGPRA) process is nearing completion and the current plan of action is to leave the iwi in-place at the burial sites (D. Crowley, USAG-HI, personal communication, April 2023).

<sup>19</sup> Interviewee did not specify exact location.

<sup>20</sup> Interviewee did not specify exact location.

## **Impacts**

Mr. Oliveira discussed how the land is impacted by military training. The Army does not clean up after themselves and has a huge impact on the land and other cultural resources. He feels it shows a lack of awareness of the significance of the place.

Mr. Oliveira expressed how the military retaining the land prevents people from accessing the land and denies them the ability to practice any traditions they might want to restore and practice.<sup>21</sup> These practices can include anything connected to traditional ways of living and utilizing the land.

## **Mitigation Measures and Recommendations**

Mr. Oliveira stated that to mitigate impacts to cultural resources and traditions the Army should immediately stop the training in Kahuku. The Army should clean up the land and restore it. He feels that the land should be returned to the people, not the State. The land should be put in trust for the Hawaiian people, through OHA or some other way.

As best practice, Mr. Oliveira recommends that the Army find a way to accommodate the people's needs to access these lands beyond means of worship and cultural practices. The land is an important resource to the people, and it is not always for worship or specific practices, but to exist and be with the land of their ancestors.

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<sup>21</sup> See Section 7.1 in main CIA document for a description of access in KTA.



## D-2 KAWAIOLOA-POAMOHO TRAINING AREA (POAMOHO)

Specific individuals with known cultural or historical expertise of the Poamoho project area were contacted by phone to request an interview. One-on-one interviews were conducted with seven individuals associated with the Poamoho project area (Table D-2). Summaries of each interview are provided in the sections below. All summaries are interviewee statements and opinions and do not reflect the statements or opinions of the authors of the report. Biographical information for each interviewee is provided in Section 2.2.2.1 in the main CIA document. At the request of the Army, footnotes were added to some interviews to provide geographic notations and, in some cases, the Army’s perspective on the topic discussed. Some of the cultural resources, practices, and beliefs mentioned by interviewees are located outside of the project area or the broad geographical area and are not discussed in the main body of the CIA.

**Table D-2. Individuals Interviewed for Poamoho Project Area**

INTERVIEWEE	INTERVIEW TYPE
Mr. (Norman) Mana Kaleilani Cáceres	Telephone
Mr. (Nathan) Keola Grace	Telephone
Mr. Neil J.K. Hannahs	In person
Mr. Allen Hoe	Telephone
Mr. Kyle Kajihiro	Telephone
Mr. Thomas Lenchanko	Telephone
Mr. Christophor Edward Oliveira	Telephone

### D-2.1 MR. (NORMAN) MANA KALEILANI CÁCERES

The interview with Mr. Cáceres was conducted by Mr. Sproat from Honua Consulting, LLC on June 13, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed retention of the State-owned land at Poamoho and the broad geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

#### **Cultural Resources**

Mr. Cáceres shared that he is not personally familiar with the cultural resources in the Poamoho project area.

### **Cultural Practices and Beliefs**

Mr. Cáceres shared that he was not familiar with any specific cultural practices and beliefs associated with the Poamoho project area. He mentioned that the Army holding lease over the lands in Poamoho prevents cultural practitioners and Kānaka Maoli from accessing the land for whatever traditional customs they practice, including gathering.<sup>22</sup>

### **Impacts**

Mr. Cáceres discussed how the Army does not have the best record for responsible stewardship of the lands they occupy in Hawai'i. He shared that he would be hesitant to support the Army's retention of land in Poamoho for this reason. He mentioned that the Army lease currently prevents cultural practitioners and Native Hawaiians from accessing the land to use it for cultural and traditional practices and that the renewal of their lease would continue to impact access.

### **Mitigation Measures and Recommendations**

Mr. Cáceres shared that it would be better if there was some kind of Native Hawaiian Organization that had jurisdiction over the stewardship of the land, and it was not just the Army managing the parcels and limiting access. This organization could ensure that the land was being cared for properly and practitioners and Hawaiians had access to these lands.

## **D-2.2 MR. (NATHAN) KEOLA GRACE**

The interview with Mr. Grace was conducted by Mr. Sproat from Honua Consulting, LLC on May 11, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed retention of the State-owned land at Poamoho and the broad geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

### **Cultural Resources**

Mr. Grace shared that the birth stones at Kūkaniloko are a significant cultural site near the Poamoho project area.<sup>23</sup>

### **Cultural Practices and Beliefs**

Mr. Grace was not aware of any specific cultural practices and beliefs associated with the Poamoho project area, aside from Kūkaniloko.

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<sup>22</sup> See Section 7.2 in main CIA document for a description of access in Poamoho.

<sup>23</sup> Kūkaniloko Birthstones are 5.5 kilometers west of the State-owned land at Poamoho.

## **Impacts**

Mr. Grace was not aware of any specific impacts to cultural resources or traditions and customs in the area.

## **Mitigation Measures and Recommendations**

Mr. Grace shared that in his opinion any project that is culturally sound and includes and considers all parties is doable. He recommended that the project should not move forward without the guidance and direction of cultural practitioners in the area. Those who maintain that area will ensure that the project is done correctly.

### **D-2.3 MR. NEIL J.K. HANNAHS**

The interview with Mr. Hannahs was conducted by Mr. Sproat from Honua Consulting, LLC on June 20, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed retention of the State-owned land at Poamoho and the broad geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

## **Cultural Resources**

Mr. Hannahs noted that the Wai'anae Ahupua'a goes far inland to meet the Ko'olau mountains. He believes that researching the basis for this unusual configuration might shed light on how to best manage lands and resources here and elsewhere.

Mr. Hannahs noted that the Kūkaniloko Stones are cultural resources associated with the general area of the Poamoho project area. Another resource that he is familiar with is wai (water). Mr. Hannahs said the waters of the Ko'olau Range that flow down to this high plateau create the headwaters for streams, provide opportunities for agriculture and rationalize investment in storage for flood control, irrigation, and recreation.

## **Cultural Practices and Beliefs**

Mr. Hannahs noted that there are cultural practices and beliefs associated with Kūkaniloko but did not elaborate on these practices and beliefs.

## **Impacts**

Mr. Hannahs noted that because all environments are connected, upstream effects will impact the downstream environment.

### **Mitigation Measures and Recommendations**

Mr. Hannahs said that in order to mitigate impacts, there needs to be a holistic framework that seeks to address how impacts in one area can impact other areas. He asserted that individuals need to know about the place and what responsibilities are tied to the place. Mr. Hannahs also mentioned the Army also needs to know all the waterways, streams, and watersheds in order to mitigate impacts.

#### **D-2.4 MR. ALLEN HOE**

The interview with Mr. Hoe was conducted by Mr. Sproat from Honua Consulting, LLC on June 14, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed retention of the State-owned land at Poamoho and the broad geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

#### **Cultural Resources**

Mr. Hoe is not personally aware of any specific cultural resources associated with the Poamoho project area. He noted that Poahomo is fairly isolated unless you are training there as a soldier.

#### **Cultural Practices and Beliefs**

Mr. Hoe is not aware of any cultural practices and beliefs associated with the Poamoho project area.

#### **Impacts**

Mr. Hoe is not personally aware of any specific cultural resources, traditions, or customs that may be impacted by this project.

#### **Mitigation Measures and Recommendations**

Mr. Hoe does not have any recommendations for mitigation measures. He believes that the military has expended resources to protect the flora and fauna in the area.

#### **D-2.5 MR. KYLE KAJIHIRO**

The interview with Mr. Kajihiro was conducted by Mr. Sproat from Honua Consulting, LLC on June 15, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed retention of the State-owned land at Poamoho and the broad geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

#### **Cultural Resources**

Mr. Kajihiro is not aware or familiar with any cultural resources in the Poamoho area.

## **Cultural Practices and Beliefs**

During the interview, Mr. Kajihiro mentioned that the area of Kūkaniloko is the ancient piko of O‘ahu chiefs and notes that Kūkaniloko is considered to be the most sacred place on the island because it was the birthing place of the highest ranking ali‘i. He knows Mr. Thomas Lenchanko, the main kahu of Kūkaniloko, who has shared knowledge about the significance of this site with Mr. Kajihiro. Mr. Kajihiro said the landscape of Kūkaniloko radiates lines of connection outward to many points on the island, including Poamoho as well as Kapūkaki, known today as Red Hill. Mr. Kajihiro was informed by Mr. Raymond Kamaka of Waikāne that the trail from Waikāne connects to Poamoho. Mr. Emil Wolfgramm, a renowned Tongan storyteller from Waiāhole, told Mr. Kajihiro that the legendary hero Maui also has a connection to the trail that connects Waikāne to Poamoho.

## **Impacts**

Mr. Kajihiro shared that one of the biggest impacts the military has on Poamoho is its restricted access to cultural sites and landscapes.<sup>24</sup> He believes this restriction and control of the access to these areas limits the cultural knowledge and familiarity for the native peoples who have lineal and cultural ties to this particular area. Mr. Kajihiro asserted that by restricting access, the Army prevents those with cultural and genealogical ties to this land from exercising their responsibilities to those lands. He also stated that it prevents those who have knowledge of these lands and associated cultural sites and practices from teaching and transferring that knowledge to future generations. Mr. Kajihiro said with limited or no access, the knowledge and practices associated with these areas can be lost or degraded and Native Hawaiians who may have ancestral ties to those lands become alienated from those lands and histories.

## **Mitigation Measures and Recommendations**

Mr. Kajihiro recommended that potential mitigation measures include restoring native forests and removing invasive species; opening the area for regular access; returning the land to the Hawaiians who have ancestral responsibilities to this land; and allowing those groups to begin the cultural revitalization of Poamoho. Mr. Kajihiro states that he went on a site visit to Poamoho and was informed that the area was not utilized anymore for training; therefore, he requests that the Army begin planning to restore and return the lands and allow the revival of cultural practices there. He does not recommend that the Army retain the Poamoho lands. Mr. Kajihiro said, should the Army retain the leased lands of Poamoho, his suggestion is that the Army not control the access completely and there should be a Hawaiian community group in charge of planning activities for environmental and cultural restoration and revitalizing cultural practices to Poamoho.

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<sup>24</sup> See Section 7.2 in main CIA document for a description of access in Poamoho.

His final comments for Poamoho are the same as Mākua (see Section D-3.8 later in this appendix): the question driving the HEPA requirements of the EIS, including the cultural impact assessment process, is different than the federal process. He asserted that the State has a specific kuleana under its trust obligations to the ‘āina, and that those specific obligations should drive the consideration process.

#### **D-2.6 MR. THOMAS LENCHANKO**

The interview with Mr. Lenchanko was conducted by Mr. Sproat and Dr. Watson-Sproat from Honua Consulting, LLC on May 10, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed retention of the State-owned land at Poamoho and the broad geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

##### **Cultural Resources**

Mr. Lenchanko made it very clear that the land that the Army occupies in Poamoho is part of the traditional pu‘uhonua of Kūkaniloko. As a caretaker of Kūkaniloko, he shared the significance of the pu‘uhonua. Kūkaniloko was once the social and economic center of the island for ancestral Hawaiians. It was also an educational center for those who would become land managers of land sections and resources. Kūkaniloko was where ali‘i were selected and consecrated to rule. It was the center of politics, economics, education, and genealogy.

Mr. Lenchanko discussed the significance of Hale‘au‘au,<sup>25</sup> a site with remains of heiau and other cultural resources near Poamoho and included within Schofield Barracks. Hale‘au‘au is a significant part of the pu‘uhonua of Kūkaniloko, according to Mr. Lenchanko. He shared that he and other practitioners have gone on to the military lands and seen the damage done to Hale‘au‘au. Mr. Lenchanko shared that while they were on the property, they had to point out cultural sites, including heiau, to military officials who were not aware of these resources. He shared how one heiau site had military ordnance around it. Mr. Lenchanko has witnessed the military doing target practice near cultural sites on the leased property but says they always claim they are shooting above or around these resources. He explained that Hale‘au‘au is not just a “bath house” as it is commonly translated but represents “au,” a period of time. It is a very significant place and the military using it for target practice is unjust, according to Mr. Lenchanko.

Mr. Lenchanko discussed the importance of water sources in the area. The forested Poamoho area currently leased by the Army is a significant part of the natural watershed. He stated that the area should be protected and restoration efforts should occur so that the water cycle can be restored. The traditional understanding of the water cycle is that if you grow and protect the forests, the rain will come and fill the

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<sup>25</sup> Hale‘au‘au is not within the State-owned land at Poamoho or the broad geographical area.

streams to give life to the land and people. This is not just traditional and cultural, but part of our survival, according to Mr. Lenchanko. If Hawaiians and community members were given access to this land parcel, they would be able to begin restoration efforts including invasive species removal and planting native plants right away. Mr. Lenchanko believes they would also be able to restore cultural resources and practices like lā'au lapa'au and medicinal plants.

Mr. Lenchanko explained how the forest itself is a cultural resource. The plants, trees, birds were given to Hawaiians for them to make use of and implement in their daily lives. He shared that part of the traditional land management for forest reserves like Poamoho would be any activity that sustains the land and the people. Without access to this land, it is difficult for practitioners like himself to understand the needs of the land which has been mismanaged for years. Mr. Lenchanko stated that they know there are cultural resources in that area, but it is impossible for them to know what they are and what is still there without access. There is no way for practitioners to know if there are native plants and resources still in the area because they do not have access.<sup>26</sup> Before the military occupied the land, the Poamoho area was known to have resources for lā'au lapa'au. Traditional medicinal plants were gathered also in the uplands.

### **Cultural Practices and Beliefs**

Mr. Lenchanko shared that the place name "Poamoho" is a variation of "Po'o a mo'o" which alludes to the relationship the people of that place had with mo'o akua. Mo'o were caretakers and guardians of water resources. The Poamoho area had three different caretakers of water sources. The first was menehune, then mo'o, and the third was human beings. This was a progression of management. When the menehune left, the responsibility was passed to the mo'o. When the mo'o left, they gave the responsibility of stewardship to the people. This is how the name "Po'o a mo'o" or "Poamoho" was given to the land as well as the main stream in the area which extends all the way to Kaiaka Bay.

Mr. Lenchanko discussed the shift from ka'ānani'au to the ahupua'a system. After Kamehameha I conquered the islands, the ahupua'a system was solidified for tax purposes. Previously, areas like Poamoho relied on a similar land division system called ka'ānani'au. Mr. Lenchanko said that in his community they still recognize ka'ānani'au and how it gives the families of O'ahu the shared responsibility of maintaining land and resources and supporting genealogical descendants of Kūkaniloko and ali'i. With the ahupua'a system came land division and privatization. But with ka'ānani'au, there is a sense of shared resources and shared responsibility to the land and especially the pu'uhonua.

Mr. Lenchanko mentioned that hunters do not currently have access to the land in Poamoho and would have to trespass in order to practice hunting, lā'au lapa'au, and other traditional activities in the mauka

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<sup>26</sup> See Section 7.2 in main CIA document for a description of access in Poamoho.

Poamoho area.<sup>27</sup> He discussed how traditionally the people lived off the land and accessed parcels like Poamoho that were not generally easy to access or maintain. This challenge was a part of learning to live off the land. Kūpuna would take younger generations to areas like Poamoho to teach them about the resources and pass on the knowledge to the next generation. This requires going into areas that can be more difficult to access and survive in. In order to gather materials for lā'au lapa'au or procure water sources, Hawaiians had to access these difficult areas. It often involved prayer to ask for what was needed and the strength to get there. Mr. Lenchanko explained that he understands this as going into these places with nothing but coming out with spiritual knowledge about what it means to be a practitioner.

Mr. Lenchanko discussed the significance of the surrounding area, Halemano. Halemano makes up one-third of the Līhu'e/Wahiawā land section and is part of the 36,000 acres that makes up the pu'uhonua of Kūkaniloko. Halemano is a kalana significant to Kūkaniloko. His explanation of these land sections and their boundaries reflect a traditional understanding of land use and management that is currently ignored by the State and private landowners. Mr. Lenchanko refers to the significance of the pu'uhonua of Kūkaniloko as evidence of who we are as Hawaiians.

### **Impacts**

Mr. Lenchanko shared that the Army leases around 4,000 acres of land in Poamoho that for the past 25 years has not been used. It is his understanding that the land parcel is difficult for the Army to access and is not suitable for helicopters to fly and land on. He raised the point that if the land, which is part of a traditional and culturally significant pu'uhonua and connected to the watershed, has not been used for 25 years, why should the Army retain the lease? The land could go back to the State and become protected under the Department of Forestry and Wildlife, which would protect the forest and maintain it.

Mr. Lenchanko shared about the issue of watershed management. If the Poamoho lease was returned to the State and became protected, that could focus on watershed restoration and management for the area. The forests need to flourish so the rain can return and streams can flow. Mr. Lenchanko considers this part of his and his community's responsibility. Drinking water is precious and should be protected at all costs. Poamoho is a forested area that is inextricably connected to the watershed of the area.

Mr. Lenchanko discussed access as a major issue that impedes cultural resources and traditional practices in Poamoho. Practitioners do not currently have any customary rights to access that resource. Without access to that land, practitioners have no way of knowing what is there, what the land needs, and how it can benefit the people. They are unable to know exactly what native plants, species, and resources are still there. They cannot access the land for hunting or water resource management. The forest, which he

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<sup>27</sup> See Section 7.2 in main CIA document for a description of access in Poamoho.



considers to be a cultural resource, has become unknown to them. Mr. Lenchanko discussed how kūpuna fought for access to places like Poamoho in order to preserve and adapt cultural traditions and practices. Denied access means the people are unable to foster a traditional comprehension of place. It impacts the people directly in that it impacts their inheritance of cultural knowledge and continuity. Mr. Lenchanko discussed how Hawaiian kūpuna intended for lands like Poamoho to be passed down and maintained by Hawaiians in continuity. The Army retaining the land prevents the ability to carry on this responsibility and access traditional and cultural resources.

### **Mitigation Measures and Recommendations**

Mr. Lenchanko highly recommends that the land retained by the Army be returned to the rightful claimants. He feels that the best option is for the military to return the land, and he discussed the challenge of getting the State to recognize its responsibility in holding trust lands like this and how to manage them properly. Mr. Lenchanko does not think the Army should be able to retain their lease in Poamoho. He is hopeful that the land currently leased by the military in Poamoho will be overseen by DOFAW [Hawai'i Division of Forestry and Wildlife] and that the community will be given access to this area to practice forest and land restoration and rebuild their traditional and cultural practices. Mr. Lenchanko does not feel that DLNR [Hawai'i Department of Land and Natural Resources] has the capacity to oversee this kind of project but hopes that protecting the forest region will help with water resource management. He feels that the land should be considered conservation land and would ideally go back into one of the Hawaiian trusts so that Native Hawaiians are able to protect and conserve it.

If in 2029 the Army continues to retain their lease of Poamoho, Mr. Lenchanko recommends that perpetual access be granted to the people so they can utilize whatever part of the property they need. Part of that need for access is so practitioners can do a cultural analysis of how to use the land and its cultural resources. He would want the Army to do an assessment of the land they use for training that includes and recognizes a Hawaiian perspective on the cultural resources and traditions in the area and grants access to the people. This traditional cultural property analysis (TCP analysis) should be done in the Hawaiian cultural perspective.

Mr. Lenchanko is requesting that the military draft an inventory of all native species, plants, and cultural resources on their properties. Because the people do not have access to these lands,<sup>28</sup> they have the right to know what is still there and how it is being impacted. This will allow the people to respond to the impacts on these resources.

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<sup>28</sup> See Section 7.2 in main CIA document for a description of access in Poamoho.

## D-2.7 MR. CHRISTOPHOR EDWARD OLIVEIRA

The interview with Mr. Oliveira was conducted by Mr. Sproat from Honua Consulting, LLC on June 5, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed retention of the State-owned land at Poamoho and the broad geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

### Cultural Resources

Mr. Oliveira explained that Poamoho is where many water resources originate. Water is a significant cultural resource. He explained that the two main water sources of Waialua come from the Poamoho area.

Mr. Oliveira expressed that the Poamoho area is very sacred given that it was home to the Lo Ali'i. He said that the places in this area are connected to Mā'ilikūkahi and also to Kūkaniloko. The lineages and genealogies that come from Kūkaniloko are sacred and Kūkaniloko itself as well as the surrounding areas are significant for this reason.

### Cultural Practices and Beliefs

Mr. Oliveira discussed the ridge in Poamoho named Pu'u Maili, often called Pu'u Mā'ili today.<sup>29</sup> He explained that "maili" is "mai ili" which means to hug or embrace someone. Mr. Oliveira also named the gulch Mohiākea which is now called Moikeha.<sup>30</sup> Mohi was the patriarch of the Mahi clan of O'ahu. He explained that many genealogies, including those of Kamehameha's lineage, go back to Kila, the ancestor of many great rulers, including O'ahu's Kākuhihewa. Kila was chosen by Moikeha to get La'amaikahiki, who brought the Hāwea drums to Kūkaniloko. These drums were pounded during the birth of Mā'ilikūkahi at Kūkaniloko. Mr. Oliveira explained that Mā'ilikūkahi was of high rank, the 'aiwohi kūkahi rank.

He shared about how Mā'ilikūkahi's army was surrounded at Pu'u Kaua by Waikakalaua Gulch.<sup>31</sup> These traditions are connected to the Poamoho area.

Mr. Oliveira shared about how Kamehameha Nui tried to get his son, Kauikeaouli, to be born at Kūkaniloko in order to establish a right to rule and due to the sacredness of Kūkaniloko.

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<sup>29</sup> Pu'u Maili is not within the State-owned land at Poamoho or the broad geographical area.

<sup>30</sup> Mohiākea is not within the State-owned land at Poamoho or the broad geographical area.

<sup>31</sup> Waikakalaua Gulch is not within the State-owned land at Poamoho or the broad geographical area.

He named kilo, or kilokilo, as a tradition connected to the Poamoho area. Kilo is practiced in the area to learn about the seasons and changing of times based on keen environmental observations.

Mr. Oliveira explained the place name “Poamoho” to be “Pō a Moho” or the “night of Kāmohoali’i.” This connects Poamoho to “Helemanō.” Manō is shark and Kāmohoali’i is a shark god. This area has connections to sharks and Kāmohoali’i.

He explained that Poamoho and the surrounding area was the land of the Lo Ali’i. These were the “bloodline ali’i” that had high rank on O’ahu and throughout Hawai’i. They did not have to prostrate themselves to other ali’i.

Mr. Oliveira shared some significant place names in the broad geographical area of the Poamoho project area, including Hale’au’au, Mauna Ka’ala, Pu’u Maili, Poamoho, Pa’ala’a, Helemanō, Kolekole.<sup>32</sup> He named a temple Kalāhiki located further down in Waialua. He also discussed Līhu’e, a traditional land section that included Poamoho and Wahiawā.<sup>33</sup> All of these places are connected to each other through traditions and land sections. These place names have various interpretations that allude to the significance of the place. Mr. Oliveira explained that Hale’au’au refers to “house of the sound.” When people would go there to chant, it would resound like an amphitheater. Hale’au’au is home to heiau and other significant sites.

### **Impacts**

Mr. Oliveira named Hale’au’au as a specific place and cultural resources impacted by the Army’s retention of the lands in this area.<sup>34</sup> Mr. Oliveira asserts that Hale’au’au is bombed and filled with uranium and other dangerous materials, but it is culturally significant and that this place is home to heiau and other significant sites.

Mr. Oliveria expressed that he feels the most important resource that would be impacted by the Army’s retention of these lands is the people. Being withheld from accessing sacred lands impacts the people and cultural practitioners. It prevents them from accessing sacred and significant sites to carry out various traditions including worship. He feels these lands belong to the people. Mr. Oliveira explained that these lands are dedicated to the god Kāne. When the Army uses these lands to train people to kill, they are further desecrating the land, its people, and the ancestral Hawaiian religion. Mr. Oliveira stated, “ua kapu

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<sup>32</sup> Hale’au’au, Mauna Ka’ala, Pu’u Maili, and Kolekole are not within the State-owned land at Poamoho or the broad geographical area.

<sup>33</sup> Līhu’e is not within the State-owned land at Poamoho or the broad geographical area.

<sup>34</sup> Hale’au’au is not within the State-owned land at Poamoho and so is not part of the potential lease retention addressed by this CIA.

ke ola na Kāne” explaining that all life is sacred to Kāne. He also explained how Mā’ilikūkahi had a decree of not killing in the area.

### **Mitigation Measures and Recommendations**

Mr. Oliveira stated that to mitigate impacts to cultural resources and traditions the Army should immediately stop the training and bombing. The Army should clean up the land and restore it. He feels that the land should be returned to the people, not the State. The land should be put in trust for the Hawaiian people, through OHA or some other way.

As a best practice, Mr. Oliveira recommends that the Army find a way to accommodate the people’s needs to access these lands beyond means of worship and cultural practices. The land is an important resource to the people, and it is not always for worship or specific practices, but to exist and be with the land of their ancestors.

### D-3 MAKUA MILITARY RESERVATION (MMR)

Specific individuals with known cultural or historical expertise of the MMR project area were contacted by phone to request an interview. One-on-one interviews were conducted with ten individuals associated with the MMR project area (Table D-3). Summaries of each interview are provided in the sections below. All summaries are interviewee statements and opinions and do not reflect the statements or opinions of the authors of the report. Biographical information for each interviewee is provided in Section 2.2.2.1 in the main CIA document. At the request of the Army, footnotes were added to some interviews to provide geographic notations and, in some cases, the Army’s perspective on the topic discussed. Some of the cultural resources, practices, and beliefs mentioned by interviewees are located outside of the project area or the broad geographical area and are not discussed in the main body of the CIA.

**Table D-3. Individuals Interviewed for MMR Project Area**

INTERVIEWEE	INTERVIEW TYPE
Mr. William J. Ailā	Telephone
Mr. Peter Apo	Telephone
Mr. (Norman) Mana Kaleilani Cáceres	Telephone
Mr. Eric Enos	Telephone
Mr. (Nathan) Keola Grace	Telephone
Mr. Neil J.K. Hannahs	In person
Mr. Allen Hoe	Telephone
Mr. Kyle Kajihiro	Telephone
Mr. Thomas Lenchanko	Telephone
Mr. Christophor Edward Oliveira	Telephone

#### D-3.1 MR. WILLIAM J. AILĀ

The interview with Mr. William J. Ailā was conducted by Mr. Sproat from Honua Consulting, LLC on July 6, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed retention of the State-owned land at MMR and the broad geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

## Cultural Resources

Mr. Ailā said one important resource is a spring, which has been covered up by military infrastructure but then found again after a fire.<sup>35</sup> He added that the spring exists today and has water in it. Additionally, in regard to water resources, Mr. Ailā noted that Mākua Stream used to be perennial. In the 1970s, Mr. Ailā recounted a story of catching ‘o‘opu in the stream – which even at the time was unbelievable to many. He hasn’t seen any since.

Mr. Ailā said there are an assortment of native plants, including maile, ‘ōhi‘a ‘ai, and native ferns in the back of the valley; he also mentioned there are orange trees from the original kuleana lands and many more critically endangered native plants in the area, as well as a snail enclosure.<sup>36</sup> According to Mr. Ailā, hunters also report kauila further back in the valley. He also explained that there are pueo in the area.

Regarding ancient sites, Mr. Ailā noted that there are at least three heiau in the lower portion of the valley. He said one of the heiau is where the Army stores the equipment to cut the grass. Mr. Ailā also said this area is associated with the mo‘o, La‘ila‘i.

Mr. Ailā noted how rich the ocean waters of Mākua were, with many schools of fish and even pelagic fish that helped feed the inhabitants of Mākua. He mentioned there is also limu along certain parts of the shoreline.

When asked about anything else significant about the area to share, Mr. Ailā shared the story of Samuel Andrews, who ran away from Honolulu. He was a friend of Kamehameha III and fell in love with a Hawaiian woman. He received the original lease for Mākua Valley and was credited with establishing the first ranch in the area. Samuel Andrews ascribed his success to finding a doll in Kāneana Cave, which Mr. Ailā says told him, “If you take care of me, I’ll take care of you.” At some point, the doll was taken from him.

## Cultural Practices and Beliefs

Mr. Ailā noted that they have been doing Makahiki ceremonies since 2001 in each ahupua‘a in the area. He said the purpose of these ceremonies is to restore positive mana and energy across the ahupua‘a. Mr. Ailā said for Makahiki, they are restricted to the front part of the valleys. He mentioned that when Mālama Mākua entered into a settlement agreement around 2001, they were allowed in the back of the valley.

Regarding practices that occurred before the Army leased Mākua, Mr. Ailā noted that his uncle’s father was the pastor, and he went inland to collect thatching material and wood to construct the church. He

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<sup>35</sup> Interviewee did not specify exact location of spring.

<sup>36</sup> Interviewee did not specify exact location, and the Army does not have records of these resources within the State-owned land at MMR.

said people also buried their babies' placentas in the mauka areas. Mr. Ailā noted there are also stories of family 'aumakua in the form of a shark along the shoreline. According to Mr. Ailā, gathering maile and other plants also occurs in the valley today. He added that pig hunting remains a very common traditional practice in the area.

Mr. Ailā noted that things are getting harder due to military objections in recent years. He said if there is a good commander, the valley may be a little more open; if it is a bad commander, Mr. Ailā said it's much harder to get access to the valley.

### **Impacts**

Mr. Ailā asked that this statement be placed in all caps:

THE QUESTION THAT THE ARMY IS ASKING IS INCORRECT. THE QUESTION SHOULD NOT BE, "WHAT IS THE IMPACT OF THE RETENTION OF THESE LANDS?". THE QUESTION IN THE EIS SHOULD BE, "WHAT IS THE IMPACT OF THE CONTINUED OCCUPATION AND USE OF MĀKUA FOR NEARLY 90 YEARS? WHAT IS THE IMPACT ON PAST, PRESENT, AND FUTURE PEOPLE, AND THE 'ĀINA AND THE KAI?"

Mr. Ailā wanted to make it clear that the question being asked in the EIS is the wrong question. The question should not be, what is the impact of retaining Mākua Valley? The question instead should be "What is the impact of continuing to occupy Mākua Valley for nearly 90 years, on the people, the animals, the plants, the soil, and the groundwater?" Mr. Ailā explained that it has been proven that the Army does not need Mākua Valley. He also noted that there are proven negative impacts outside the boundary ("magical fence") of the training lands. These impacts will continue should the Army retain the land.

Mr. Ailā said not asking this question properly should be a violation of NEPA and HEPA. He added that you cannot so narrowly tailor the question to ensure a desired outcome.

Mr. Ailā noted that the retention of Mākua is a slap in the face to the families of Mākua, such as his uncle, who was directed at gunpoint to move all of his things out of Mākua in an hour. According to Mr. Ailā, originally, the families living in Mākua Valley were told they could return to the valley after the war ended. He said the families were never allowed to come back, and the land was condemned. Mr. Ailā thinks there is no justification for the military to keep Mākua Valley. He also asserted that they have had limited trainings and have not conducted live-fire training for more than 15 years.

One current impact Mr. Ailā noted is the use of the area for unmanned arial trainings. He said the Federal Aviation Administration (FAA) will tell fishermen who are engaged in cultural practices along the shoreline and beaches that they have to leave. Mr. Ailā mentioned the military also prevents access to heiau (such as Site -4546) in the area and prevent the presentation of certain types of ho'okupu on the heiau.

Further, Mr. Ailā noted that the boundary for the training area doesn't denote a lack of impact. He cited the unmanned arial trainings (noted previously), but also that munitions are found outside the boundary as well (on the State Park side). He said these munitions will also move downstream during heavy rains and pose contamination risks to groundwater and soil.

Mr. Ailā also explained that there used to be a landfill in Mākua Valley. They discovered this by going through the bibliography of the first Environmental Assessment conducted in the valley and found a reference to this. At first, the military denied the existence of the landfill, but later released information that the landfill had been cleaned up.

### **Mitigation Measures and Recommendations**

Mr. Ailā said that the military should not continue to possess Mākua Valley and that it should be returned. Further, Mr. Ailā said the money to remediate the valley should be put into an endowment for local non-profit organizations. He described an estimate he was familiar with that \$10 million per year (up to \$100 million) would be needed to remediate and restore Mākua Valley within 50 years. Mr. Ailā said the recovery plan includes hiring and training local people to manage the restoration, and also includes an education component. Mr. Ailā does not agree with allowing the Army to remediate the land. He said this has been tried in other places, and it never works.

Overall, Mr. Ailā says he does not have any recommendations should the Army retain Mākua Valley.

### **D-3.2 MR. PETER APO**

The interview with Mr. Apo was conducted by Mr. Sproat from Honua Consulting, LLC on June 15, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed retention of the State-owned land at MMR and the broad geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

### **Cultural Resources**

Mr. Apo used to have a list of sites located in Mākua Valley; however, it has been a long time and he no longer has the list. Mr. Apo could not recall specific sites in the valley during the time of this interview; but he acknowledged that there were multiple sites that have to do with "wahi pana" ("sacred lands"), customs and traditions that had to do with how the land was treated, and in the ahupua'a system how the land was assigned. He also noted that the Army was good in responding to any issues and in how they managed the valley.



## **Cultural Practices and Beliefs**

Mr. Apo provided no knowledge of any cultural practices and beliefs associated with the State-owned land at MMR or the broad geographical area.

## **Impacts**

Mr. Apo believes that the valley impacts the entire coast, and efforts need to be done to identify appropriate activities for the entire coast, not only Mākua. He provided an example of inappropriate activities regarding a proposed water invasion training by a new Army commander that would have occurred a couple weeks after “Brother Iz” ashes were scattered in the same area. Mr. Apo said that fortunately the training exercise was not permitted by the Governor. This is an example in which Mr. Apo mentioned that the State needs to review how Mākua affects the entire coastline.

Mr. Apo noted that there is an interesting aspect regarding the training ground at the end of the road, since for states to qualify for financial assistance in highways it is required that highways lead some place. He said one of the reasons the State receives a lot of federal money in Wai‘anae is because of Mākua, since it is a military facility.

Mr. Apo pointed out that Mākua has a wide range of impacts. He added there needs to be a higher level of reviewing impacts beyond Mākua.

## **Mitigation Measures and Recommendations**

Mr. Apo’s recommendation is to review compensation associated with Mākua, including 1. Negotiating a realistic lease; 2. Maintaining a high level of stewardship; and 3. Supporting the Army in retaining the land for the training site.

Mr. Apo believes that high-level dialogue must commence regarding the land retention by the Army. He said the entire valley has moved into 100 percent vegetation conversion since the 1970s. Mr. Apo mentioned that it would be a good idea if the new lease included a provision to bring back native plants that used to be there.

Mr. Apo added that cultural access to the valley is important.

Through his Mākua experiences, Mr. Apo came away after several years of working on the issue that brought him to the perspective he expressed during the interview, that he believes Mākua should not be returned to the State. Mr. Apo mentioned that if anyone would review the records on what it would take (cost) to make the place safe for public use, it would be astronomical. He added that in addition to the cost, the area is dangerous. Mr. Apo believes there needs to be some other solutions or compensation for the degradation of Mākua.

Mr. Apo noted through his experience in Mākua, that the Army has done a pretty good job maintaining the cultural sites in the valley. He asserted that if anyone paid attention to the Army's maintenance of those sites, they would note that the Army has done a better job maintaining sites than the State would have done. The Army has been very attentive to the needs of the community, and in his view, the Army is doing a good job in protecting cultural sites and conducting research.

Mr. Apo believes that these lands should not/cannot be returned due to the potential dangers posed by possible explosives materials. However, Mr. Apo supports any initiative for compensation (all options) for the use of the land, and that the military continue its priority to care for and maintain the "wahi pana."

### **D-3.3 MR. (NORMAN) MANA KALEILANI CÁCERES**

The interview with Mr. Cáceres was conducted by Mr. Sproat from Honua Consulting, LLC on June 13, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed retention of the State-owned land at MMR and the broad geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

#### **Cultural Resources**

Mr. Cáceres discussed how the valley as a whole is a unique and significant cultural resource. He shared that during his time in the valley as a cultural monitor, he learned that Mākua Valley contains many cultural resources including natural springs, ki'i (petroglyphs), ahu (shrines), native plants including maile, as well as significant cultural sites. He mentioned how the group, Mālama Mākua, tries to use their community days to take people to significant sites in Mākua since access to these cultural resources has been impeded for years.

#### **Cultural Practices and Beliefs**

Mr. Cáceres named a few resources connected to traditional practices including freshwater sources, ki'i, and other cultural structures like ahu. He named maile as a significant resource in the valley connected to lei making and also shared that he knows of hunters who access the lands around Mākua to hunt. One tradition connected to the area is gathering medicinal plants, which is currently impossible to do given the lack of access to the valley.<sup>37</sup>

#### **Impacts**

Mr. Cáceres expressed that the entire valley is a cultural resource, as well as the specific resources within the valley, and these will continue to be impacted should the military retain their lease of the land. He

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<sup>37</sup> See Section 7.3 in main CIA document for a description of access in MMR.

discussed how the nature of the military training that has happened in Mākua has had adverse impacts on the valley as a whole and continues to impact the valley. He mentioned how the ammunition and weaponry used in training impacts the environment, including the land, water sources, and the ocean.

### **Mitigation Measures and Recommendations**

Mr. Cáceres shared that he does not see any way that the impacts to the valley could be avoided should the military retain their lease, being that they intend to use Mākua Valley for training. Live-fire training has a huge impact to the valley<sup>38</sup> and continuing to use the valley for training will impact this significant resource. He expressed how the military needs to do a better job at cleaning up the remaining munitions in the area. Mr. Cáceres suggested that the only way to mitigate the impacts is to not renew the military's lease and for the military to give more attention to their efforts to clean up and restore the valley.

Mr. Cáceres shared that if the military's lease is renewed in 2029, he thinks that one of the conditions should be that no training occurs in the valley and the military's efforts are strictly geared towards clean up and providing access for the community.

### **D-3.4 MR. ERIC ENOS**

The interview with Mr. Eric Enos was conducted by Mr. Sproat from Honua Consulting, LLC on June 12, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed retention of the State-owned land at MMR and the broad geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

### **Cultural Resources**

Mr. Enos discussed water and the watersheds in the mountains as a significant cultural resource in Mākua. The valley is part of this valuable watershed and water is a resource they work to protect in addition to the actual valley. Mākua Valley houses different springs and water sources that have been impacted by the Army's occupation of the valley. These impacts have an effect on the near shore cultural resources, extending out to sea. When the inland water sources are altered or impacted, it has an effect on the native species and their habitat near shore. Ocean resources, including limu and fish, are culturally significant in this area.

Within the valley there are many cultural sites as well as native species. Eric shared that accessing these sites and resources is difficult given the military's occupation of the land.

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<sup>38</sup> Authors note that the last occurrence of live-fire training within MMR was in 2003 (followed by total suspension in 2004).

## **Cultural Practices and Beliefs**

Mr. Enos discussed how their organization has been able to hold Makahiki ceremonies in Mākua Valley for the past 18 or so years with the consent decree of the military. They hold Makahiki opening and closing ceremonies in Mākua annually.

Ka'ala Farm works to uphold traditional practices in the area including kalo farming. They also work with Mālama Mākua to protect the valley and the surrounding areas, including the mountains and watersheds. The watersheds start in the mountains in the back of the valley and feed into the larger system that they rely on for kalo farming and other traditional practices. Mr. Enos discussed how native plant species are important for water retention and prevent erosion and runoff that impact ocean resources.

Mr. Enos shared significant place names in the Mākua area including Ko'iahi, Kahanahāiki, Kuaokalā, and Pāhole. Ko'iahi and Kahanahāiki are the different parts of the valley, Kuaokalā is the ridgeline of Ka'ala, and Pāhole is the name of the watershed on top of Ka'ala.<sup>39</sup>

Mr. Enos discussed how fishing in the waters outside of Mākua Valley is part of their traditional and customary practices. He described these coastlines as an active recreation area where people practice fishing and other ocean resource practices. Mr. Enos said that the coast outside of Mākua is one of the best fishing sites in the moku (district). Mākua Beach has a long coastline making it an ideal fishing site. Families have been using this area for fishing for generations. He explained that Mākua was once a fishing village, and it is connected to the deep-sea fishery outside of Ka'ena. Mr. Enos said that Mākua is the most active deep-sea fishery on the island of O'ahu. He explained that one of the reasons Wai'anae boat harbor is so productive is due to its close proximity to this deep-sea fishery. One of the reasons that Ka'ena has such a rich deep-sea fishery is the upwelling of fresh water that creates ideal conditions for larger fish. At one time the coastlines in the area were known for being productive with ahi, opelu, akule, and larger migratory species.

Mr. Enos shared that Mākua is connected to certain creation stories, like Kūla'ila'i. Some of the springs and water sources within Mākua are connected to Kūla'ila'i and these traditions. There are several sites within the valley and along the coast connected to these traditions as well.<sup>40</sup>

## **Impacts**

Mr. Enos shared that the active firing and burning that occurs in Mākua gives off waste that goes into the air and soil and eventually the ocean, impacting significant ocean resources. They have wanted to get

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<sup>39</sup> Pāhole is not within the State-owned land at MMR or the broad geographical area.

<sup>40</sup> Interviewee did not specify exact location of the sites.

water quality testing done in the waters outside of Mākua to determine if cultural and subsistence resources, like fish and limu, are being impacted by the active firing and burning that occurs. Mr. Enos shared that what happens on the land happens to the ocean. He also discussed how water resources in the valley have been impacted by the military's use of the land. Mr. Enos has seen the water coming out of Mākua flow right into the ocean.

He shared that he is not sure what the Army would retain the lands in Mākua for or what plans they have to justify continued retention. There is currently no active live-fire training happening in Mākua, and he questions what other kind of training the military needs Mākua for. Further retention of the land would undoubtedly impact cultural resources and traditional practices in Mākua, but the community needs to be made aware of what the military intends to use Mākua for in order to fully understand these impacts.

Mr. Enos feels that the Army should work to clean up the land and restore it to its original state so that it is safe to access again. He mentioned that the community will need to plan how they can best perpetuate and continue cultural practices in Mākua once the military leaves and restores the land.

### **Mitigation Measures and Recommendations**

Mr. Enos expressed that the community should be made aware of any new plans the military has for Mākua, including what kind of new training they might be using the valley for, should they retain the land. He does not feel that the military should retain the land at Mākua. He also discussed how the military has the responsibility to clean up the valley and fully restore it. They cannot just walk away in 2029 and throw money at the situation. It is going to take a lot of technology and work to restore and rehabilitate the land. Mr. Enos said that the Army needs to be held accountable for polluting this land and should take the lead on restoring the land they have been occupying. He also shared that the military should have a part in the conservation and protection of Mākua once their lease ends. The military has more resources than the State does to ensure that Mākua is restored and protected. He mentioned that the environmental and conservation arm of the military could continue to play a role in the conservation and restoration of Mākua.

Mr. Enos expressed that certain things which already exist in Mākua from the military, like fencing, can be utilized by the community once they leave. Fencing is important for practices like farming and ranching and these structures already exist on site. The existing infrastructure on site can be utilized for education, science, technology, and community centers. This infrastructure can be used for cultural activities, like storing canoes as well as educational activities.

### **D-3.5 MR. (NATHAN) KEOLA GRACE**

The interview with Mr. Grace was conducted by Mr. Sproat from Honua Consulting, LLC on May 11, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed retention of the State-owned land at MMR and the broad geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

#### **Cultural Resources**

Mr. Grace mentioned Mākua Cave as a significant cultural resource in Mākua.

#### **Cultural Practices and Beliefs**

Mr. Grace discussed how surfing was a tradition connected to Mākua, as well as farming and even ranching.

#### **Impacts**

Mr. Grace was not aware of any specific impacts to cultural resources or traditions and beliefs in the area.

#### **Mitigation Measures and Recommendations**

Mr. Grace recommends that the Army work closely with kūpuna and cultural practitioners in the area on how best to use the land in Mākua and how to mālama ‘āina.

### **D-3.6 MR. NEIL J.K. HANNAHS**

The interview with Mr. Hannahs was conducted by Mr. Sproat from Honua Consulting, LLC on June 20, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed retention of the State-owned land at MMR and the broad geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

#### **Cultural Resources**

Mr. Hannahs noted that when growing up, he did not have many experiences inland (within the MMR project area). He stated that in the ocean, fish and limu were important cultural resources. Mr. Hannahs considers rain and wind as cultural resources and says that “you are shaped by your environment.”

#### **Cultural Practices and Beliefs**

During the interview, Mr. Hannahs expressed that it is limiting to think of the MMR project area in terms of a single valley. He said there are many valleys, and as a result you must view it in its entire context. Mr. Hannahs talked about a Native Hawaiian viewpoint which does not view the land as merely terrestrial,

but also includes the ocean and the heavens. He noted the symbiotic relationship between these realms. Mr. Hannahs added that the presence of trees in the uplands stimulate clouds in the atmosphere to deposit rain on the land which then recharges the aquifer and creates streams that carry nutrient rich water to the nearshore where it catalyzes life in the ocean. He also said these aquatic resources may be birthed and nursed in one area and migrate to other areas as they mature where they are gathered.

### **Impacts**

Mr. Hannahs noted that because all environments are connected, upstream effects will impact the downstream environment. He expressed the belief that land ownership and zoning in and of themselves are not as important as how lands are used and stewarded. Mr. Hannahs asked: “How will the land be impacted by training activities and what is the Army’s sense of duty to reciprocate for that privilege?” He asserted that if the use is destructive (bombing, live-fire training, etc.), the price to pay will be higher. Mr. Hannahs also added that noise is an impact, as well.

### **Mitigation Measures and Recommendations**

Mr. Hannahs believes mitigating negative impacts is important. He believes negative impacts could include noise, chemical residue, bombing, live-fire training, etc. Regarding impacts to traditions and customs, Mr. Hannahs believes permitting the Army to retain the lands requires another generation or more to wait through the lease cycle. He asked: “If practitioners don’t have unfettered access, how do they cultivate pilina [connection] to the place? Does the military know how to relate to the land and people here?” Mr. Hannahs said that should the military retain the land, the military should view the relationship to the land and community holistically.

Mr. Hannahs said that he hopes Mākua is managed to optimize its role in support of vital ecosystem services. He believes there needs to be native forest trees and understory in the mauka areas to recharge aquifers. He also said we should constantly ask ourselves: are our actions helping the environment and fostering the health of the land and helping it to perform in a way that fulfills its kuleana?

### **D-3.7 MR. ALLEN HOE**

The interview with Mr. Hoe was conducted by Mr. Sproat from Honua Consulting, LLC on June 14, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed retention of the State-owned land at MMR and the broad geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

### **Cultural Resources**

Mr. Hoe noted the cave associated with Mākua is considered an important cultural resource. He also knows about the families that had lived in Mākua for numerous generations before the lands were taken by the military.

### **Cultural Practices and Beliefs**

Mr. Hoe explained that he does not have any familial or personal knowledge regarding the cultural practices and beliefs associated with Mākua Valley.

### **Impacts**

Mr. Hoe is not personally aware of any cultural resources, traditions, or customs that might be impacted from the project; however, he noted that many individuals more familiar with the area have raised issues of impact to resources, traditions, and customs.

### **Mitigation Measures and Recommendations**

Mr. Hoe explained that he understands the land is still usable for the military. He does not believe there is a critical or military need for continued live-fire training.<sup>41</sup> Mr. Hoe also explained that he believes the terrain could be better used for physical training for the military and athletes. Mr. Hoe recommended that the military clean up the land from previous live-fire trainings.

#### **D-3.8 MR. KYLE KAJIHIRO**

The interview with Mr. Kajihiro was conducted by Mr. Sproat from Honua Consulting, LLC on June 15, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed retention of the State-owned land at MMR and the broad geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

### **Cultural Resources**

Some of the cultural resources that Mr. Kajihiro identified in his interview include the following: Ukanipō Heiau, which is on the Ka'ena side of Mākua; Kumuakuopio Heiau on the eastern side of the valley; a site that may have been heavily disturbed near the center part of Mākua that Mr. Kajihiro could not recall the name of; Kāneana Cave, which went all the way down to the sea prior to the road cut along with many stories relating to Maui Hina and a shark deity that are associated with that sea cave; Mailelauli'i, which was very well known and documented in stories from Ko'iahi Gulch; and a punawai (natural fresh water

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<sup>41</sup> Authors note that the last occurrence of live-fire training within MMR was in 2003 (followed by total suspension in 2004).



spring) documented by Marion Kelly in her 1977 report and rediscovered by kupuna Walter Kamana on a cultural access tour. Mr. Kajihiro mentioned there are petroglyphs in the backside of the valley; however, restricted access to these areas have made it challenging to know exactly where these sites are. He said there are also noted ko'a along the shoreline, but he is unaware of their exact location.

According to Mr. Kajihiro, contemporary cultural sites include three ahu inside the military installation constructed by Hui Mālama o Mākua for Makahiki ceremonies. He mentioned these are located in Kahanahāiki, Mākua, and Ko'iahi. Mr. Kajihiro also said a paepae [stone platform] called "Papahonua" was built under the direction of Mr. Glen Kila and Mr. Koa Mana in the gulch near the Mākua Cemetery. He mentioned another ahu named "Kanaloa" was built on the beach side near the center of the valley by Mr. William Ailā, Mr. Eric Enos, Mr. Atwood Makanani, and other community members at the suggestion of Auntie Frenchy DeSoto. Mr. Kajihiro said there is another structure/cultural landscape built by Ms. Leandra Wai on the western end, ocean side of Mākua, which has been named "Papa Waiola".

### **Cultural Practices and Beliefs**

During the interview, Mr. Kajihiro recalled that the Mākua Valley was known historically as an important fishing site, with the area offshore being close to the deep drop off of Ka'ena, which is a very robust fishing area. He spoke to kūpuna from the area who were evicted from Mākua and recalled the richness of the place. Mr. Kajihiro said he has also spoken to kūpuna who have lineal ties to Mākua Valley and who speak of family burials within the valley. During the interview, Mr. Kajihiro recounted that they believe they do not have access to these burials due to the military's occupation of the valley. According to Mr. Kajihiro, Mālama o Mākua has monthly access to only certain sites in the valley and that cultural practices are constrained. Mr. Kajihiro said Mālama o Mākua have not been allowed to repair sites, give certain types of ho'okupu, remove invasive plants, or plant native species, Hawaiian crops, and medicinal plants.

Mr. Kajihiro also shared mo'olelo associated with the MMR project area, specifically of the shark god who resided in Kāneana Cave, within the MMR project area. Mr. Kajihiro recounted that when there were rains and the sea was rough, the shark god would come down from the cave into the ocean and rendezvous with a mo'owahine from Ko'iahi. When the heavy rains filled the muliwai, it would turn the river water green and enter the ocean near a stone called Kūla'ila'i. The entrance of the river water into the ocean would cause rough, turbulent seas that were believed to be the result of their romantic rendezvous and lovemaking.

Another mo'olelo shared by Mr. Kajihiro was from a collection of mo'olelo collected by Kepā Maly of Hi'iaka and Lohi'au traveling from Kaua'i and landing at Mākua. Hi'iaka would chant a greeting to many of the landscape features in the area including pōhaku features. These features were personified by Hi'iaka as akua or family members as she chanted to these features. At a swimming area known as Kilauea located

between Keawa'ula and Mākua, a young woman from Mākua dove into the ocean and struck the rock that mysteriously appeared and killed her. When Hi'iaika saw this woman, she resuscitated this woman on the shores of Mākua Beach with a chant to Kanaloa and Kāne to bring life back to the woman. Hi'iaika told the parents of this woman that the plants or lā'au lapa'au in Mākua Valley could be used medicinally to heal the woman. Mr. Kajihiro continued the mo'olelo but sharing that this stone which initially killed the woman was a kupua [demigod] that had become evil; its name was Pōhakuloa. Pōhakuloa was jealous of the girl because she had rejected his romantic affections. Knowing that Pōhakuloa could continue to harm the people and area of Mākua, Hi'iaika entered the ocean to battle this kupua. Pōhakuloa turned himself into the form of a shark. During the battle, a waterspout shot out of the water over Kuaokalā, indicating that Hi'iaika successfully defeated Pōhakuloa. The grateful community of Mākua celebrated Hi'iaika's success with a huge feast. Mr. Kajihiro asserted that this story suggests the abundance of resources in Mākua at that time with ample food and labor. He also noted that Mākua was known as a place of healing with the abundance of lā'au lapa'au in the valley.

### **Impacts**

When asked about potential impacts from the Proposed Action, Mr. Kajihiro spoke of the negative impacts that the military has had over the cultural resources, landscape, and access to ancient cultural sites due to their occupation of Mākua. He said the negative impacts include devastation of native plants and natural resources, restricted and unobtainable access to iwi kūpuna and wahi kapu, unexploded ordnance, fires, and erosion of the valley.

### **Mitigation Measures and Recommendations**

Mr. Kajihiro recommends that in preparation for the expiration of the lease in 2029, the land should be cleaned up to the condition prior to the military occupation of the valley and then returned to the people of Mākua. He said clean up should be financed by the military but led by the community. Mr. Kajihiro does not recommend the Army retain the land past 2029; instead, he asserted that Mākua should be used as a center for cultural practice and learning and as a living laboratory for environmental restoration. He believes the concerns for Mākua should not be "What can the military do better to retain this land?"; the question should be, "What does Mākua need?" and "What is the pono thing to do consistent with kuleana to mālama 'āina?" Mr. Kajihiro asserted that the EIS is guided by the wrong question, especially given that the lands in question are Hawaiian trust lands zoned for conservation. Mr. Kajihiro believes the EIS should study what actions are needed to restore the ecology and cultural resources of Mākua consistent with the State's trust obligation to mālama 'āina.

### **D-3.9 MR. THOMAS LENCHANKO**

The interview with Mr. Lenchanko was conducted by Mr. Sproat and Dr. Watson-Sproat from Honua Consulting, LLC on May 10, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed retention of the State-owned land at MMR and the broad geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

#### **Cultural Resources**

Due to lack of access,<sup>42</sup> Mr. Lenchanko is unsure of what cultural resources remain in Mākua. He recognizes Mākua Valley as a significant cultural property and part of the kaʻānaniʻau system. Mr. Lenchanko discussed how there are several heiau in Mākua Valley and that the valley carries significant places like Koʻiahi where the famous maile lau liʻi once grew. He also discussed how there used to be rich animal life in the valley as well.

#### **Cultural Practices and Beliefs**

Mr. Lenchanko shared that he was taught that Mākua is the “vein of creation.” It is a place that connects us back to our origins. He discussed a “connection to invisible land” in reference to Hawaiians maintaining a connection to their ancestral lands. This makes land a way to connect to ancestors long passed.

#### **Impacts**

Mr. Lenchanko discussed how access to land impacts cultural resources and traditional practices. Military reservations prevent people from accessing resources regularly. In Mākua, it is dangerous because there are explosives still on the property, making it much more difficult for people to access this place as a traditional cultural property. Practitioners and descendants are unable to access this land to carry out their traditions and make connections to the land and their ancestors. The military has greatly impacted this significant land and retention of their lease makes it impossible for the people to reclaim and steward it. He referred to this as a war crime committed by the military. To this day the people are unable to determine how much of the land has been harmed and impacted and how they can restore it. This interferes with their inheritance to the shared responsibility of land stewardship. The military attempts to grant supervised access, but this process is complicated and still prevents the people from fulfilling their responsibility to this land.

Mr. Lenchanko expressed how the military has caused great harm to Mākua. He shared how he has witnessed military target and live-fire practices that have gone over the mountain range right up to cultural sites. According to Mr. Lenchanko, one munitions round that struck a heiau looked like it came

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<sup>42</sup> See Section 7.3 in main CIA document for a description of access in MMR.

from over the mountain from MMR. He says the bombing and targeting of the land have undoubtedly impacted cultural resources and prevents any traditional cultural practices from occurring in the valley. The continued military retention of this land will further impact the cultural resources and traditional practices.

### **Mitigation Measures and Recommendations**

Mr. Lenchanko feels that the military has no place in Mākua and that the land should be returned. He stated that if they need land for national security, there is plenty of land elsewhere in America. Mr. Lenchanko expressed that cultural practitioners and Mākua families should be given back perpetual access to their land.

He is requesting that the military draft an inventory of all native species, plants, and cultural resources on their properties. Since the people do not have access to these lands, they have the right to know what is still there and how it is being impacted. This will allow the people to respond to the impacts on these resources.

### **D-3.10 MR. CHRISTOPHOR EDWARD OLIVEIRA**

The interview with Mr. Oliveira was conducted by Mr. Sproat from Honua Consulting, LLC on June 5, 2022. The objective of the interview was to gather information about cultural resources, practices, and beliefs that may be affected by the proposed retention of the State-owned land at MMR and the broad geographical area. The interviewee also had the opportunity to share potential impacts and mitigation recommendations for the project area.

### **Cultural Resources**

Mr. Oliveira shared that the entire valley is a cultural resource including intangible resources like sunrise and sunset times, observation of seasonal changes, and the entire cultural landscape.

Mr. Oliveira shared that when iwi kūpuna were found near shore, the lineal descendants wanted to have the sand that contained the iwi moved to Mākua Valley. They are still working to see this effort through. Working with the Army on this effort has been difficult, according to Mr. Oliveira. Given its cultural significance, Mākua has become home to burials.<sup>43</sup> Mr. Oliveira shared that his kūpuna fought the Army in the 1980s over disturbing iwi kūpuna in Mākua. These burials are near the graveyard and the church. Mr. Oliveira also named Kuihelani, Kalaeopa’akai, and Po’ohuna as burial grounds and sites connected to iwi kūpuna.

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<sup>43</sup> The interviewee did not provide additional information about what he meant by “Mākua has become home to burials.”

Maile lau li'i and loulou (fan palm, *Pritchardia* spp.) are significant plants connected to Mākua Valley. These resources are famed in chants and traditions connected to Mākua.

Mr. Oliveira shared that because of the state of the land in Mākua, there is no way for them to know of other cultural resources in the valley that still exist today. Until the valley is cleaned up, they have no way of truly knowing what resources continue to exist there.

### **Cultural Practices and Beliefs**

Mr. Oliveira shared that the three valleys, Kahanahāiki, Ko'iahi, and Mākua, were called "Nā Mākua" collectively. He was taught this by his kūpuna. The area from Mākaha to Ka'ena was known as Kānehunamoku. La'ihau, Kanipō, Kumuakuopio are all names of temples in the area. Mr. Oliveira shared that his 'ohana has been working to restore traditional place names in this area that have been passed down from his past 'ohana. Once homesteads were created, the place names and their stories changed as people brought their own traditions and interpretations. For example, many people say that "Nānākuli" means "to look at your knees."<sup>44</sup> He explains that "Nānākuli" actually references to giving birth. The valley before Nānākuli is known as "kahe" meaning "to break your water." Other place names surrounding the Nānākuli area allude to female reproductive parts and pregnancy. Mr. Oliveira explained that his kūpuna emphasized the importance of place names and going to those places to learn about them and their traditions.

He briefly discussed how O'ahu chiefs were decimated by Kahekili of Maui and then Kamehameha during his conquest. This was prophesized by the kahuna, Ka'ōpuluhulu, who met his death in Nānākuli.

Mr. Oliveira referenced Mākua Valley's cultural significance in chants like Kūnihi Ka'ena and Kahuli Ka'ena, uttered by Wahine'ōma'oma'o. Three valleys are named in these chants: Nā 'Ōhikilolo, Nā Mākua, and Nā Kea'au. They are connected to Mākaha. In a tradition of Hi'iakaikapoliopole, these three valleys were princesses who slept with Lohi'au and became known for their fragrant flowers. Ko'iahi is known for its maile lau li'i and Kea'au for its hala.

Mr. Oliveira named some mo'olelo connected to Mākua including the stories of Hi'iaka and Lohi'au, Ko'iahi, and Nanaue. He explained how Mākua embodies these mo'olelo and chants, revealing them in its mountains and landscapes.

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<sup>44</sup> Other Native Hawaiians have asserted other, different meanings for this place name.

Mr. Oliveira shared that Mākua was a place of origin for ali'i. Ali'i were sent from Mākua to rule different places throughout the islands. These traditions come from the Nāmū genealogy. Mr. Oliveira mentioned how place names throughout the islands are inspired by place names from Wai'anae and Mākua.

### **Impacts**

Mr. Oliveira expressed that he feels the most important resource that would be impacted by the Army's retention of these lands is the people. The continued desecration of iwi kūpuna and the place connected to the origins of our kūpuna and ali'i will impact the people.

He specifically mentioned how retention of the land impacts the system of ka'ānani'au, which is a system connected to temples and land divisions.

Mr. Oliveira also discussed how lack of access to Mākua due to the military's presence and the threat of remaining ordnances makes it impossible for the people and practitioners to utilize this culturally significant site. The valley cannot be accessed, and there is no way for people to know what resources remain there and prevents them from going there to worship and practice their culture. Mr. Oliveira has been denied access in the past to honor iwi kūpuna.

### **Mitigation Measures and Recommendations**

Mr. Oliveira stated that the military needs to clean up the valley to mitigate the risk of remaining explosives. He also said that the valley should be returned to the people to care for and protect. The military does not currently use Mākua; they are just holding on to it and not cleaning it up. Mr. Oliveira stated the valley should come back to the lāhui [the people]. The only true way to mitigate the damage is to restore it as best as they can and return it back to the people. He said the military should start to clean up the land now so that in 2029 they can return it to the Hawaiian people. Mr. Oliveira expressed that given its significance, Mākua and the surrounding Kānehunamoku area should become a World Heritage Site. He feels that the land should be returned to the people, not the State. The land should be put in trust for the Hawaiian people, through OHA or some other way.

As a best practice, Mr. Oliveira recommends that the Army find a way to accommodate the people's needs to access these lands beyond means of worship and cultural practices. The land is an important resource to the people, and it is not always for worship or specific practices, but to exist and be with the land of their ancestors.

## **EIS Notices**

### **EIS Scoping Notices**

Notice of Intent

Amended Notice of Intent

Environmental Impact Statement 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

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# **EIS Scoping Notices**

Notice of Intent

Amended Notice of Intent

Environmental Impact Statement Preparation Notice

Affidavit of Publication for Scoping Public Notices

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# **Notice of Intent**

(Office of the Federal Register, *Federal Register*, July 23, 2021)

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functionality of smoke and CO alarms in households, as well as assess user hazard perceptions regarding such alarms. The purpose of the SCOA survey is to collect data that will assist CPSC with better estimation of the number and types of smoke and CO alarms installed in U.S. households, the proportion of working smoke and CO alarms, the characteristics of residences and residents where the smoke and CO alarms are not operational, perceptions of residents related to the causes of “false” alarms or causes of faulty alarms, consumer hazard awareness, and consumer behavior related to alarm use and smoke and CO hazards.

The information collected from the SCOA survey would provide CPSC updated national estimates regarding the use of smoke alarms and CO alarms in households, based on direct observation of alarm installations. The survey also would help CPSC identify the groups that do not have operable smoke alarms and/or CO alarms and understand the reasons why they do not have such alarms. With this information, CPSC would be able to target better its messaging to improve consumer use and awareness regarding the operability of these alarms. In addition, the survey results would help to inform CPSC’s recommendations to voluntary standards groups and state/local jurisdictions regarding their codes, standards, and/or regulations on smoke and CO alarms.

### B. Burden Hours

We estimate the number of respondents to be 1,185. We estimate the total annual burden hours for respondents to be 1,552 hours, based on the total time required to respond to the invitation, screener, and the actual survey. According to the U.S. Bureau of Labor Statistics, the total compensation for civilian workers in March 2021 was \$39.01 per hour (Employer Cost for Employee Compensation, Table 2, <https://www.bls.gov/news.release/ecec.t02.htm>). Therefore, CPSC estimates the cost burden for respondents to be \$60,544 (\$39.01 per hour × 1,552 hours = \$60,543.52). The total cost to the federal government for the contract to design and conduct the revised survey is \$562,725.

### C. Request for Comments

The CPSC invites comments on these topics:

- Whether the proposed collection of information is necessary for the proper performance of CPSC’s functions, including whether the information will have practical utility;

- The accuracy of CPSC’s estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used;

- Ways to enhance the quality, utility, and clarity of the information to be collected; and

- Ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques, when appropriate, and other forms of information technology.

**Alberta E. Mills,**

*Secretary, Consumer Product Safety Commission.*

[FR Doc. 2021–15735 Filed 7–22–21; 8:45 am]

**BILLING CODE 6355–01–P**

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## DEPARTMENT OF DEFENSE

### Department of the Army

#### **Environmental Impact Statement for Army Training Land Retention of State Lands at Kahuku Training Area, Poamoho Training Area, and Makua Military Reservation, Island of O’ahu, Hawai’i**

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

**ACTION:** Notice of intent.

**SUMMARY:** In accordance with the National Environmental Policy Act (NEPA) 1969 and the Hawai’i Environmental Policy Act (HEPA), the Department of the Army (Army) is issuing this Notice of Intent to prepare an Environmental Impact Statement (EIS) to address the Army’s proposed retention of up to approximately 6,300 acres of land currently leased to the Army by the State of Hawai’i (“State-owned lands”) on the island of O’ahu. Lease agreements between the State of Hawai’i and the Army at each of these three training areas were initiated in 1964 and expire in 2029. State-owned lands includes approximately 1,170 acres at Kahuku Training Area (KTA), approximately 4,370 acres at Poamoho Training Area (Poamoho), and approximately 760 acres at Makua Military Reservation (MMR). Training areas are utilized by Army units and other users such as the Marine Corps and Hawaii Army National Guard. Because the Proposed Action involves State-owned lands, 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. The EIS will evaluate the environmental impacts from implementing the proposed land retention.

**DATES:** The Army invites public comments on the scope of the EIS during a 40-day public scoping period. Comments must be received by September 1, 2021.

**ADDRESSES:** Please send written comments to the EIS website at: <https://home.army.mil/hawaii/index.php/OAHUEIS>. Alternatively, comments can be emailed to [usarmy.hawaii.nepa@mail.mil](mailto:usarmy.hawaii.nepa@mail.mil), or mailed to: O’ahu ATR EIS Comments, P.O. Box 3444, Honolulu, HI 96801–3444.

**FOR FURTHER INFORMATION CONTACT:** Please contact Amy Bugala, U.S. Army Garrison-Hawai’i (USAG–HI) Public Affairs Officer, at: (808) 656–3160 or by email to: [usarmy.hawaii.comrel@mail.mil](mailto:usarmy.hawaii.comrel@mail.mil).

**SUPPLEMENTARY INFORMATION:** USAG–HI is home to the 25th Infantry Division (ID), and other commands, whose mission is to deploy to conduct decisive actions in support of unified land operations; the Division conducts continuous persistent engagement with regional partners to shape the environment and prevent conflict across the Pacific operational environment. On orders, these units may conduct theater-wide deployment to perform combat operations in support of U.S. Indo-Pacific Command (USINDOPACOM). The 25th ID is based out of Schofield Barracks on the island of O’ahu and trains on a rotational basis at various training areas, including KTA, Poamoho, and MMR.

Located in northeast O’ahu, KTA has been the site of military training since the mid-1950s. Current training activities on State-owned lands at KTA include high-density company-level helicopter training in a tactical environment, large-scale ground maneuver training, and air support training.

Located in the Ko’olau Mountains in north-central O’ahu, the Poamoho Training Area has been the site of military training since 1964 and provides ideal airspace with ravines and deep vegetation vital to realistic helicopter training.

Located in northwest O’ahu, MMR has been a site for military training for nearly 100 years. Tactical training at MMR began in 1941 after the surprise attack on Pearl Harbor and military exercises continue to this day. Current training activities on State-owned lands at MMR include maneuver training, the establishment and use of restricted airspace for unmanned aerial vehicle training, as well as wildfire suppression and security activities.

The purpose of land retention is to secure the long-term military use of

State-owned parcels, for which current leases expire in 2029. The need to retain use of these training lands is to allow the military to continue to meet current and future training and combat readiness requirements on Army-managed lands in Hawai'i.

To understand the environmental consequences of the decisions to be made, the EIS will evaluate the reasonably foreseeable impacts of a range of potential alternatives that meet the purpose of and need for the Proposed Action. Alternatives to be considered include the No Action Alternative, (1) Full Retention, (2) Modified Retention, and (3) Minimum Retention and Access. The Proposed Action does not involve new training, construction, or resource management activities. Under Full Retention, the Army would retain all State-owned lands within each training area. Under Modified Retention, the Army would retain all State-owned lands within each training area except lands on which limited training occurs. Under Limited Retention and Access, the Army would retain the minimum amount of State-owned lands within each training area that is required for USARHAW to continue to meet its current ongoing training requirements. This includes the State-owned lands with the most vital training/support facilities, infrastructure, maneuver land, all U.S. Government-owned utilities, and access to these features. Other reasonable alternatives raised during the scoping process that meet the Army mission, project purpose, and need will also be considered for evaluation in the EIS.

An EIS-level analysis is being undertaken because the land retention action could have potentially significant impacts on environmental and social resource areas including biological resources, cultural resources, hazardous and toxic materials and wastes, socioeconomic, utilities, and human health and safety. The analysis in the EIS will determine the projected level of impact on each resource area.

The Army anticipates permits and authorizations may be required for the Proposed Action, including a lease from the State of Hawai'i Department of Land and Natural Resources (DLNR), National Historic Preservation Act and Hawai'i Historic Preservation Review consultation with the State Historic Preservation Officer, Endangered Species Act Section 7 consultation with the U.S. Fish and Wildlife Service, a Coastal Zone Management consistency determination from the Hawai'i State Office of Planning, and a Conservation District Use Permit applicability

determination from the DLNR Office of Conservation and Coastal Lands.

The Draft EIS will be available in the summer of 2022. The Final EIS 2023, ROD spring 2024. The Final EIS and Record of Decision are estimated to be available within three years of this notice.

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 Army requests assistance with identifying potential alternatives to the Proposed Action to be considered and identification of information and analyses relevant to the Proposed Action. 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 current recommendations for social distancing and avoiding large public gatherings, the Army may not hold in-person public scoping meetings for this action. In lieu of in-person public scoping meetings, the Army may provide virtual scoping opportunities that will include an online presentation and collaboration tools, as appropriate, and reasonable accommodations for the public to view information and provide oral or written comments subject to COVID-19 limitations. An EIS Scoping Virtual Open House will be held at Leilehua Golf Course (199 Leilehua Golf Course Rd., Wahiawa, HI 96786) on August 9 and 10, 2021 from 6 to 9 p.m. During the EIS Scoping Virtual Open House, video presentations describing the Proposed Action can be viewed online at: <https://home.army.mil/hawaii/index.php/OAHUEIS> and oral comments will be taken via an accompanying call-in option. Written comments will be accepted during the EIS Scoping Virtual Open House and throughout the duration of the 40-day scoping process through an online comment platform or by mail or email. Additional in-person public comment stations may be made available, subject to procedural compliance with governmental guidance and restrictions related to COVID-19. Notification of the EIS Scoping Virtual Open House and in-person public comment stations will also be published and announced in local news media outlets and on the EIS website: <https://home.army.mil/hawaii/index.php/OAHUEIS>. Hard copy scoping materials are available by making a request to Amy Bugala, USAG-HI Public Affairs Officer at (808)

656-3160 or by email to: [usarmy.hawaii.comrel@mail.mil](mailto:usarmy.hawaii.comrel@mail.mil).

**James W. Satterwhite Jr.**,  
Army Federal Register Liaison Officer.  
[FR Doc. 2021-15666 Filed 7-22-21; 8:45 am]

**BILLING CODE 5061-AP-P**

## DEPARTMENT OF DEFENSE

### Office of the Secretary

[Docket ID: DoD-2021-HA-0067]

### Proposed Collection; Comment Request

**AGENCY:** The Office of the Assistant Secretary of Defense for Health Affairs, Department of Defense (DoD).

**ACTION:** Information collection notice.

**SUMMARY:** In compliance with the *Paperwork Reduction Act of 1995*, the Defense Health Agency 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 September 21, 2021.

**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.

# **Amended Notice of Intent**

(Office of the Federal Register, *Federal Register*, August 6, 2021)

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**DEPARTMENT OF DEFENSE****Department of the Army****Environmental Impact Statement for Army Training Land Retention of State Lands at Kahuku Training Area, Poamoho Training Area, and Makua Military Reservation, Island of O'ahu, Hawai'i**

**AGENCY:** Department of the Army, Defense (DoD).

**ACTION:** Amended notice of intent.

**SUMMARY:** The Department of the Army (Army) is issuing this Amended Notice of Intent, updating the original notice published on July 23, 2021 of its continuing intent to prepare an Environmental Impact Statement (EIS) to address the Army's proposed retention of up to approximately 6,300 acres of land currently leased to the Army by the State of Hawai'i ("State-owned lands") on the island of O'ahu. Since coronavirus (COVID-19) restrictions have eased in the City and County of Honolulu in the State of Hawai'i (Mayor of the City and County of Honolulu's Fourteenth Proclamation issued July 2, 2021), in addition to virtual scoping opportunities, EIS scoping sessions are scheduled to be held at Leilehua Golf Course (199 Leilehua Golf Course Rd., Wahiawa, HI 96786) on August 10 and 11, 2021 from 6 to 9 p.m.

**DATES:** The Army invites public comments on the scope of the EIS during a 40-day public scoping period. Comments must be received by September 1, 2021.

**ADDRESSES:** Please send written comments to the EIS website at: <https://home.army.mil/hawaii/index.php/OAHUEIS>. Alternatively, comments can be emailed to [usarmy.hawaii.nepa@mail.mil](mailto:usarmy.hawaii.nepa@mail.mil), or mailed to: O'ahu ATLR EIS Comments, P.O. Box 3444, Honolulu, HI 96801-3444. EIS scoping sessions will be held at Leilehua Golf Course (199 Leilehua Golf Course Rd., Wahiawa, HI 96786) on August 10 and 11, 2021 from 6 to 9 p.m., during which video presentations will also be viewable at <https://home.army.mil/hawaii/index.php/OahuEIS>, and oral comments will be taken via an accompanying call-in option at 808-556-8277.

**FOR FURTHER INFORMATION CONTACT:** Please contact Amy Bugala, U.S. Army Garrison-Hawai'i (USAG-HI) Public Affairs Officer, at: (808) 656-3158 or by email to: [usarmy.hawaii.comrel@mail.mil](mailto:usarmy.hawaii.comrel@mail.mil).

**SUPPLEMENTARY INFORMATION:** The Army is updating **Federal Register**, Vol. 86,

No. 139, 39007 with this notice. USAG-HI is home to the 25th Infantry Division (ID), and other commands, whose mission is to deploy to conduct decisive actions in support of unified land operations; the Division conducts continuous persistent engagement with regional partners to shape the environment and prevent conflict across the Pacific operational environment. On orders, these units may conduct theater-wide deployment to perform combat operations in support of U.S. Indo-Pacific Command (USINDOPACOM). The 25th ID is based out of Schofield Barracks on the island of O'ahu and trains on a rotational basis at various training areas, including KTA, Poamoho, and MMR.

Located in northeast O'ahu, KTA has been the site of military training since the mid-1950s. Current training activities on State-owned lands at KTA include high-density company-level helicopter training in a tactical environment, large-scale ground maneuver training, and air support training.

Located in the Ko'olau Mountains in north-central O'ahu, the Poamoho Training Area has been the site of military training since 1964 and provides ideal airspace with ravines and deep vegetation vital to realistic helicopter training.

Located in northwest O'ahu, MMR has been a site for military training for nearly 100 years. Tactical training at MMR began in 1941 after the surprise attack on Pearl Harbor and military exercises continue to this day. Current training activities on State-owned lands at MMR include maneuver training, the establishment and use of restricted airspace for unmanned aerial vehicle training, as well as wildfire suppression and security activities.

State-owned lands include approximately 1,170 acres at Kahuku Training Area (KTA), approximately 4,370 acres at Poamoho Training Area (Poamoho), and approximately 760 acres at Makua Military Reservation (MMR). Training areas are utilized by Army units and other users such as the Marine Corps and Hawaii Army National Guard. Because the Proposed Action involves State-owned lands, 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. The EIS will evaluate the environmental impacts from implementing the proposed land retention.

The purpose of land retention is to secure the long-term military use of State-owned parcels, for which current

leases expire in 2029. The need to retain use of these training lands is to allow the military to continue to meet current and future training and combat readiness requirements on Army-managed lands in Hawai'i.

To understand the environmental consequences of the decisions to be made, the EIS will evaluate the reasonably foreseeable impacts of a range of potential alternatives that meet the purpose of and need for the Proposed Action. Alternatives to be considered include the No Action Alternative, (1) Full Retention, (2) Modified Retention, and (3) Minimum Retention and Access. The Proposed Action does not involve new training, construction, or resource management activities. Under Full Retention, the Army would retain all State-owned lands within each training area. Under Modified Retention, the Army would retain all State-owned lands within each training area except lands on which limited training occurs. Under Limited Retention and Access, the Army would retain the minimum amount of State-owned lands within each training area that is required for USARHAW to continue to meet its current ongoing training requirements. This includes the State-owned lands with the most vital training/support facilities, infrastructure, maneuver land, all U.S. Government-owned utilities, and access to these features. Other reasonable alternatives raised during the scoping process that meet the Army mission, project purpose, and need will also be considered for evaluation in the EIS.

An EIS-level analysis is being undertaken because the land retention action could have potentially significant impacts on environmental and social resource areas including biological resources, cultural resources, hazardous and toxic materials and wastes, socioeconomic, utilities, and human health and safety. The analysis in the EIS will determine the projected level of impact on each resource area.

The Army anticipates permits and authorizations may be required for the Proposed Action, including a lease from the State of Hawai'i Department of Land and Natural Resources (DLNR), National Historic Preservation Act and Hawai'i Historic Preservation Review consultation with the State Historic Preservation Officer, Endangered Species Act Section 7 consultation with the U.S. Fish and Wildlife Service, a Coastal Zone Management consistency determination from the Hawai'i State Office of Planning, and a Conservation District Use Permit applicability determination from the DLNR Office of Conservation and Coastal Lands.

The Draft EIS will be available at the end of 2022. The Final EIS will be published in 2023, and the ROD will be available by fall 2024. The Final EIS and Record of Decision are estimated to be available within three years of this notice.

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 Army requests assistance with identifying potential alternatives to the Proposed Action to be considered and identification of information and analyses relevant to the Proposed Action. Written comments must be sent within 40 days of publication of the Notice of Intent in the **Federal Register**. Written comments will be accepted during the EIS Scoping Open House and throughout the duration of the 40-day scoping process through an online comment platform or by mail or email. Notification of the EIS Scoping Open House will also be published and announced in local news media outlets and on the EIS website: <https://home.army.mil/hawaii/index.php/OAHUEIS>. Hard copy scoping materials are available by making a request to Amy Bugala, USAG-HI Public Affairs Officer at (808) 656-3158 or by email to: [usarmy.hawaii.comrel@mail.mil](mailto:usarmy.hawaii.comrel@mail.mil).

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

*Army Federal Register Liaison Officer.*

[FR Doc. 2021-16807 Filed 8-5-21; 8:45 am]

**BILLING CODE 5061-AP-P**

## DEPARTMENT OF DEFENSE

### Department of Army

#### **Final Environmental Impact Statement and Finding of no Practicable Alternative for Implementation of Area Development Plan at Davison Army Airfield, Fort Belvoir, Virginia**

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

**ACTION:** Notice of availability.

**SUMMARY:** The Department of Army (Army) announces the availability of the Final Environmental Impact Statement (EIS) for the proposed implementation of an Area Development Plan (ADP) for Davison Army Airfield (DAAF) at Fort Belvoir, Virginia. In accordance with the National Environmental Policy Act (NEPA), the Final EIS analyzes the potential environmental impacts associated with implementing the construction, modernization, and demolition projects at DAAF

recommended in the ADP (Proposed Action). A Finding of No Practicable Alternative (FONPA) addressing potential impacts on floodplains and wetlands was prepared in parallel with and is included as an appendix to the Final EIS. The Proposed Action would be implemented over an approximately 30-year time period to provide facilities and infrastructure necessary to support the ongoing and future missions of DAAF's tenants. The Proposed Action would improve the airfield's functional layout, demolish and replace aging facilities and infrastructure, and address multiple operational safety concerns along the runway. The ADP is specific to DAAF and all projects would occur entirely within its boundaries. No substantial changes in missions, air operations, or the number of aircraft and personnel at DAAF would occur under the Proposed Action.

**FOR FURTHER INFORMATION CONTACT:**

Please contact: Ms. Wilamena G. Harback, Fort Belvoir Directorate of Public Works-Environmental Division (DPW-ED) via phone at (703) 806-3193 or (703) 806-0020, during normal working business hours, Monday through Friday, 8:00 a.m. to 4:00 p.m. Further information may also be requested via email to: [FortBelvoirNOI@usace.army.mil](mailto:FortBelvoirNOI@usace.army.mil). Electronic copies of the Final EIS and FONPA are available on Fort Belvoir's website at: <https://home.army.mil/belvoir/index.php/about/Garrison/directorate-public-works/environmental-division>.

**SUPPLEMENTARY INFORMATION:** The Final EIS analyzes the potential environmental impacts of the Army's Proposed Action to implement the construction, modernization, and demolition projects recommended in the ADP. The Proposed Action would occur entirely within the 673-acre DAAF property on Fort Belvoir. Up to 24 ADP projects would be implemented in three sequential phases over the course of an approximately 30-year time period, as follows: Short-range (next 10 years), mid-range (11 to 20 years from now), and long-range (21 to 30 years from now). No substantial changes in missions, air operations, or the number of aircraft and personnel at DAAF would occur under the Proposed Action. Operational noise levels following implementation of the Proposed Action would remain similar to current conditions.

The Proposed Action includes the construction of new hangars, administrative and operational facilities; the modernization of existing facilities; the demolition of up to 37 existing buildings and structures; and related

infrastructure improvements. Demolition activities would remove a number of facilities that partially obstruct the airfield's Primary and Transitional Surfaces, which are required to be free of obstructions in accordance with Department of Defense (DoD) operational safety criteria. These facilities require temporary safety waivers to operate.

The Final EIS assesses the direct, indirect, and cumulative potential environmental impacts associated with the Proposed Action. In support of the Final EIS, the Army conducted consultation to obtain regulatory concurrence in accordance with Section 7 of the Endangered Species Act, Section 106 of the National Historic Preservation Act, and Section 307 of the Coastal Zone Management Act.

The Army evaluated several alternatives for the Proposed Action before selecting two action alternatives for detailed analysis in the Final EIS: The Full Implementation Alternative and the Partial Implementation Alternative. A No Action Alternative was also carried forward for analysis.

1. *Full Implementation Alternative (Preferred Alternative):* This alternative would implement the complete suite of 24 projects recommended in the DAAF ADP. The Full Implementation Alternative would accommodate the space and functional needs of all DAAF tenants consistent with applicable DoD requirements. It would also fulfill DAAF's vision to create a safe, secure, sustainable, and consolidated aviation complex.

2. *Partial Implementation Alternative:* This alternative would implement a modified, reduced program of 15 ADP projects at DAAF. The Partial Implementation Alternative would not address DAAF's tenants' requirements in full, but would substantially improve conditions.

Under the No Action Alternative, the Army would not implement the DAAF ADP; existing conditions at the airfield would continue for the foreseeable future. The No Action Alternative does not meet the Proposed Action's purpose and need, but was analyzed in the Final EIS to provide a baseline for the comparison of impacts from the Full and Partial Implementation Alternatives.

The Final EIS analyzed the Proposed Action's potential impacts on land use, aesthetics, and coastal zone management; historic and cultural resources; air quality; noise; geology, topography, and soils; water resources; biological resources; health and safety; and hazardous materials and waste.


# **Environmental Impact Statement Preparation Notice**

(State of Hawai'i Office of Planning and  
Sustainable Development Environmental Review Program  
*The Environmental Notice, July 23, 2021*)

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## O'AHU (CONTINUED)

**Army Training Land Retention on State Lands on O'ahu (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>Districts/TMKs</b>	O'ahu-Numerous (see document)	
<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> 1151 Punchbowl St., Room 220, Honolulu, HI 96813	
<b>Applicant</b>	U.S. Army Garrison-Hawai'i & U.S. Army Installation Management Command Daisy Pate, (808) 222-3227, <a href="mailto:daisy.b.pate@usace.army.mil">daisy.b.pate@usace.army.mil</a> U.S. Army Garrison Hawai'i, Directorate of Public Works - Environmental Building 105, 3rd Floor, Wheeler Army Airfield 948 Santos Dumont Ave., Schofield Barracks, HI 96857-5013	
<b>Consultant</b>	G70; 111 S King St., Suite 170, Honolulu, HI 96813 Jeff Merz, (808) 523-5866, <a href="mailto:ATLR-OAHU-EIS@g70.design">ATLR-OAHU-EIS@g70.design</a>	
<b>Status</b>	Administrative public review and comment period starts. <b>Comments are due by September 1, 2021.</b> Please send comments to <a href="mailto:usarmy.hawaii.nepa@mail.mil">usarmy.hawaii.nepa@mail.mil</a> and copy the consultant. <b>Hybrid in-person/online EIS Public Scoping meetings will be held August 10 &amp; 11, 2021, 6 - 9 p.m. at Leilehua Golf Course</b> (199 Leilehua Golf Course Rd, Wahiawā, HI); attend one of the meetings or Live stream available through website: <a href="https://home.army.mil/hawaii/index.php/OahuEIS">https://home.army.mil/hawaii/index.php/OahuEIS</a>	

The Army training lands on the island of O'ahu at Kahuku Training Area (KTA), Kawaihoa-Poamoho (Poamoho), and Makua Military Reservation (MMR) include approximately 18,060 acres of State-owned and federally-owned properties. The U.S. Government leases up to approximately 6,300 acres of State lands and these leases expire on August 16, 2029.

The Army proposes to retain these lands in support of continued military training. Retaining use of these training areas will allow the military to continue to meet current and future training requirements on Army-managed lands to meet its mission of readiness. The Proposed Action does not involve new training, construction, or resource management activities at the subject areas. Instead, it is a real estate action that would enable the continuation of existing military use and/or management of the land. A Notice of Intent for this action will be published in the Federal Register.

## KAUAI

**Kauai Police Department Kapa'a Substation--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>	Kawaihau	
<b>TMK(s)</b>	(4) 4-6-014: 013	
<b>Permit(s)</b>	Use Permit, Building Permits	
<b>Proposing/Determining Agency</b>	County of Kauai, Department of Public Works Doug Haigh, Building Division Chief, (808) 241-4854, <a href="mailto:dhaigh@kauai.gov">dhaigh@kauai.gov</a> 4444 Rice Street, Suite 175, Lihu'e, HI 96766-1340	
<b>Consultant</b>	Environmental Communications, Inc.; P.O. Box 236097 Honolulu, HI 96823 Taeyong Kim, 808-528-4661, <a href="mailto:tkim@environcom.com">tkim@environcom.com</a>	
<b>Status</b>	Statutory 30-day public review and comment period starts. <b>Comments are due by August 23, 2021.</b> Please send comments to the proposing/determining agency and copy the consultant.	

The project site consists of vacant land and a single story single-family dwelling that is used for overflow parking from the adjacent Samuel Mahelona Memorial Hospital. The site is open and grassed along its Kawaihau Road frontage and slopes towards a natural ravine. The proposed action consists of the construction of a 7,020 square foot police substation. The building will include standard police functions such as administrative offices, locker rooms, training areas, holding cell and interview rooms, and a multipurpose room. Appurtenant to the main building are 45 parking stalls including ADA accessible stalls and two spaces reserved for large police vehicles. The subject facility is required to properly maintain police services within the growing Kapa'a and North Shore population centers. Presently, the only structure where police officers can perform paperwork is a temporary location at the Armory building. Intake, briefings and other typical functions must presently occur at the Lihu'e Station.

The estimated construction cost for the project is \$8,000,000.00.

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**Affidavit of Publication  
for Scoping Public Notices**

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AFFIDAVIT OF PUBLICATION

IN THE MATTER OF  
PUBLIC NOTICE

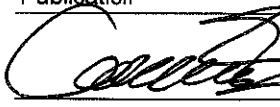
STATE OF HAWAII }  
 } SS.  
City and County of Honolulu }

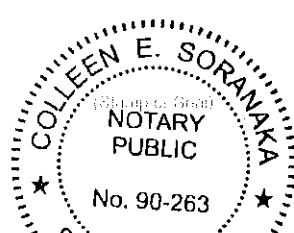
AUG 06 2021

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

Notary Name: COLLEEN E. SORANAKA First Judicial Circuit

Doc. Description: Affidavit of  
Publication

 AUG 06 2021  
Notary Signature Date



Lisa Sakakida being duly sworn, deposes and says that she is a clerk, duly employed 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:  
07/23, 07/30, 08/06/2021

MidWeek 0 times on:

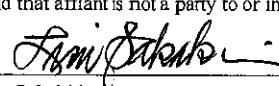
The Garden Island 0 times on:

Hawaii Tribune-Herald 0 times on:

West Hawaii Today 0 times on:

Other Publications: 0 times on:

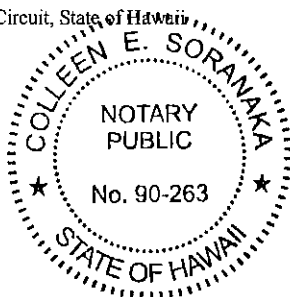
And that affiant is not a party to or in any way interested in the above entitled matter.

  
Lisa Sakakida

Subscribed to and sworn before me this 06 day of August A.D. 2021

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

Ad # 0001335266



U.S. Army to Prepare Environmental Impact Statement for  
Army Training Land Retention at Oahu Training Areas

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 6,300 acres of lands currently leased to the Army by the State of Hawaii at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Makua Military Reservation on the island of Oahu. The 65-year leases expire on August 16, 2029. The EIS will be a joint NEPA-HEPA document and the public scoping processes will run concurrently.

The public is invited to participate in the scoping process for the EIS by submitting written comments on the scope of the EIS during the scoping period, July 23-Sept. 1, 2021, online at <https://home.army.mil/hawaii/index.php/OahuEIS>, by email to [usarmy.hawaii.nepa@mail.mil](mailto:usarmy.hawaii.nepa@mail.mil), or by mail to: ATLR Oahu EIS Comments, P.O. Box 3444, Honolulu, HI 96801-3444. Comments must be postmarked or submitted online by Sept. 1, 2021 to be considered in the preparation of the EIS.

The public is also invited to participate in one of the two scoping sessions being held on Tuesday, Aug. 10 and Wednesday, Aug. 11, 2021, from 6-9 p.m. at Leilehua Golf Course (199 Leilehua Golf Course Rd, Wahiawa, HI 96786). The presentations will be identical on both days and will also be live-streamed (details on website; see link below). During the scoping sessions, participants can:

- 1) Attend in-person or virtually to view presentation and listen: <https://home.army.mil/hawaii/index.php/OahuEIS>
- 2) Provide comments in person at a meeting orally and/or submit written comments in a drop box on site.
- 3) Submit comments online through the website (<https://home.army.mil/hawaii/index.php/OahuEIS>).
- 4) Call (808) 556-8277 to submit oral comments from 4-9 p.m. (only on Tuesday, Aug. 10, and Wednesday, Aug. 11).

For more information or accessibility requests, please contact the U.S. Army Garrison Hawaii Public Affairs Office at [usarmy.hawaii.comrel@mail.mil](mailto:usarmy.hawaii.comrel@mail.mil) or (808) 856-3158.  
(SA1335266 7/23, 7/30, 8/6/21)

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

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# **Draft EIS Notices**

Notice of Availability

Notification for the Draft EIS

Affidavit of Publication for Draft EIS Public Notices

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# **Notice of Availability**

(Office of the Federal Register, *Federal Register*, June 7, 2024)

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*Service(s)*

*Service Type:* Verbatim Transcription Service

*Mandatory for:* COMPACFLT, Commander, U.S. Pacific Fleet, Pearl Harbor, HI

*Authorized Source of Supply:* Lighthouse for the Blind of Houston, Houston, TX

*Contracting Activity:* DEPT OF THE NAVY, NAVSUP FLT LOG CTR PEARL HARBOR

*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**

On 5/3/2024 (89 FR 3677), the Committee for Purchase From People Who Are Blind or Severely Disabled published notice of proposed deletions from the Procurement List. This notice is published pursuant to 41 U.S.C. 8503 (a)(2) and 41 CFR 51–2.3.

After consideration of the relevant matter presented, the Committee has determined that the product(s) and service(s) listed below are no longer suitable for procurement by the Federal Government under 41 U.S.C. 8501–8506 and 41 CFR 51–2.4.

*Regulatory Flexibility Act Certification*

I certify that the following action will not have a significant impact on a substantial number of small entities. The major factors considered for this certification were:

1. The action will not result in additional reporting, recordkeeping or other compliance requirements for small entities.

2. The action may result in authorizing small entities to furnish the product(s) to the Government.

3. There are no known regulatory alternatives which would accomplish the objectives of the Javits-Wagner-O'Day Act (41 U.S.C. 8501–8506) in connection with the product(s) deleted from the Procurement List.

*End of Certification*

Accordingly, the following product(s) are deleted from the Procurement List:

*Product(s)*

*NSN(s)—Product Name(s):*

8415–00–NIB–0810—Glove, Vinyl, Industrial/Non-Medical Grade, Small  
8415–00–NIB–0811—Glove, Vinyl, Industrial/Non-Medical Grade, Medium  
8415–00–NIB–0812—Glove, Vinyl, Industrial/Non-Medical Grade, Large  
8415–00–NIB–0813—Glove, Vinyl, Industrial/Non-Medical Grade, XLarge  
*Mandatory Source of Supply:* BOSMA Enterprises, Indianapolis, IN  
*Contracting Activity:* STRATEGIC ACQUISITION CENTER, FREDERICKSBURG, VA

*NSN(s)—Product Name(s):*  
6508–01–694–1827—Refill, PURELL—SKILCRAFT, Healthcare Advanced Hand Sanitizer, Ultra Nourishing Foam, ES8 System

*Mandatory Source of Supply:* Travis Association for the Blind, Austin, TX  
*Contracting Activity:* DLA TROOP SUPPORT, PHILADELPHIA, PA

**Michael R. Jurkowski,**

*Director, Business Operations.*

[FR Doc. 2024–12480 Filed 6–6–24; 8:45 am]

**BILLING CODE 6353–01–P**

**DEPARTMENT OF DEFENSE****Department of the Army****Draft Environmental Impact Statement for Army Training Land Retention at Kahuku Training Area, Kawailoa-Poamoho Training Area, and Makua Military Reservation, Island of O'ahu, 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: to retain up to approximately 6,322 acres of land the Army currently leases from the State of Hawai'i. These lands are located on the island of O'ahu and comprise approximately 1,150 acres at Kahuku Training Area (KTA), approximately 4,390 acres at Kawailoa-Poamoho Training Area (Poamoho), and approximately 782 acres at Makua Military Reservation (MMR). The purpose of the proposed action is to retain these three areas for military training beyond the end of the current leases. The need for the proposed action is to maintain facilities for training by the Army and other Department of Defense organizations, as such training facilities are not available elsewhere in 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 these lands would cease when the leases expire in 2029. Because the proposed retention involves state-owned lands, the EIS is a joint NEPA–HEPA document. The two public review processes run concurrently.

**DATES:** The Army invites public comments on the Draft EIS during the 60-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 August 7, 2024. Public meetings will be held at Wai'anae District Park Multi-Purpose Room on July 9, 2024, Kahuku High and Intermediate School on July 10, 2024, and at Leilehua High School on July 11, 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 on how to submit comments is available on the EIS website: <https://home.army.mil/hawaii/index.php/OahuEIS/project-home>.

**ADDRESSES:** Written comments should be submitted through the EIS website (<https://home.army.mil/hawaii/index.php/OahuEIS/project-home>); emailed to [atlr-oahu-eis@g70.design](mailto:atlr-oahu-eis@g70.design); mailed to O'ahu ATLR EIS Comments, P.O. Box 3444, Honolulu, HI 96801–3444; or provided during public meetings. Comments must be postmarked or received by August 7, 2024.

**FOR FURTHER INFORMATION CONTACT:** Mr. Michael Donnelly, U.S. Army Garrison-Hawai'i 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:** U.S. Army Garrison-Hawai'i is home to the 25th Infantry Division (25th ID) and other commands, the mission of which is to deploy and conduct decisive actions in support of unified land operations. 25th ID is based at Schofield Barracks on the island of O'ahu. 25th ID trains on a rotational basis at various training areas, including KTA, Poamoho, and MMR.

Located in northeast O'ahu, KTA has been the site of military training since the mid-1950s. Current training activities on state-owned land at KTA include high-density, company-level helicopter training in a tactical environment, large-scale ground maneuver training, and air support training.

Located in the Ko'olau Mountains in north-central O'ahu, Poamoho has been

the site of military training since 1964. It provides airspace with ravines and deep vegetation for realistic helicopter training.

Located in northwest O'ahu, MMR has been a military training site for nearly 100 years. Tactical training at MMR began in 1941 after the attack on Pearl Harbor and military training continues to this day. Current activities on state-owned land at MMR include maneuver training, the use of restricted airspace for unmanned aerial vehicle training, as well as wildland fire suppression and security activities.

The Draft EIS evaluates the potential impacts of a range of alternatives:

For KTA—(1) Full Retention (of approximately 1,150 acres); (2) Modified Retention (of approximately 450 acres);

For Poamoho—(1) Full Retention (of approximately 4,390 acres); (2) Modified Retention (of approximately 3,170 acres);

For MMR—(1) Full Retention (of approximately 782 acres); (2) Modified Retention (of approximately 572 acres); (3) Minimum Retention and Access (of approximately 162 acres and 2.4 miles of select range and firebreak roads).

Under the No-Action Alternative for each of these training areas, the leases would lapse in 2029 and the Army would lose access to these training areas. The Army has identified the preferred alternative as Alternative 2 at each of the training areas.

The Draft EIS analyzes the impacts of both a new lease of the areas and full federal ownership (*i.e.*, fee simple title). The Draft EIS analyzes land use, biological resources, cultural resources/practices, hazardous substances and hazardous wastes, air quality, greenhouse gases, noise, geology, topography, soils, water resources, socioeconomic, environmental justice, transportation, traffic, human health, and safety. The Draft EIS indicates that significant adverse impacts on land use (land tenure) and environmental justice would occur with a lease or fee simple title at: KTA and Poamoho under Alternatives 1 and 2; and MMR under Alternatives 1, 2, and 3. Significant adverse impacts on cultural practices would occur with a lease or fee simple title at MMR under Alternatives 1, 2, and 3. Some of the significant impacts for land use (land tenure) could be reduced to less than significant. The modified or minimum retention alternatives would have significant beneficial impacts on land use (land tenure) for land not retained at KTA, Poamoho, and MMR. Impacts of the action alternatives on other resources are less than significant. The No-Action Alternative would have a significant

beneficial impact on land use (land tenure) and environmental justice at all sites, and on cultural practices at MMR. The No-Action Alternative would have less than significant impacts on all other resources at the three sites.

To mitigate adverse impacts on land use (land tenure), the Army would consider adding non-barbed-wire fencing and signage to minimize accidental or intentional trespass from adjacent non-U.S. Government-controlled land. This applies to Alternative 2 for KTA and to Alternatives 2 and 3 for MMR. As mitigation for impacts to cultural practices and environmental justice at MMR, the Army would, for alternatives 1, 2, and 3: review and update its public engagement efforts; work with cultural practitioners and Native Hawaiian Organizations to update and/or develop a mutually beneficial cultural access plan; and promote long-term stewardship of the *āina* (*i.e.*, the land of Hawai'i) with regard to military use of state-owned land. The Army distributed the Draft EIS to Native Hawaiian Organizations, to federal, state, and local agencies/officials, and to other stakeholders. The Draft EIS and related information are available on the EIS website at: <https://home.army.mil/hawaii/index.php/OahuEIS/project-home>. 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. Kahuku Public and School Library, 56–490 Kamehameha Highway, Kahuku, HI 96731
3. Wahiawā Public Library, 820 California Ave., Wahiawā, HI 96786
4. Wai'anae Public Library, 85–625 Farrington Highway, Wai'anae, HI 96792

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 comments postmarked or received by August 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. 2024–12573 Filed 6–6–24; 8:45 am]

**BILLING CODE 3711–02–P**

## DEPARTMENT OF DEFENSE

### Office of the Secretary

[Docket ID: DoD–2024–OS–0065]

### U.S. Court of Appeals for the Armed Forces Proposed Rules Changes

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

**ACTION:** Notice of proposed redraft of the Rules of Practice and Procedure of the United States Court of Appeals for the Armed Forces.

**SUMMARY:** This notice announces proposed redrafting of the Rules of Practice and Procedure, United States Court of Appeals for the Armed Forces. Although these rules of practice and procedure fall within the Administrative Procedure Act's exemptions for notice and comment, the Department, as a matter of policy, has decided to make these changes available for public review and comment before they are implemented.

**DATES:** Comments on the proposed changes must be received by July 8, 2024.

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

- *Federal eRulemaking Portal:* <http://www.regulations.gov>.

- *Mail:* Department of Defense, Office of the Assistant to the Secretary of Defense for Privacy, Civil Liberties, and Transparency, Regulatory Directorate, 4800 Mark Center Drive, Attn: Mailbox 24, Suite 08D09, Alexandria, VA 22350–1700.

*Instructions:* All submissions received must include the agency name and docket number 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 personal identifiers or contact information.

**FOR FURTHER INFORMATION CONTACT:** Malcolm H. Squires, Jr., Clerk of the Court, telephone (202) 761–1448.

**SUPPLEMENTARY INFORMATION:** This notice announces a new draft of the Rules of Practice and Procedure of the United States Court of Appeals for the Armed Forces. The Court, with the help of its Rules Committee, has sought to rework nearly every existing rule to bring them in line with the changes to the Uniform Code of Military Justice and various technological advances.



# **Notification for the Draft EIS**

(State of Hawai'i Office of Environmental Quality Control,  
*The Environmental Notice, June 8, 2024*)

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## O'AHU EAS/EISS

### Army Training Land Retention on O'ahu--Draft EIS

<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>	O'ahu-multiple
<b>TMK(s)</b>	Numerous (see document)
<b>Permit(s)</b>	Numerous (see document)
<b>Approving Agency/ Accepting Authority</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 St., Land Division, 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 948 Santos Dumont Ave., Building 105, 3rd Floor, Wheeler Army Airfield, HI 96857-5013
<b>Consultant</b>	G70; 111 S. King St., Suite 170, Honolulu, HI 96813 Jeff Merz, (808) 523-5866, <a href="mailto:ATLR-OAHU-EIS@g70.design">ATLR-OAHU-EIS@g70.design</a>
<b>Status</b>	Statutory public review and comment period starts. Pursuant to HRS Chapter 343 ("HEPA"), <b>the 45-day comment period runs through July 23, 2024; however, since this is a joint HEPA-NEPA document, the Applicant will accept comments through August 7, 2024.</b> Please address comments to the approving agency at <a href="https://home.army.mil/hawaii/OahuEIS">https://home.army.mil/hawaii/OahuEIS</a>

Since 1964, the Army has leased approximately 6,322 acres on O'ahu from the State of Hawai'i. The leases expire on August 16, 2029. The Army proposes to retain up to approximately 6,322 acres of State-owned lands at Kahuku Training Area (KTA), Kawaihoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) in support of continued military training (Proposed Action). The purpose of the Proposed Action is to enable U.S. Army Hawaii (USARHAW) to continue to conduct military training on the State-owned lands within KTA, Poamoho, and MMR to meet its ongoing training requirements. The Proposed Action is needed to provide austere training environments, preserve maneuver areas, enable access between U.S. Government-owned lands in these three training areas, retain infrastructure investments, and allow for future facility and infrastructure modernization in support of USARHAW-coordinated training. The Proposed Action is a real estate action that would enable continuation of ongoing activities and does not include construction or changes in ongoing activities.

### Helemano Elementary School Administration / Library Building--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>	Wahiawā
<b>TMK(s)</b>	(1) 7-1-002: 017
<b>Permit(s)</b>	Variance from Pollution Controls (Noise Permit), Disability and Communications Access Board Review, Historic Site Review, Water Connection Permit, Building, Grading and Grubbing, Certificate of Occupancy, Street Usage, HFD Plan Check
<b>Proposing/ Determining Agency</b>	State of Hawai'i, Department of Education Karynn Yoneshige, (808) 784-5127, <a href="mailto:Karynn.Yoneshige@k12.hi.us">Karynn.Yoneshige@k12.hi.us</a> 3633 Waialae Avenue, Honolulu, HI 96816
<b>Consultant</b>	Gerald Park Urban Planner; 95-595 Kaname'e Street #324, Mililani, HI 96789 Gerald Park, (808) 625-9626, <a href="mailto:gpark@gpup.biz">gpark@gpup.biz</a>
<b>Status</b>	Finding of No Significant Impact (FONSI) determination

The purpose of the action is to provide a new permanent building at a central location with dedicated space for an administrative center and expanded library.

The existing single level, 2,800 square foot Administration Building will be demolished and replaced with a two-story Administration / Library Building on the same site as the existing. Administrative functions will locate on the approximately 6,140 square foot ground floor and the Library on the approximately 4,970 square foot second floor.

The cost of the project is estimated at \$16.5 million and will be funded by the State of Hawaii. The improvement will be built in one phase and take 14 to 18 months to complete.

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

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AFFIDAVIT OF PUBLICATION

IN THE MATTER OF

U.S. Army Publishes Draft Environmental Impact Statement for Army Training Land Retention of State Lands at Kahuku Training Area, Kawaiiloa-Poamoho Training Area, and Makua Military Reservation

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

Doc. Date: JUL 07 2024 # Pages: 1
Notary Name: COLLEEN E. SORANAKA First Judicial Circuit
Doc. Description: Affidavit of Publication
Notary Signature: [Signature] Date: JUL 08 2024
Notary Public Seal: COLLEEN E. SORANAKA, NOTARY PUBLIC, No. 90-263, STATE OF HAWAII

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: 06/07, 06/21, 07/07/2024
MidWeek 0 times on:
The Garden Island 0 times on:
Hawaii Tribune-Herald 0 times on:
West Hawaii Today 0 times on:
Other Publications: 0 times on:

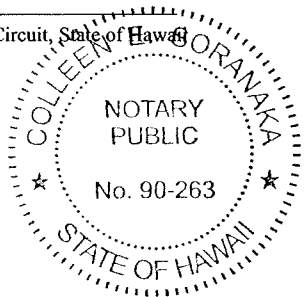
And that affiant is not a party to or in any way interested in the above entitled matter.

[Signature]
Kimberly Masu

Subscribed to and sworn before me this 8th day of July A.D. 2024

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

Ad # 0001457164



ICSP NO.:

U.S. Army Publishes Draft Environmental Impact Statement for Army Training Land Retention of State Lands at Kahuku Training Area, Kawaiiloa-Poamoho Training Area, and Makua Military Reservation
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 Draft Environmental Impact Statement (EIS) to analyze the Army's proposed retention of up to approximately 6,322 acres of lands currently leased to the Army by the State of Hawai'i at Kahuku Training Area, Kawaiiloa-Poamoho Training Area, and Makua Military Reservation on the island of O'ahu. The 65-year leases expire on August 16, 2029. The public comment periods will run concurrently to meet both NEPA and HEPA requirements.
The Army invites public comments on the Draft EIS during the public comment period beginning June 7, 2024. The Draft EIS and public meeting materials are available on the EIS website: https://home.army.mil/hawaii/OahuEIS. The public may also review the Draft EIS at the following locations: Hawai'i Document Center at the Hawai'i State Library, Kahuku Public Library, Wahiawa Public Library, and Wai'anae Public Library. Comments can be submitted on the EIS website, emailed to ATR-0AHU-EIS@g70.design, or mailed to O'ahu ATR EIS Comments, P.O. Box 3444, Honolulu, HI 96801-3444. Comments must be postmarked or submitted online by 11:59 p.m. Hawai'i Standard Time on August 7, 2024 to be considered in the preparation of the Final EIS.
The public is invited to attend Draft EIS public meetings on the following dates and times on the island of O'ahu:
Wai'anae District Park Multipurpose Room - July 9, 2024, from 6-8 PM
Kahuku High and Intermediate School - July 10, 2024, from 6-8 PM
Leilehua High School - July 11, 2024, from 6-8 PM
The public can participate during the public meetings in the following ways:
1) View project documents and link to live video stream of public meetings on the EIS website: https://home.army.mil/hawaii/OahuEIS.
2) Provide oral comments in person at one or more of the three public meetings and/or submit written comments in a drop box on site.
3) Call (808) 515-5518 to submit oral comments (only available on July 9, 10, and 11)\*.
\*Comments may be submitted online or via email or mail throughout the 60-day public review period.
For more information or accessibility requests, please contact the U.S. Army Garrison Hawai'i Public Affairs Office at usarmy.hawaii.nepa@army.mil or (808) 787-2140.
(SA 1457164 6/7, 6/21, 7/7/24)

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# Public Meeting Materials

## Public Scoping Open House Meeting Materials

Summary of EIS Public Scoping Sessions

Posters

Fact Sheet

Flyer

Direct Mail Postcard

## Draft EIS Meeting Materials

Posters

Fact Sheet

Flyer

Direct Mail Postcard

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# **Public Scoping Open House Meeting Materials**

Summary of EIS Public Scoping Sessions

Posters

Fact Sheet

Flyer

Direct Mail Postcard

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# **Summary of EIS Public Scoping Sessions**

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**ARMY TRAINING LAND RETENTION AT KAHUKU TRAINING AREA, KAWAIILOA-POAMOHO  
TRAINING AREA, AND MAKUA MILITARY RESERVATION, ISLAND OF O’AHU**

**AUGUST 10 AND 11, 2021 WEBINAR SCOPING SESSIONS**

**ORAL SCOPING COMMENTS  
AND  
AUGUST 10 THROUGH 12, 2021 PHONE RECORDINGS  
OTHER SCOPING COMMENTS**

**- General Summary -**

Due to public health restrictions on public gatherings pursuant to the Governor’s announcement [Executive Order No. 21-05] on August 10, 2021, planned in-person scoping sessions were shifted to all virtual/online events. During the virtual/online events, the public was provided with opportunities to view presentations via website, webinar, and live stream. Hard copies of the presentations were made available by request. Oral comments were received, and audio recorded through the Zoom webinar platform (classified as “Oral”) and phone line (classified as “Other”). Additional written comments were received via website, email, P.O. box mail (classified as “Letters”) during the scoping comment period of July 23, 2021 through September 1, 2021.

In keeping with federal, state and county guidance to minimize risk of transmission of the corona-virus, the meetings were held on a web-based (webinar) platform. Webinar scoping sessions were held on August 10 and 11, 2021 from 6:00 to 9:00 p.m. and an online Open House was live on the O’ahu EIS website (<https://home.army.mil/hawaii/index.php/OahuEIS>) from August 10, 2021, 4:00 PM through September 1, 2021, 11:59 PM. The webinar was live-streamed, for which the recording may be accessed on the U.S. Army Garrison YouTube channel (<https://www.youtube.com/c/usaghawaii/videos>). The webinar meeting apportioned time for oral public comments which were audio recorded per HEPA requirements [HAR §11-200.1-23(d)]. The posters, fact sheet, and flyer included here in Appendix D were presented during webinar scoping sessions and were further made available on the USAG-HI website (<https://home.army.mil/hawaii/index.php/OahuEIS/documents>).

An additional call-in phone number was set up to provide comments via telephone. The telephone line was open from August 10, 2021, 1:00 PM and remained available through August 12, 2021, 11:59 PM to accommodate greater public participation due to the uncertainty of fluctuating gathering limits/restrictions due to the corona-virus and in response to concerns on accessibility for digitally disadvantaged members of the public. Audio recordings for both webinar (“Oral”) and phone line (“Other”) comment submission methods are included in Appendix E, Scoping Comments and Responses. The following is a written general summary of the oral comments received during the public meetings, including phone recordings.

Eighty-five comments were provided from 76 unique commenters via the webinar scoping sessions over the course of two evenings—August 10 and 11. Both public scoping meetings were about three-hour long between 6:00 PM and 9:00 PM with additional time at either end to receive public comments. Approximately 107<sup>1</sup> comments were provided via phone message over the course of 2.5 days—August 10, 1:00 PM through August 12, 11:59 PM. In total, there were 192 comments that constitute the Oral and Other comments received during the public meetings.<sup>2</sup>

Roughly one-third of the 192 comments received were classified as “Support No Action,” which correlates with the No Action Alternative where the Army would not retain any of the State-owned lands at Kahuku Training Area, Kawailoa-Poamoho Training Area, and Mākua Military Reservation. With the exception of 10 neutral comments, the remainder of comments were opposed to the Proposed Action.

Many of the phone calls were similar in content which seemed to be variations of a standardized script<sup>3</sup>:

*“My name is \_\_\_\_\_ and I am a resident of \_\_\_\_\_ and I strongly oppose the extension of the military leases on the lands of Mākua, Kahuku, and Wahiawā.*

*Extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of native Hawaiian plants, animals and continually disrupt the lives of the local communities.*

*The Army has wrongfully leased these lands from the state for \$1 since 1964. When the leases expire in 2029, this land should be immediately restored to the public.”*

Common themes were shared amongst the public commenters, including 46 commenters who were concerned about damage to the natural habitat impacting native Hawaiian plants and animals, and 34 commenters who stated that military activities disrupt the lives of the local community. Approximately 30 commenters expressed that the land was unfairly or wrongfully leased for \$1 since the 1960s. The same commenters stated specifically that the land should be returned to the public or specifically “native Hawaiians”—a couple commenters elaborated that the families with direct lineage to original residents in Makua who were displaced should be the appropriate party to engage (i.e. rather than State agencies). Many commenters expressed support for Hawaiian sovereignty land rights (i.e. illegal occupation by the U.S.), a belief that military land use was not productive and antagonistic towards the land itself. There were additional concerns for environmental justice infringements on native Hawaiians who may bear a disproportionate burden of impacts.

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<sup>1</sup> 108 messages were received, but one was a blank/empty recording.

<sup>2</sup> Period for receiving oral comments by phone was extended by approximately 30 hours beyond the public meetings.

<sup>3</sup> These comments did mention resource area topics that will be covered in the Draft EIS (e.g., biological resources) however they lacked the specificity needed to be tied directly to those resource areas and were thus classified as general opposition to the action alternatives.



Approximately 20 commenters raised concerns about biological resources; in particular, four commenters requested information on the status of endangered plants and animals (Native Hawaiian birds, mammals, insects and gastropods affected—i.e. rare Mākua Valley tree snail).

Fifteen commenters were concerned that the Army’s use of heavy equipment and munitions may generate chemicals that have contaminated soils, groundwater, ocean, and marine resources.

At least ten commenters mentioned cultural resource and/or public access issues, particularly to ancestral/cultural sites and “inefficient” access trails. Four commenters mentioned the sacredness and cultural significance of the lands at Makua and at least one mentioned the Army’s mismanagement of cultural sites.

Approximately seven commenters directly mentioned the need for cleanup, restoration and conservation of these lands. Three commenters specifically mentioned the dangers of unexploded ordnance.

At least seven commenters discussed the military’s impacts to global climate change.

Three commenters requested specific alternative land uses in order to reduce global warming impacts and/or provide opportunities for education for on farming, fishing, and gathering.

Two commenters mentioned military servicemen’s acts of violence against women and children, and that military training sites create a demand hub for sex trafficking. Two other commenters opposed military training use on the basis that it would further war crimes.

One commenter conveyed concern about invasive species (i.e. devil weed) having been introduced and overtaking the landscape; and another commenter specifically addressed soil erosion and the lack of vegetation causing unfavorable dust-wind conditions and invasive species being more prone to wildfires. One commenter requested that ownership of mineral rights—land, air and sea mineral rights—be investigated to create a treaty with the U.S. government.

A few webinar commenters conveyed an expectation that the chat function should be enabled and that video should be available so that the faces of those providing public comments would be visible to others to better emulate an in-person meeting. A few also expressed disappointment that public meetings were not held in the neighborhoods closest to the training areas.

Specific resources identified for analysis in the EIS included:

- Air quality. Evaluate contribution of air pollutants and greenhouse gas emissions.
- Air space. Examine flight paths over residences creating disturbances, rather than passing over agricultural lands (differentiated from other service groups).
- Biological Resources. Assess long-term effects on native plant and animal populations; status of the rare tree snail in Makua Valley, endangered species, and invasive species.
- Hazardous Materials and Waste. Discuss munitions, unexploded ordnance left from military live-fire training and/or testing, and open burning/detonation treatment and cleanup.
- Noise. Analyze noise pollution from helicopters and gunfire as sources of stress.

- Water. Identify military activity impacts on surface and groundwater in and around the three training areas.

Per HAR §11-200.1-23(c) and (d) and HAR §11-200.1-24(s), this summary of the oral scoping comments and the audio files of the original recordings will be submitted with the Draft EIS submittal to the State's Office of Planning and Sustainable Development Environmental Review Program (formerly the State Department of Health Office of Environmental Quality Control).

**Posters**

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# Welcome to the Environmental Impact Statement (EIS) Public Scoping Process

## Agenda

- Welcome/Logistics
- Opening Remarks
- Overview of Public Scoping
- How Do I Submit Comments?
- National Environmental Policy Act (NEPA) and Hawai'i Environmental Policy Act (HEPA)
- Environmental Impact Statement (EIS) Process
- Project Background
- Overview of Training Lands
- Proposed Action: Purpose and Need
- Description of Alternatives
- Environmental Topics



# Overview of Public Scoping

Your input is valuable and your time is appreciated

## What is Public Scoping?

Public scoping is an early and open process, conducted in compliance with NEPA and HEPA to identify issues and alternatives to be addressed in the EIS.

Public scoping allows the public to:

- Learn about the proposed action
- Identify concerns
- Provide new information or suggestions
- Provide comments

## What to Expect after Scoping?

After the public scoping period has ended, the Army will incorporate public input into the development of the Draft EIS. The Draft EIS will be made available for public review for 45 days at the end of 2022/early 2023. The Army will then incorporate public input into development of the Final EIS. A Record of Decision will be issued no sooner than 30 days after the Final EIS is released.

## Public Scoping Open House

Due to COVID-19 restrictions, this is not a traditional Open House event, but instead consists of two hybrid in-person/online public scoping sessions to allow the most public input by the safest means during the allotted time.

- View online presentations and project documents at: <https://home.army.mil/hawaii/index.php/OahuEIS>
- Attend one of the public scoping sessions on August 10 and 11, 2021, 6 - 9 p.m.
  - In person:  
Leilehua Golf Course  
199 Leilehua Golf Course Rd., Wahiawa, HI 96786
  - Online: View and/or listen via live stream at: <https://home.army.mil/hawaii/index.php/OahuEIS>



# How Do I Submit Comments?

Your input is valuable and your time is appreciated

## Options To Submit Written Comments

Comment period is July 23 - September 1, 2021.

- In person: Attend a public scoping session. Detailed information available at: <https://home.army.mil/hawaii/index.php/OahuEIS>
- Online at <https://home.army.mil/hawaii/index.php/OahuEIS>
- Via email: [usarmy.hawaii.nepa@mail.mil](mailto:usarmy.hawaii.nepa@mail.mil)
- Via mail: O'ahu ATLR EIS Comments  
P.O. Box 3444  
Honolulu, HI 96801-3444



Scan with smartphone to be directed to  
the O'ahu EIS website.

## Options To Submit Oral Comments

- In person: Attend a public scoping session
- Via phone: Call (808) 556-8277 to provide oral comments from 4 - 9 p.m.  
(only available on August 10 and 11)

*Note: Comment submittal through the online form is preferred. However, 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 be maintained for the record and will not be released unless required by law.*



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

## What is NEPA?

- NEPA is a federal law that requires preparation of an EIS for major federal actions.
- NEPA procedures ensure environmental information is available to public officials and citizens before decisions are made, and before actions are taken.

## What is HEPA?

- HEPA is a state law that requires Hawai'i state agencies to consider impacts from state actions on the environment in an EIS.
- The proposed action includes State-owned land and will comply with HEPA provisions.



Natural resource management on O'ahu  
Photo Credit: U.S. Army

This EIS will be a joint NEPA-HEPA document and public involvement processes for both will run concurrently.

## NEPA/HEPA Public Involvement

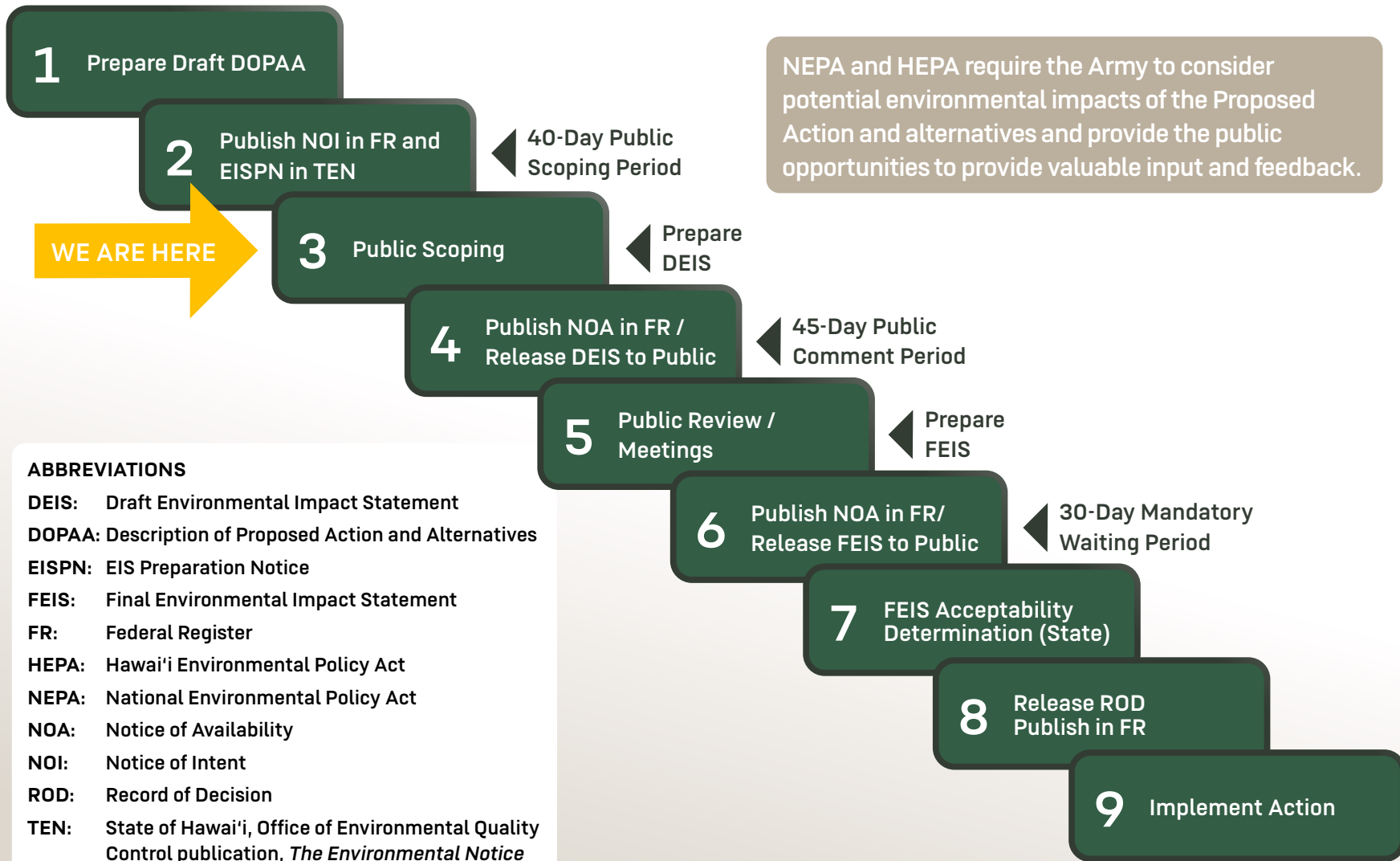
Public involvement is a key component of the NEPA and HEPA public processes. The EIS process includes several opportunities for public involvement:

- A 40-day public scoping period for NEPA NOI and HEPA EIS Preparation Notice.
- EIS Scoping Open House with in-person scoping sessions and oral comment phone line.
- HEPA Cultural Impact Assessment
- Draft EIS notice with a 45-day comment period and public meetings.





# Environmental Impact Statement (EIS) Process



## 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 Control publication, *The Environmental Notice*



# Project Background: Why Retain State Lands on O'ahu?

## ARMY LEASES EXPIRING

The U.S. Government uses approximately 18,060 acres for military training purposes at Kahuku Training Area, Kawaihoa-Poamoho Training Area (Poamoho), and Makua Military Reservation where the Army has been for the past six decades. Of these lands, approximately 6,300 acres are leased from the State through 65-year leases which expire on August 16, 2029. The Proposed Action is to retain these State-owned lands for continued use as Army training lands.

## STATE-OWNED LANDS ESSENTIAL TO TRAINING

The State-owned lands have been the keystone of training on O'ahu, supporting numerous training activities, maneuver areas, and capabilities that are essential to the Army, other military services, and local agencies.

## IMPACTS TO MISSION

Loss of these lands would reduce the ability of the Army, other military services, and local agencies to meet their training requirements and mission readiness.



Photo Credit: U.S. Army



## Overview: Kahuku Training Area

### State-Owned Land at Kahuku Training Area (KTA)

- Located in the northern end of the Ko'olau Mountains in northeast O'ahu.
- Consists of approximately 9,480 acres, with 1,170 acres leased from the State.
- Includes Tract A-1 (450 acres) and Tract A-3 (720 acres).
- Used for ground maneuver and helicopter flight training.
- Contains training areas as well as landing zones, access gates, and range roads.
- Portions are used by the public on weekends for recreation such as motocross, hunting, and hiking.

*Note: Approximate acreages were calculated using geographical information systems (GIS).*



Photo Credit: U.S. Army



## Overview: Kawaihoa-Poamoho Training Area

### State-Owned Land at Kawaihoa-Poamoho Training Area (Poamoho):

- Located in central O'ahu on the western slope of the Ko'olau Mountains.
- Comprises approximately 4,370 acres and is entirely owned by the State.
- Includes the Poamoho Tract (3,150 acres) and the Proposed State Natural Area Reserve (NAR) Tract (1,220 acres).
- Used for low-altitude helicopter flight training.
- Public hiking and hunting are allowed on weekends and holidays.

*Note: Approximate acreages were calculated using GIS.*



Photo Credit: U.S. Army



# Overview: Makua Military Reservation

## State-Owned Land at Makua Military Reservation (MMR):

- Located in northwest O'ahu, overlapping Makua Valley and Kahanahaiki Valley on the western flank of the Wai'anae Mountain Range.
- Comprises approximately 4,190 acres with approximately 760 acres leased from the State.
- Includes areas designated in the EIS as Makai, North Ridge, Center and South Ridge Tracts.
- Used for maneuver, aviation, and assembly area operations training.
- The U.S. Government maintains infrastructure such as training ranges and objectives, and range roads/ firebreaks.

*Note: Approximate acreages were calculated using GIS.*



Photo Credit: U.S. Army



## Proposed Action: Purpose and Need

### Proposed Action

- The Army would retain up to approximately 6,300 acres of State-owned lands on O'ahu in support of continued military training. Multiple land retention methods could be used and will be determined after ROD.
- The Army would retain the State-owned lands prior to the end of the current lease to limit disruption to training.
- After retention of the State-owned lands, Army would continue to conduct the current levels and types of military training; facility, utility and infrastructure maintenance and repair activities; natural and cultural resources stewardship and mitigation; and conduct the management of land for other users.
- The Proposed Action does not involve new training, construction, or resource management activities. The EIS will analyze live fire training at MMR at a programmatic level. If the Army proposes a resumption of live fire at MMR, it would also be subject to further separate and more detailed NEPA analysis.

### Purpose of the Proposed Action

To secure long-term military use of the State-owned lands, for which current leases expire in 2029.

### Need for the Proposed Action

To allow the military to continue to meet current and future training and combat readiness requirements on Army-managed lands in Hawai'i.



# Description of Alternatives

## Alternative 1: Full Retention

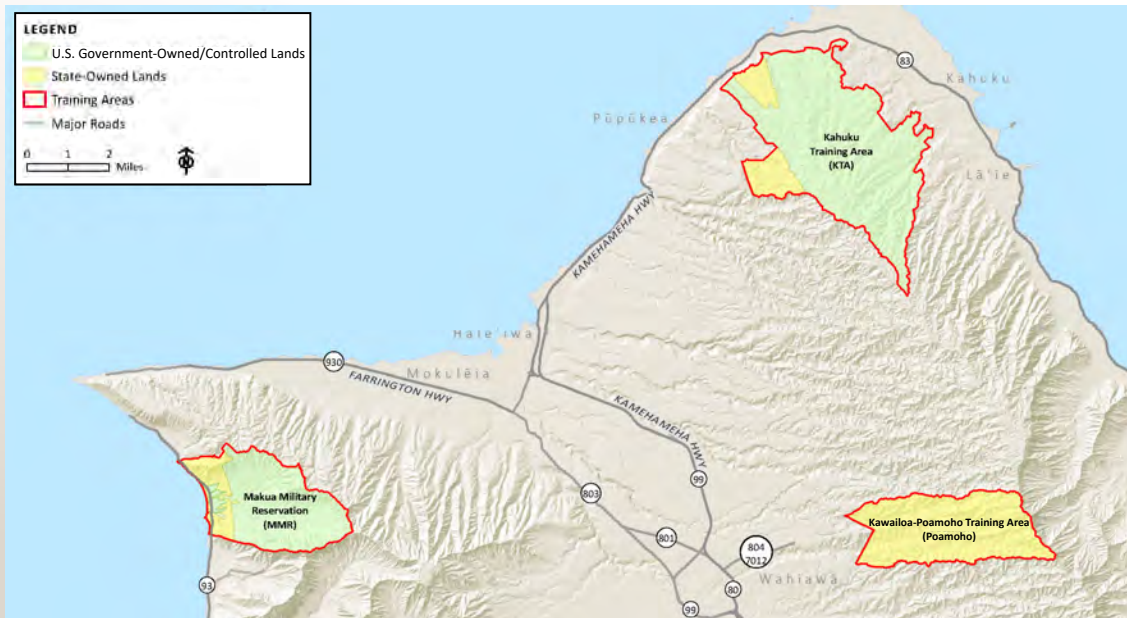
Under Alternative 1, all State-owned lands would be retained. This alternative allows the Army to retain the significant investment in facilities and infrastructure, continue military training without downtime, and allow for future modernization.

## Alternative 2: Modified Retention

Under Alternative 2, the Army would retain State-owned lands within each training area except for land on which limited training occurs.

## Alternative 3: Minimum Retention and Access

Under Alternative 3, the Army would retain the minimum amount of State-owned land that is required to continue to meet its training requirements. This includes retaining appropriate training/support facilities, infrastructure, maneuver training land, and access to these features. This alternative does not apply to all the training areas.



Map Credit: G70

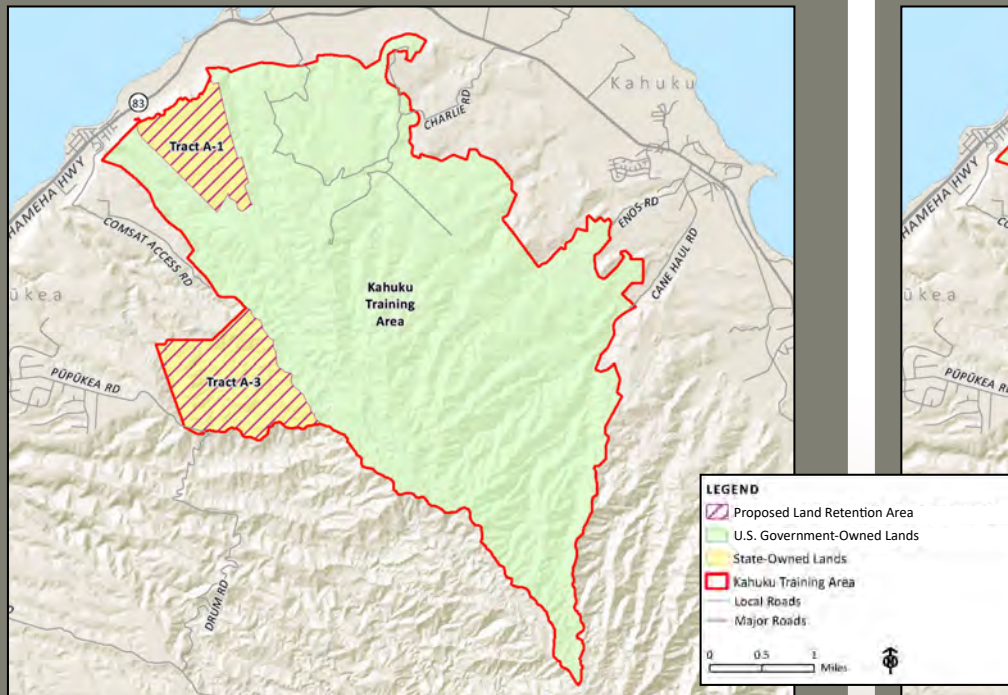
## No Action Alternative

Under the No Action Alternative, the Army would not retain any of these State-owned lands.



# Kahuku Training Area (KTA) Alternatives 1 and 2

## KTA Alternative 1: Full Retention



Map Credit: G70

Under Alternative 1, the Army would retain all State-owned land including both Tract A-1 and Tract A-3.

## KTA Alternative 2: Modified Retention



Map Credit: G70

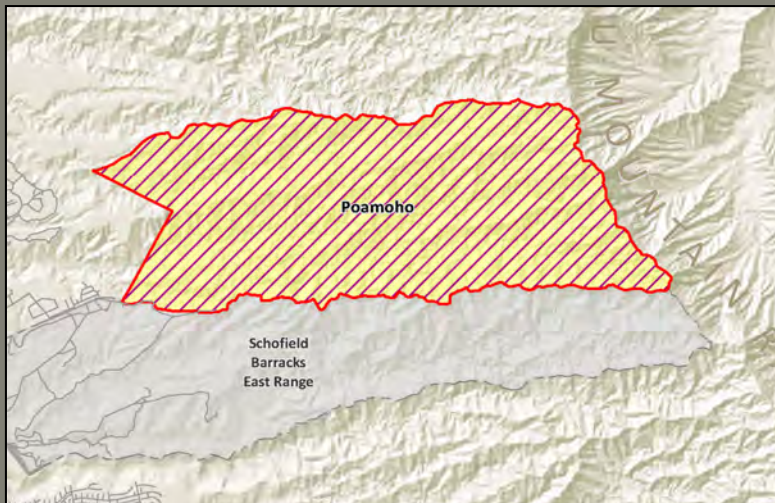
Under Alternative 2, the Army would retain Tract A-1 but would not retain Tract A-3.





# Kawailoa-Poamoho Training Area (Poamoho) Alternatives 1 and 2

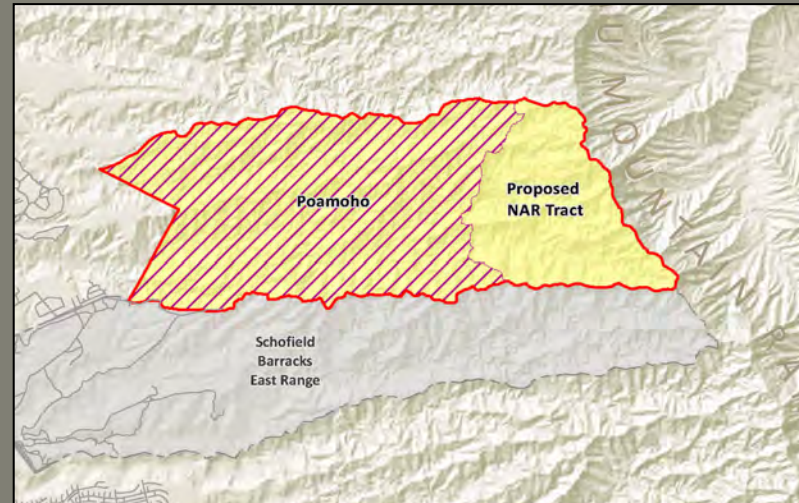
## Poamoho Alternative 1 Full Retention



Map Credit: G70

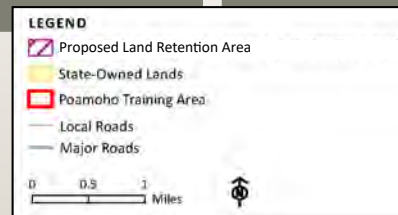
Under Alternative 1, the Army would retain all State-owned land including the Poamoho Tract and the Proposed NAR Tract.

## Poamoho Alternative 2 Modified Retention



Map Credit: G70

Under Alternative 2, the Army would retain the Poamoho Tract but would not retain the Proposed NAR Tract.





# Makua Military Reservation (MMR) Alternatives 1, 2, and 3

## MMR Alternative 1 Full Retention



Map Credit: G70

Under Alternative 1, the Army would retain all State-owned land at MMR.

## MMR Alternative 2 Modified Retention



Map Credit: G70

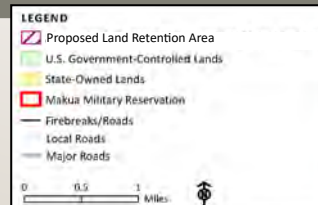
Under Alternative 2, the Army would retain the North Ridge Tract, Center Tract, and South Ridge Tract.

## MMR Alternative 3 Minimum Retention



Map Credit: G70

Under Alternative 3, the Army would retain only the Center Tract.





# 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



Archaeological resources, traditional religious and cultural properties, and other valued resources, traditional and customary cultural practices, historic buildings and structures

## 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



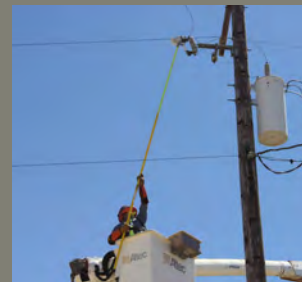
Surface water, groundwater, floodplains, marine resources, and Clean Water Act

## Noise



Noise zones, community and wildlife impacts

## Utilities



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

## Health & Safety



Human health and safety, and safety danger zones

## Hazardous Materials



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

## Socioeconomics



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

## Transportation & Traffic



Traffic, roadways, and air transportation, traffic volume and level of congestion

## Electromagnetic Spectrum



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

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# **Fact Sheet**

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# Army Training Land Retention at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Makua Military Reservation, Island of O'ahu

## FACT SHEET

### ENVIRONMENTAL IMPACT STATEMENT

The Army is preparing an Environmental Impact Statement (EIS) for Army Training Land Retention of State Lands at Kahuku Training Area (KTA), Kawaihoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O'ahu. The Army proposes to retain up to approximately 6,300 acres of State-owned lands at KTA, Poamoho, and MMR to support continued military training.

The Council on Environmental Quality provides guidance for the EIS process under the implementing regulations of the National Environmental Policy Act (NEPA) in Title 40 Code of Federal Regulations (CFR) Parts 1500–1508 and the Army NEPA Regulations in Title 32 CFR Part 651. This EIS will also 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.

One of the first steps in the NEPA and HEPA processes is to notify the public of the intention to prepare an EIS. This occurs through a Notice of Intent (NOI) in the Federal Register, and publication of an EIS Preparation Notice (EISPN) in the State of Hawai'i's Office of Environmental Quality Control's (OEQC) semi-monthly publication, The Environmental Notice.

### BACKGROUND

KTA, Poamoho, and MMR are comprised of approximately 18,060 acres of U.S. Government and State-owned lands on the island of O'ahu. The Army's authority to use the State-owned lands is through leases which were initiated in 1964 to support mission-critical training capabilities, training facilities, operations, access, and other essential military training and logistics services. Much of the leased lands supplement U.S. Government-owned training land by providing maneuver area and key training features that complement larger activities that take place on U.S. Government-owned lands. The leased lands provide unique military training environments not available elsewhere on military installations in Hawai'i. Other portions of the leased lands allow for access within and between U.S. Government-owned training lands, access to public rights-of-way, or buffer zones between Army and non-Army land uses.

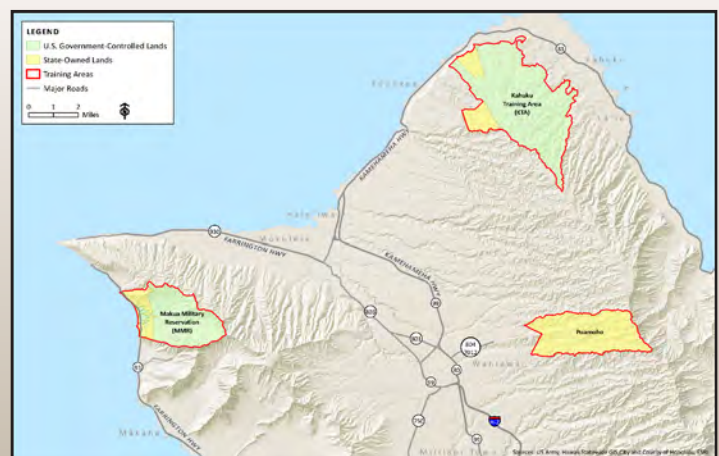
The U.S. Government leases approximately 6,300 acres of these lands from the State consisting of portions of KTA and MMR, and all of Poamoho. The 65-year leases of the State-owned lands expire in 2029. Loss of these lands would greatly impact the Army's and other military services' ability to train in Hawai'i and prepare for mission readiness, because these areas include important facilities and infrastructure for ground maneuver and aviation training.

### PROPOSED ACTION AND ALTERNATIVES

The EIS will evaluate the reasonably foreseeable impacts of a range of alternatives that meet the purpose and need of the Proposed Action. The Proposed Action is the retention of State-owned lands to allow the military to continue to meet current and future training and combat readiness requirements. Alternatives considered in the EIS include Full Retention, Modified Retention, Minimum Retention and Access, and No Action. The Proposed Action does not involve new training, construction, or resource management activities.

- Under Full Retention the Army would retain all State-owned lands within each training area.
- Under Modified Retention the Army would retain all State-owned land within each training area except lands on which limited training occurs.
- Under Minimum Retention and Access, the Army would retain the minimum amount of State-lands within each training area that is required for the Army in Hawai'i to continue to meet its current ongoing training requirements. This includes State-owned lands with the most vital training/support facilities, infrastructure, maneuver land, U.S. Government-owned utilities, and access to these features. Other reasonable alternatives meeting the Army's mission raised during the scoping process and capable of meeting the Army mission, project purpose, and need will also be considered for evaluation in the EIS.
- Under No Action, the leases would expire in 2029 and leased lands would not be retained.

The EIS will analyze live-fire training at MMR at a programmatic level. If the Army proposes a resumption of live-fire at MMR, it would also be subject to further separate and more detailed NEPA analysis.



Location Map



# Army Training Land Retention at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Makua Military Reservation, Island of O'ahu

## FACT SHEET

### NEPA/HEPA PUBLIC PARTICIPATION PROCESS

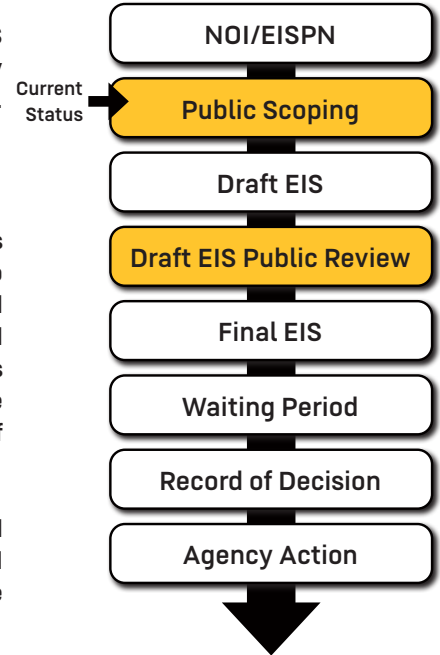
The NEPA/HEPA timeline (to the right) shows opportunities for public input in gold. The EIS is currently in the Public Scoping period—during which the public provides comments on key issues of concern and potential impacts to be considered in the development of the Draft EIS.

### 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 to 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 that should be addressed in the EIS.

The public scoping process began with the publication of the NOI in the Federal Register and publication of the EISPN in State of Hawai'i's The Environmental Notice. 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 September 1, 2021.

### NEPA/HEPA STEPS



### PUBLIC SCOPING OPEN HOUSE

Due to COVID-19 restrictions, this will not be a traditional Open House event, but instead will consist of two hybrid in-person/online public scoping sessions to allow the most public input by the safest means during the allotted time.

- View online presentations and project documents at: <https://home.army.mil/hawaii/index.php/OahuEIS>

Attend one of the public scoping sessions on August 10 and 11, 2021, 6 - 9 p.m.

- In person:**  
Leilehua Golf Course  
199 Leilehua Golf Course Rd.,  
Wahiawa, HI 96786
- Online:** View and/or listen via live stream, at:  
<https://home.army.mil/hawaii/index.php/OahuEIS>



Scan with smartphone to be directed to the O'ahu EIS website.

### HOW TO SUBMIT WRITTEN COMMENTS

Comment Period is July 23 - September 1, 2021

- In person:** Attend a public scoping session. Detailed information available at: <https://home.army.mil/hawaii/index.php/OahuEIS>
- Online:** through website (above) or QR code (to the left)
- Via email:** [usarmy.hawaii.nepa@mail.mil](mailto:usarmy.hawaii.nepa@mail.mil)
- Via U.S. mail:** O'ahu ATLR EIS Comments  
P.O. Box 3444  
Honolulu, HI  
96801-3444

### FOR MORE INFORMATION OR ACCESSIBILITY REQUESTS

U.S. Army Garrison Hawaii Public Affairs Office  
Email: [usarmy.hawaii.comrel@mail.mil](mailto:usarmy.hawaii.comrel@mail.mil) Phone: (808) 656-3158

*Note: Comment submittal through the online form is preferred. However, 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 be maintained for the record and will not be released unless required by law.*

### HOW TO SUBMIT ORAL COMMENTS

(only available on August 10 and 11)

- In person:** Attend a public scoping session
- Via phone:** Call (808) 556-8277 to provide oral comments from 4 - 9 p.m.



**Flyer**

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# Army Training Land Retention at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Makua Military Reservation, Island of O'ahu

## 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 Kahuku Training Area (KTA), Kawaihoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O'ahu. The Army proposes to retain up to approximately 6,300 acres of State-owned lands at these locations, for which current leases expire in 2029.

The Army is initiating an EIS process under the National Environmental Policy Act (NEPA), guided by Title 40 Code of Federal Regulations (CFR) Parts 1500-1508, and Army NEPA Regulations in Title 32 CFR Part 651. The EIS will also 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, economic, and technical areas of concern are given appropriate consideration in decision making.

## 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 to be addressed in the EIS. Federal, State, and local agencies, Native Hawaiian organizations, and the public are invited to participate in the scoping process. The Army is providing opportunities for public input during the scoping process by facilitating a hybrid in-person/online EIS Scoping Open House consisting of public scoping sessions, subject to COVID-19 limitations.

## REVIEW PROJECT INFORMATION

Information provided at the public scoping sessions will be available online at:

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

Hard copies will be available at the public scoping sessions or may be requested from the U.S. Army Garrison Hawaii Public Affairs Office at [usarmy.hawaii.comrel@mail.mil](mailto:usarmy.hawaii.comrel@mail.mil).

## EIS PUBLIC SCOPING OPEN HOUSE

Due to COVID-19 restrictions, this will not be a traditional Open House event, but instead will consist of two hybrid in-person/online public scoping sessions to allow the most public input by the safest means during the allotted time.

- ▶ Attend a public scoping session or view online presentations and project documents at: <https://home.army.mil/hawaii/index.php/OahuEIS>

August 10 and 11, 2021  
6-9 p.m.

Leilehua Golf Course  
199 Leilehua Golf Course Rd.,  
Wahiawa, HI 96786

Live stream available  
(See website for details)



Scan with smartphone to be directed to the O'ahu EIS website

## OPTIONS TO SUBMIT COMMENTS

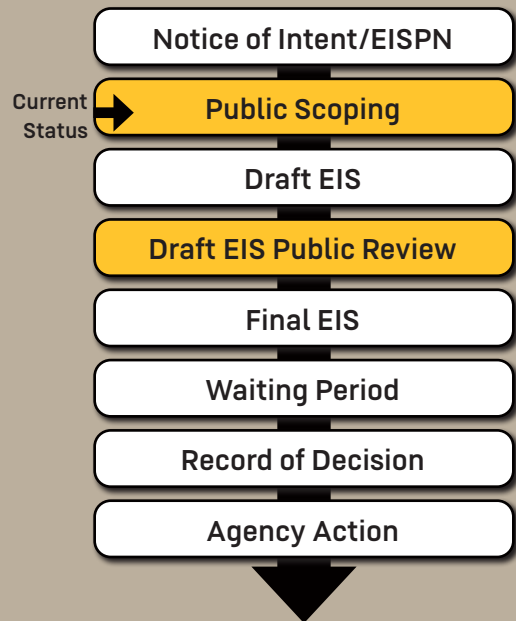
Comment period is July 23 - September 1, 2021.

- ▶ Via public scoping session (written or oral)
- ▶ Online at: <https://home.army.mil/hawaii/index.php/OahuEIS>
- ▶ Via email: [usarmy.hawaii.nepa@mail.mil](mailto:usarmy.hawaii.nepa@mail.mil)
- ▶ Via mail: O'ahu ATRL EIS Comments  
P.O. Box 3444  
Honolulu, HI 96801-3444
- ▶ Via phone: August 10 and 11,  
4 - 9 p.m. at (808) 556-8277.

*Note: Comment submittal through the online form is preferred. However, 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 be maintained for the record and will not be released unless required by law.*

## NEPA/HEPA STEPS

The timeline below shows opportunities for public input in gold.



## FOR MORE INFORMATION OR ACCESSIBILITY REQUESTS

U.S. Army Garrison Hawaii Public Affairs Office  
Email: [usarmy.hawaii.comrel@mail.mil](mailto:usarmy.hawaii.comrel@mail.mil)  
Phone: (808) 656-3158

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**Direct Mail Postcard**

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**Army Training Land Retention at Kahuku Training Area,  
Kawailoa-Poamoho Training Area, and Makua Military Reservation, Island of O'ahu**

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

The Army proposes to retain up to approximately 6,300 acres of State-owned land at Kahuku Training Area (KTA), Kawailoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O'ahu 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 socioeconomic issues are given appropriate consideration in decision making. The Army is seeking public comments during the EIS scoping period from July 23 - September 1, 2021, 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/OahuEIS>.

**PUBLIC SCOPING OPEN HOUSE**

Due to COVID-19 restrictions, this will not be a traditional Open House event, but instead will consist of two hybrid in-person/online public scoping sessions to allow the most public input by the safest means during the allotted time.

Attend one of the public scoping sessions on August 10 and 11, 2021, 6 - 9 p.m.

- In person:  
Leilehua Golf Course  
199 Leilehua Golf Course Rd., Wahiawa, HI 96786
- Online: View and/or listen via live stream, or review presentations and project documents at:  
<https://home.army.mil/hawaii/index.php/OahuEIS>

For further information, or for accessibility requests, contact:  
U.S. Army Garrison Public Affairs Office  
Email: [usarmy.hawaii.comrel@mail.mil](mailto:usarmy.hawaii.comrel@mail.mil)  
Phone: (808) 656-3158

**OPTIONS TO SUBMIT COMMENTS**

Comment period is July 23 - September 1, 2021.

- Public scoping session (in person)
- Online at:  
<https://home.army.mil/hawaii/index.php/OahuEIS>
- Via email: [usarmy.hawaii.nepa@mail.mil](mailto:usarmy.hawaii.nepa@mail.mil)
- Via mail: O'ahu ATLR EIS Comments  
P.O. Box 3444  
Honolulu, HI 96801-3444
- Via phone: August 10 and 11,  
4 - 9 p.m. at (808) 556-8277



NEPA Program Manager,  
U.S. Army Garrison Hawaii  
Directorate of Public Works - Environmental  
947 Wright Avenue, BLDG 105, 3rd Floor (WAAF)  
Schofield Barracks, HI 96857-5013



# **Draft EIS Meeting Materials**

Posters

Fact Sheet

Flyer

Direct Mail Postcard

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**Posters**

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# Welcome to the Draft EIS Public Meeting

## What are Draft EIS Public Meetings?

The Army has prepared a Draft EIS to analyze the impacts of retaining State-leased land on O'ahu. 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.

The Draft EIS and additional materials are available on the EIS website at <https://home.army.mil/hawaii/OahuEIS> as well as at four public libraries: Hawai'i Documents Center at the Hawai'i State Library, Kahuku Public Library, Wahiawā Public Library, and Wai'anae Public Library.

## What to Expect after Public Comment Period?

After the 60-day public comment period has ended, the Army will consider all public comments and incorporate substantive public input into the development of the Final EIS. The Army's decision will then 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 June 7 – August 7, 2024

- In-person: attend a public meeting
- EIS website: <https://home.army.mil/hawaii/OahuEIS>
- Email: ATLR-Oahu-EIS@g70.design
- Phone: (808) 515-5518
- Mail: ATLR O'ahu EIS Comments  
P.O. Box 3444  
Honolulu, HI 96801-3444



Scan with smartphone  
to be directed to the  
O'ahu 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. July 9, 6-8 PM – Wai'anae District Park Multi-Purpose Room
2. July 10, 6-8 PM – Kahuku High and Intermediate School
3. July 11, 6-8 PM – Leilehua High School

The public may review the meeting materials for the Draft EIS on the EIS website at: <https://home.army.mil/hawaii/OahuEIS>

*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, as amended.
- 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 343, 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 on O'ahu  
Photo Credit: U.S. Army

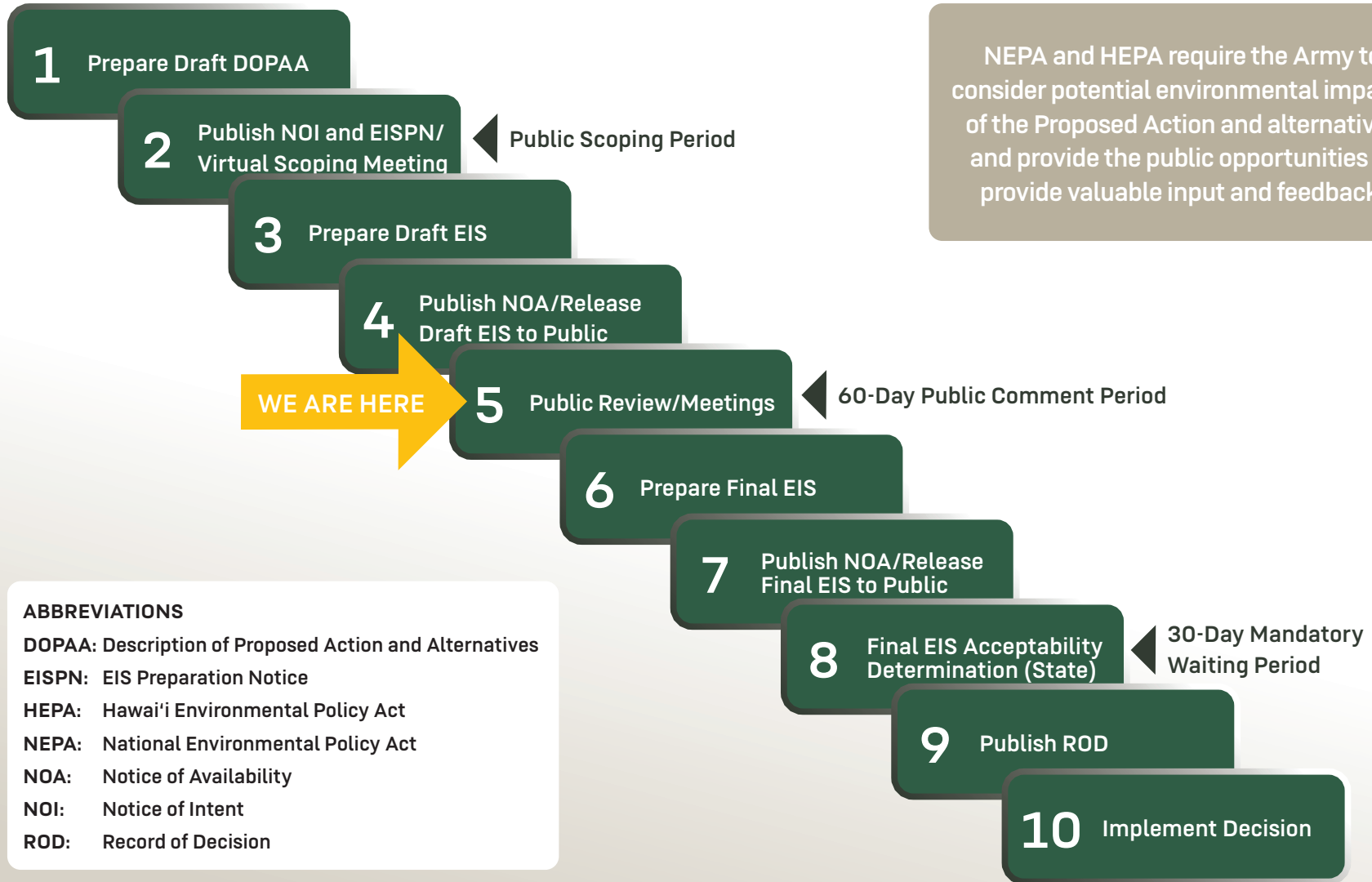
## NEPA/HEPA

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

- A 40-day public scoping period that ran from July 23 to September 1, 2021.
- EIS online scoping meeting with oral comment options via webinar platform or recorded phone line.
- HEPA Cultural Impact Assessment (completed).
- Draft EIS (NOA on June 7, 2024) with a 60-day comment period (from June 7 – August 7, 2024) and public meetings.



# EIS Process





# Military in Hawai'i and KTA, Poamoho, and MMR

## 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 the 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.



Demonstration of a helicopter air-to-ground training military exercise; Soldiers serving Thanksgiving meals to the community. Photo Credit: U.S. Army

## Military Economic Benefits to Hawai'i

- In 2022, there were 68,500 active duty, reserve, and civilian personnel in the State.
- In 2022, the U.S. military paid \$5.3B in wages to defense personnel in the State.
- In 2022, overall defense spending in Hawaii was \$8.8B.

## State-owned Lands at the O'ahu Training Areas are Important to the Military

- Retention of maneuver area on State-owned lands at the O'ahu training areas is important for maneuver and non-live-fire training, and to accommodate company-sized and larger units.
- The O'ahu training areas are used for joint and multinational training exercises.
- Several of the training features and capabilities within the State-owned lands are not available elsewhere within O'ahu.
- Critical U.S. Government-owned facilities and infrastructure are located on the State-owned lands.



# Why Retain State-owned Lands on O'ahu?

## ARMY LEASES EXPIRING

The U.S. Government uses approximately 18,000 acres for military training purposes at Kahuku Training Area, Kawaihoa-Poamoho Training Area (Poamoho), and Makua Military Reservation where the Army has been for the past six decades. Of these lands, approximately 6,322 acres are leased from the State through 65-year leases which expire on August 16, 2029. The Proposed Action is to retain these State-owned lands for continued use as Army training lands.



## STATE-OWNED LANDS ESSENTIAL TO TRAINING

The State-owned lands contain some key training facilities on O'ahu, supporting numerous training activities, maneuver areas, and capabilities that are essential to the Army, other military services, and local agencies.

## IMPACTS TO MISSION

Loss of these lands would reduce the ability of the Army, other military services, and local agencies to meet their training requirements and mission readiness.



## Overview: Kahuku Training Area

### State-Owned Land at Kahuku Training Area (KTA)

- Located in the northern end of the Ko'olau Mountains in northeast O'ahu.
- Consists of approximately 9,480 acres, with 1,150 acres leased from the State.
- Includes Tract A-1 (450 acres) and Tract A-3 (700 acres).
- Used for ground maneuver and helicopter flight training.
- Contains training areas as well as landing zones, access gates, and range roads.
- Portions are used by the public on weekends for recreation such as motocross, hunting, and hiking.



Photo Credit: U.S. Army



## Overview: Kawaiiloa-Poamoho Training Area

### State-Owned Land at Kawaiiloa-Poamoho Training Area (Poamoho):

- Located in central O'ahu on the western slope of the Ko'olau Mountains.
- Comprises approximately 4,390 acres and is entirely owned by the State.
- Includes the Poamoho Tract (3,170 acres) and the Proposed State Natural Area Reserve (NAR) Tract (1,220 acres).
- Used for low-altitude helicopter flight training.



Photo Credit: U.S. Army



# Overview: Makua Military Reservation

## State-Owned Land at Makua Military Reservation (MMR):

- Located in northwest O'ahu, overlapping Makua Valley and Kahanahaiki Valley on the western flank of the Wai'anae Mountain Range.
- Comprises approximately 4,190 acres with approximately 782 acres leased from the State.
- Includes areas designated in the EIS as Makai, North Ridge, Center and South Ridge Tracts.
- Used for maneuver, aviation, and assembly area operations training.
- The U.S. Government maintains infrastructure such as training ranges and objectives, and range roads/ firebreaks.



Photo Credit: U.S. Army



# Proposed Action: Purpose and Need

## Proposed Action

- The Army would retain up to approximately 6,322 acres of State-owned lands on O'ahu in support of continued military training. Multiple land retention methods could be used and will be determined after a final ROD.
- The Army would negotiate with the State to retain the State-owned lands prior to the end of the current lease to limit disruption to training.
- After retention of the State-owned lands, the Army would continue to conduct the current levels and types of military training; facility, utility and infrastructure maintenance and repair activities; natural and cultural resources stewardship and mitigation; and management of land for other users.
- The Proposed Action does not involve new training, construction, or resource management activities. The Army has determined that it will not pursue live-fire training at MMR. It is therefore not reasonably foreseeable and is not analyzed in this EIS.

## No Action Alternative

The Army would not retain any of the State-owned lands on O'ahu after lease expiration.

## Purpose of the Proposed Action

To secure long-term military use of the State-owned lands, for which current leases expire in 2029.

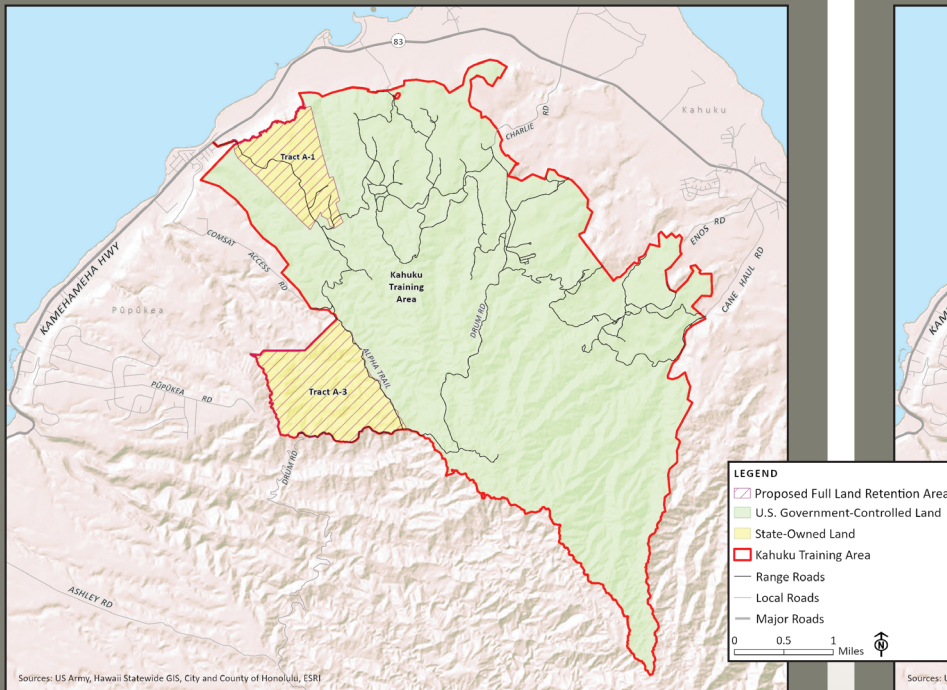
## Need for the Proposed Action

To allow the military to continue to meet current and future training and combat readiness requirements on State-owned lands on Hawai'i.



# Kahuku Training Area (KTA) Alternatives 1 and 2

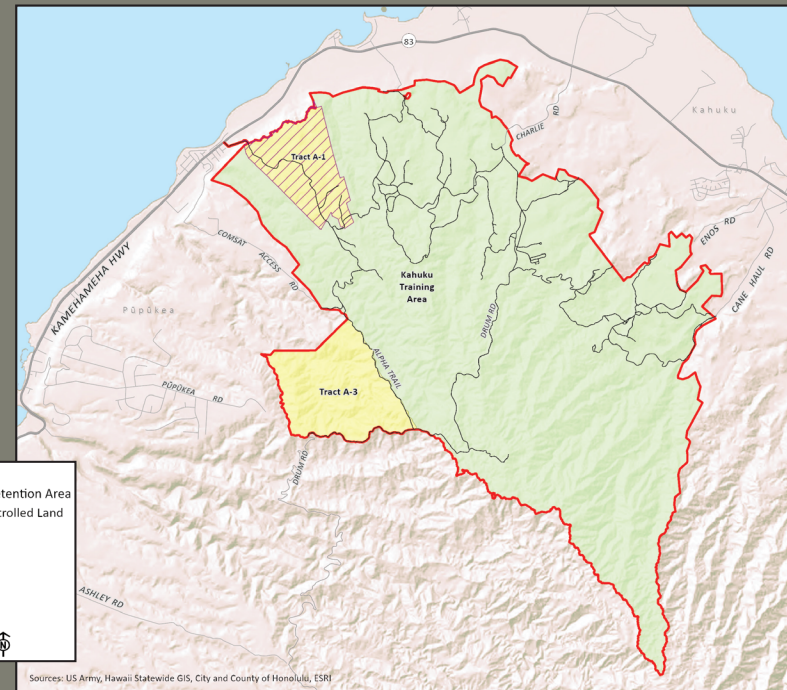
## KTA Alternative 1: Full Retention



Map Credit: G70

Under Alternative 1, the Army would retain all State-owned land including both Tract A-1 and Tract A-3.

## KTA Alternative 2: Modified Retention



Map Credit: G70

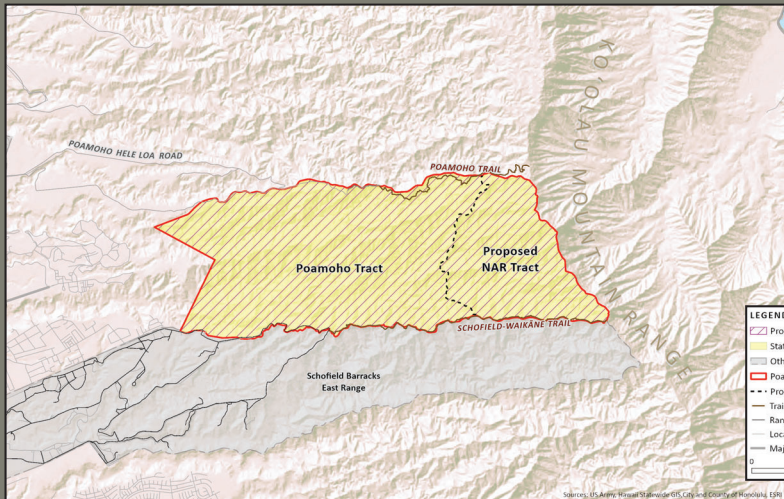
Under Alternative 2, the Army would retain Tract A-1 but would not retain Tract A-3. The Army's Preferred Alternative is Alternative 2.



# Kawailoa-Poamoho Training Area (Poamoho)

## Alternatives 1 and 2

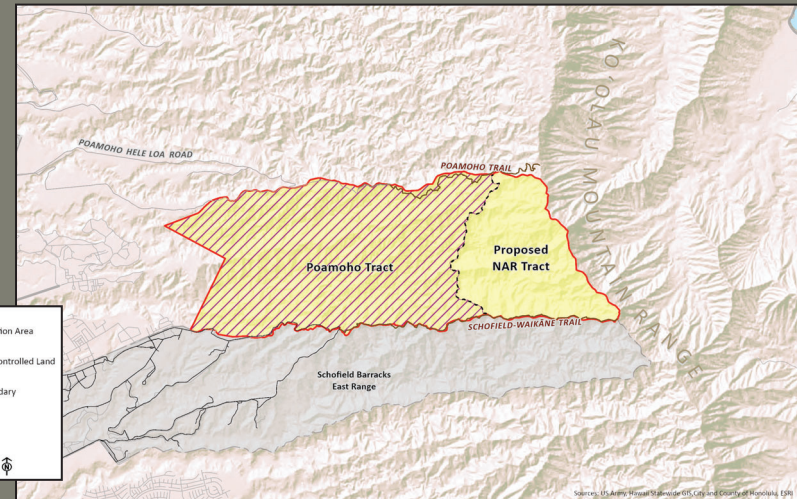
### Poamoho Alternative 1 Full Retention



Map Credit: G70

Under Alternative 1, the Army would retain all State-owned land including the Poamoho Tract and the Proposed NAR Tract.

### Poamoho Alternative 2 Modified Retention



Map Credit: G70

Under Alternative 2, the Army would retain the Poamoho Tract but would not retain the Proposed NAR Tract. The Army's Preferred Alternative is Alternative 2.



# Makua Military Reservation (MMR) Alternatives 1, 2, and 3

## MMR Alternative 1 Full Retention



Map Credit: G70

Under Alternative 1, the Army would retain all State-owned land at MMR.

## MMR Alternative 2 Modified Retention



Map Credit: G70

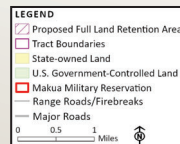
Under Alternative 2, the Army would retain the North Ridge Tract, Center Tract, and South Ridge Tract. The Army's Preferred Alternative is Alternative 2.

## MMR Alternative 3 Minimum Retention



Map Credit: G70

Under Alternative 3, the Army would retain only the Center Tract.







# Analyzed Environmental Topics

## Land Use



Land use compatibility, easements, and real property 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, and unexploded ordnance

## Air Quality and Greenhouse Gases



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

## Noise



Zones and community and wildlife impacts

## Geological & Soil Resources



Bedrock, soil properties, and erosion

## Water Resources



Surface water and groundwater

## Socioeconomics



Demographics, housing, economic development, and recreation

## Environmental Justice



Impacts on communities with environmental justice concerns and protection of children

## Transportation & Traffic



Roadways, traffic volume, and level of congestion

## Human Health & Safety



Army personnel and community health and safety



# Potential Environmental Impacts

Resource	Alternative	KTA	Poamoho	MMR
Land Use	Alternative 1	⊗⊗/⊗	⊗⊗/⊗	⊗⊗/⊗
	Alternative 2	⊗⊗/⊗/+	⊗⊗/⊗/+	⊗⊗/⊗/+
	Alternative 3	N/A	N/A	⊗⊗/⊗/+
	No Action Alternative	+	+	+
Biological Resources	Alternative 1	⊙	⊙	⊙
	Alternative 2	⊙	⊙	⊙
	Alternative 3	N/A	N/A	⊙
	No Action Alternative	⊙	⊙	⊙
Cultural and Historic Resources	Alternative 1	⊙	○	⊙
	Alternative 2	⊙	○	⊙
	Alternative 3	N/A	N/A	⊙
	No Action Alternative	⊙	○	⊙
Cultural Practices	Alternative 1	⊙	⊙	⊗
	Alternative 2	⊙	⊙	⊗/⊗/⊙
	Alternative 3	N/A	N/A	⊗/⊗/⊙
	No Action Alternative	⊙	⊙	+
Hazardous Substances and Hazardous Wastes	Alternative 1	⊙	⊙	⊙
	Alternative 2	⊙	⊙	⊙
	Alternative 3	N/A	N/A	⊙
	No Action Alternative	⊙	○	⊙

⊗ significant adverse impact  
 ⊙ less than significant impact

⊗ significant adverse impact but reduced to less than significant

+ significant beneficial impact  
 ○ no impact

Note: Only one impact symbol is shown where there is no difference between lease, fee simple title and/or land not retained significance impact levels. Where the overall significance impact is different between lease, fee simple title and/or land not retained, all impacts are presented in the table by the following order — i.e., lease impacts/fee simple title impacts/land not retained impacts--and separated by slash marks. Alternative 1 does not have land not retained so only shows lease and fee simple title significance impact levels.



# Potential Environmental Impacts

Resource	Alternative	KTA	Poamoho	MMR
Air Quality and Greenhouse Gases	Alternative 1	⊙	⊙	⊙
	Alternative 2	⊙	⊙	⊙
	Alternative 3	N/A	N/A	⊙
	No Action Alternative	⊙	⊙	⊙
Noise	Alternative 1	⊙	⊙	⊙
	Alternative 2	⊙	⊙	⊙
	Alternative 3	N/A	N/A	⊙
	No Action Alternative	⊙	⊙	⊙
Geology, Topography and Soils	Alternative 1	⊙	⊙	⊙
	Alternative 2	⊙	⊙	⊙
	Alternative 3	N/A	N/A	⊙
	No Action Alternative	⊙	⊙	⊙
Water Resources	Alternative 1	⊙	⊙	⊙
	Alternative 2	⊙	⊙	⊙
	Alternative 3	N/A	N/A	⊙
	No Action Alternative	⊙	⊙	⊙
Socioeconomics	Alternative 1	⊙	⊙	⊙
	Alternative 2	⊙/⊙/⊙	⊙/⊙/⊙	⊙/⊙/⊙
	Alternative 3	N/A	N/A	⊙/⊙/⊙
	No Action Alternative	⊙	⊙	⊙

⊗ significant adverse impact  
 ⊙ less than significant impact

⊖ significant adverse impact but reduced to less than significant

+ significant beneficial impact  
 ○ no impact

Note: Only one impact symbol is shown where there is no difference between lease, fee simple title and/or land not retained significance impact levels. Where the overall significance impact is different between lease, fee simple title and/or land not retained, all impacts are presented in the table by the following order — i.e., lease impacts/fee simple title impacts/land not retained impacts--and separated by slash marks. Alternative 1 does not have land not retained so only shows lease and fee simple title significance impact levels.



# Potential Environmental Impacts

Resource	Alternative	KTA	Poamoho	MMR
Environmental Justice	Alternative 1	⊗	⊗	⊗
	Alternative 2	⊗	⊗	⊗
	Alternative 3	N/A	N/A	⊗
	No Action Alternative	+	+	+
Transportation and Traffic	Alternative 1	⊙	○	⊙
	Alternative 2	⊙	○	⊙
	Alternative 3	N/A	N/A	⊙
	No Action Alternative	⊙	○	⊙
Human Health and Safety	Alternative 1	⊙	⊙	⊙
	Alternative 2	⊙	⊙	⊙
	Alternative 3	N/A	N/A	⊙
	No Action Alternative	⊙	⊙	⊙

⊗ significant adverse impact

⊙ significant adverse impact but  
reduced to less than significant

+ significant beneficial impact

⊙ less than significant impact

○ no impact

Note: Only one impact symbol is shown where there is no difference between lease, fee simple title and/or land not retained significance impact levels. Where the overall significance impact is different between lease, fee simple title and/or land not retained, all impacts are presented in the table by the following order — i.e., lease impacts/fee simple title impacts/land not retained impacts--and separated by slash marks. Alternative 1 does not have land not retained so only shows lease and fee simple title significance impact levels.

ARMY TRAINING LAND RETENTION AT KAHUKU TRAINING AREA,  
KAWAILOA-POAMOHO TRAINING AREA, AND MAKUA MILITARY RESERVATION, ISLAND OF O'AHU



**U.S. ARMY**

**Thank You**

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# **Fact Sheet**

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# Army Training Land Retention of State Lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Makua Military Reservation, Island of O'ahu

## FACT SHEET

### ENVIRONMENTAL IMPACT STATEMENT

The Army has prepared a Draft Environmental Impact Statement (EIS) for Army Training Land Retention of State Lands at Kahuku Training Area (KTA), Kawaihoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O'ahu. The Army proposes to retain up to approximately 6,322 acres of State-owned lands at KTA, Poamoho, and MMR to support continued military training.

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 (CFR) Parts 1500-1508 as amended, and Army NEPA implementing regulations in 32 CFR 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.

### BACKGROUND

KTA, Poamoho, and MMR are comprised of approximately 18,000 acres of U.S. Government-controlled and State-owned lands on the island of O'ahu. The Army's authority to use the State-owned lands is through leases which were initiated in 1964 to support mission-critical training capabilities, training facilities, operations, access, and other essential military training and logistics services. Much of the leased lands supplement U.S. Government-controlled training land by providing maneuver area and key training features that complement larger activities that take place on U.S. Government-controlled lands. Other portions of the leased lands allow for access within and between U.S. Government-controlled training lands, access to public rights-of-way, or buffer zones between Army and non-Army land uses.

The U.S. Government leases approximately 6,322 acres of these lands from the State consisting of portions of KTA and MMR, and all of Poamoho. The 65-year leases of the State-owned lands expire in 2029.

Loss of these lands would impact the Army's and other military services' ability to train in Hawai'i and prepare for mission readiness, and these areas include important facilities and infrastructure for ground maneuver and aviation training.

### PROPOSED ACTION AND ALTERNATIVES

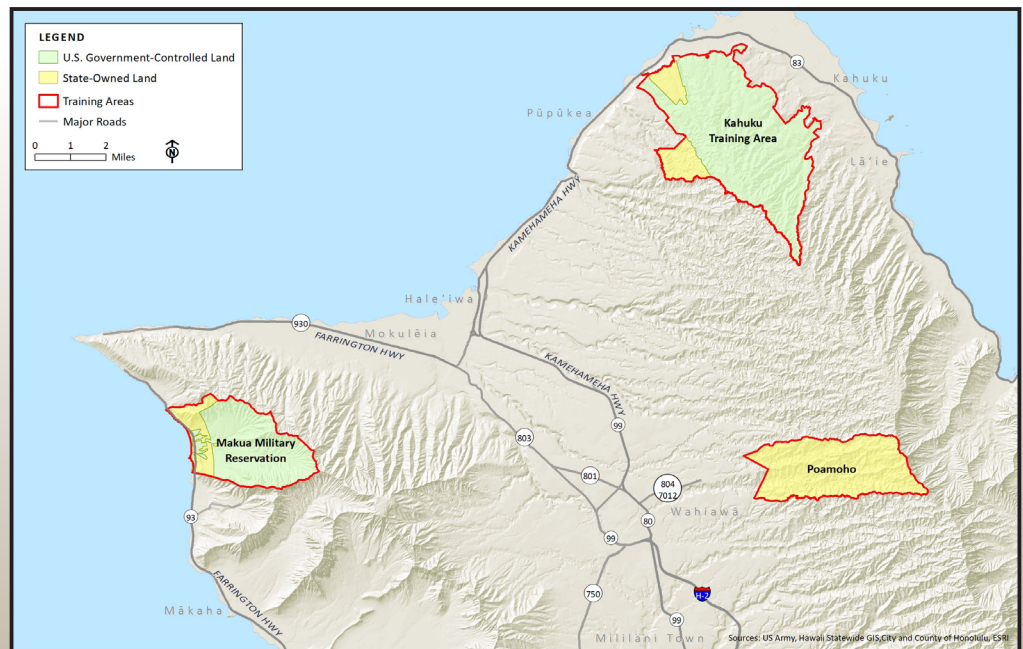
The Draft EIS evaluated the potential direct, indirect, and cumulative impacts of three reasonable alternatives that meet the purpose and need of the Proposed Action, in support of continued military training to meet ongoing training requirements. Alternatives analyzed in the EIS include:

- (1) Alternative 1: Full Retention (6,322 acres): KTA - 1,150 acres, Poamoho - 4,390 acres, MMR - 782 acres;
- (2) Alternative 2: Modified Retention (4,192 acres): KTA - 450 acres, Poamoho - 3,170 acres, MMR - 572 acres; and
- (3) Alternative 3: Minimum Retention: applies to MMR only, 162 acres and 2.4 miles of range and firebreak roads.

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 Draft EIS will inform updates for the Final EIS.

The EIS does not consider future live-fire activities as part of its training program because the Army is no longer pursuing the continuation of live-fire training activities at MMR.





# Army Training Land Retention of State Lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Makua Military Reservation, Island of O'ahu

## FACT SHEET

### NEPA/HEPA PUBLIC PARTICIPATION PROCESS

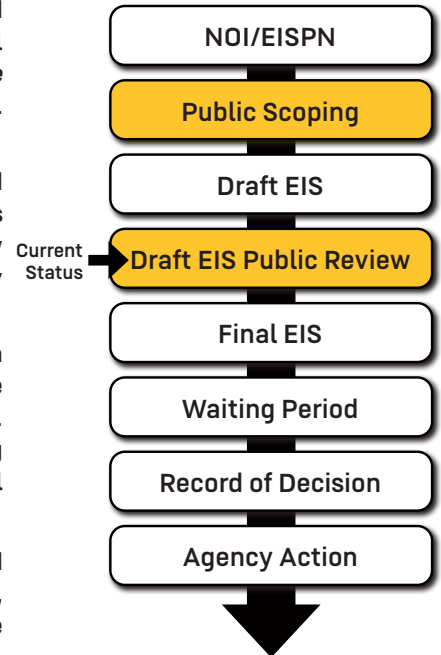
The NEPA/HEPA process provides opportunities for public input during project scoping and following publication of the Draft EIS. The Army published the Notice of Intent (NOI) in the Federal Register and EIS Preparation Notice (EISPN) in the State Environmental Review Program's *The Environmental Notice*, which initiated the public scoping period July 23-September 1, 2021. The current stage of the NEPA/HEPA process is the Draft EIS public review period.

The intent of the public review period is to provide the public with project information and the opportunity to review and provide comments on the Draft EIS. The Draft EIS describes alternatives for the Proposed Action and assesses impacts, which are subject to public review over a 60-day period. Public and agency comments received will be fully considered and may be incorporated into 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/OahuEIS>. Furthermore, the public may also review the Draft EIS at the following local libraries: 1. Hawai'i State Library, Hawai'i Documents Center; 2. Kahuku Public and School Library; 3. Wahiawā Public Library; 4. Wai'anae Public Library.

The publications of the Notice of Availability (NOA) in the Federal Register on June 7, 2024 and Draft EIS in The Environmental Notice on June 8, 2024 began the public review process. 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 August 7, 2024. The Army welcomes public participation during the public comment period.

### NEPA/HEPA STEPS



### DRAFT EIS PUBLIC MEETINGS

Public meetings will take place as follows:

- July 9, 6-8 PM at Wai'anae District Park Multi-Purpose Room  
85-601 Farrington Hwy, Wai'anae, HI 96792
- July 10, 6-8 PM at Kahuku High and Intermediate School  
56-490 Kamehameha Hwy, Kahuku, HI 96731
- July 11, 6-8 PM at Leilehua High School  
1515 California Avenue, Wahiawā, HI 96786

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.

#### EIS WEBSITE

- View project documents or watch Draft EIS public meetings via live stream at: <https://home.army.mil/hawaii/OahuEIS>



Scan with smartphone to be directed to the O'ahu EIS website.

### HOW TO SUBMIT WRITTEN COMMENTS

Comment Period is  
June 7 – August 7, 2024

- In person: Attend a public meeting. Detailed information available at: <https://home.army.mil/hawaii/OahuEIS>
- Online via EIS website (above) or QR code (to the left)
- Via email: [ATLR-Oahu-EIS@g70.design](mailto:ATLR-Oahu-EIS@g70.design)
- Via U.S. mail: O'ahu ATLR EIS Comments  
P.O. Box 3444  
Honolulu, HI  
96801-3444

### HOW TO SUBMIT ORAL COMMENTS

(only available on July 9, 10, and 11)

- In person: Attend a public meeting
- Via phone: (808) 515-5518

#### 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

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.

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# Army Training Land Retention of State Lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Makua Military Reservation, Island of O'ahu

## ARMY SEEKS PUBLIC COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT

The Army has prepared an Environmental Impact Statement (EIS) for Army Training Land Retention of State Lands at Kahuku Training Area (KTA), Kawaihoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O'ahu. The Army proposes to retain up to approximately 6,322 acres of State-owned lands at these locations, for which current leases expire in 2029.

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 (CFR) Parts 1500–1508 as amended, and Army NEPA implementing regulations in 32 CFR Part 651. The EIS also complies with Hawai'i Revised Statutes Chapter 34:3 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 Draft EIS and public meeting materials on the EIS website at: <https://home.army.mil/hawaii/OahuEIS>. The Draft EIS is also available for review at the following libraries:

1. Hawai'i State Library, Hawai'i Documents Center
2. Kahuku Public and School Library
3. Wahiawā Public Library
4. Wai'anae Public Library



Scan with smartphone to be directed to the O'ahu EIS website

## DRAFT EIS PUBLIC MEETINGS

- ▶ July 9, 6-8 PM – Wai'anae District Park Multi-Purpose Room 85-601 Farrington Hwy, Wai'anae, HI 96792
- ▶ July 10, 6-8 PM – Kahuku High and Intermediate School 56-490 Kamehameha Hwy, Kahuku, HI 96731
- ▶ July 11, 6-8 PM – Leilehua High School 1515 California Avenue, Wahiawā, HI 96786

Review the meeting materials or watch public meetings via live stream on the EIS website: <https://home.army.mil/hawaii/OahuEIS>

## OPTIONS TO SUBMIT COMMENTS

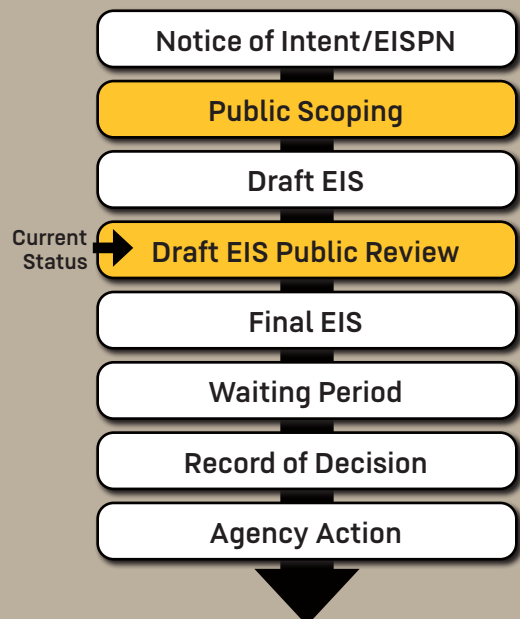
Comment period is June 7 - August 7, 2024.

- ▶ Via public meeting (written or oral)
- ▶ Online: <https://home.army.mil/hawaii/OahuEIS>
- ▶ Via email: [ATLR-Oahu-EIS@g70.design](mailto:ATLR-Oahu-EIS@g70.design)
- ▶ Via mail: O'ahu ATLR EIS Comments P.O. Box 3444 Honolulu, HI 96801-3444
- ▶ Via phone: (808) 515-5518 (July 9, 10, and 11)

*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 STEPS

The timeline below shows opportunities for public input in gold.



## 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

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**Direct Mail Postcard**

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**U.S. ARMY**

**Army Training Land Retention of State Lands at Kahuku Training Area,  
Kawailoa-Poamoho Training Area, and Makua Military Reservation, Island of O'ahu**

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

The Army proposes to retain up to approximately 6,322 acres of State-owned land at Kahuku Training Area (KTA), Kawailoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O'ahu 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 action and to take appropriate steps, where necessary, to mitigate potential adverse effects. The Draft EIS public comment period is from June 7 – August 7, 2024. Public meeting materials and more information are available at the EIS website.

**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 Draft EIS public meetings.

In person:

- July 9, 6 - 8 PM – Wai'anae District Park Multi-Purpose Room  
85-601 Farrington Hwy, Wai'anae, HI 96792
- July 10, 6 - 8 PM – Kahuku High and Intermediate School  
56-490 Kamehameha Hwy, Kahuku, HI 96731
- July 11, 6 - 8 PM – Leilehua High School  
1515 California Avenue, Wahiawā, HI 96786

Online:

Review project documents or watch Draft EIS public meetings via live stream at the EIS website:  
<https://home.army.mil/hawaii/OahuEIS>

**OPTIONS TO SUBMIT COMMENTS**

Comment period is June 7 – August 7, 2024.

- Public meeting (in person)
- Online via EIS website:  
<https://home.army.mil/hawaii/OahuEIS>
- Via email: ATLR-OAHU-EIS@g70.design
- Via mail: O'ahu ATLR EIS Comments  
P.O. Box 3444  
Honolulu, HI 96801-3444
- Via phone: (808) 515-5518 (July 9, 10, and 11)

For further information or for accessibility requests:

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



**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**

**E-1: Responses to Scoping Comments**

**E-2: Responses to Draft EIS Comments**

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## **E-1: Responses to Scoping Comments**

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## Appendix E-1

# Responses to Scoping Comments

This section of the appendix provides background information, the scoping process, and responses to substantive comments received during the extended 40-day public scoping period for the Notice of Intent and Environmental Impact Statement (EIS) Preparation Notice from July 23 to September 1, 2021. The topics raised during the scoping comment period are grouped into the following categories: Background, Description of Proposed Action and Alternatives, Affected Environment and Consequences, and EIS Findings. Multiple comments were received on each of the topics. The United States (U.S.) Army (Army) response to the substantive comments raised is provided under each topic.

All public comments are valued, reviewed, categorized and included in the EIS as part of the scoping process. While the Council on Environmental Quality's National Environmental Policy Act (NEPA) implementing regulations do not require responses to scoping comments, the Hawai'i Environmental Policy Act (HEPA) outlines a scoping comment response process in HAR 11-200.1-23(c): "Written comments and responses to the substantive comments shall be included in the draft EIS pursuant to section 11-200.1-24. For purposes of the EIS public scoping meeting, substantive comments shall be those pertaining to the scope of the EIS." Out of 2,138 comments there were approximately 77 comments which were categorized as non-substantive to the scoping and EIS process. This Appendix E includes all scoping comments received, and responses to substantive topics as appropriate.

## E-1.1 Background: EIS Process and Scope

This subsection includes responses to scoping comments on public involvement in the EIS process, Hawaiian sovereignty, lease/retention price, and live-fire training at MMR.

### Public Involvement

#### Commenters

Abbi Abshire	Carley Atkins	Kevin Butterbaugh
Melodie Aduja, Environmental Caucus of the Democratic Party of Hawai'i	Adnan B. Lauren Ballesteros- Watanabe	Czeska Cabuhat Amy Cameron Michele Capobianco
Noelani Ahia	Chelsea Barbee	Kenji Cataldo
Carrie Alford	Lauren Blissett	Anna Chua, The Sierra Club of Hawai'i
Raed Alsemari	Jonah Bobilin	Mary Clapp
Leilani Antone	Madison Brown	Valerie Crabbe
Aida Ashouri	Karly Burch	

Julia Cramer	Kawena'ulaokalā Kapahua	Jordan Ragasa
Makanamakamaeonalani	Aaron Katzeman	Ikaika Ramones
DaMate	Kara Kelai	Michael Reimer
Mara Davis	Darius Kila	Andy Rivers
Ashley De Coligny	Gwen Kim	Sparky Rodrigues
Manuel Wayne Makahiapo	Miya King	Madelyn Rose
DeCosta Kuloloio	MichaelKirk-Kuwaye	Kawai Santiago
Keoni DeFranco	Manuel Wayne Makahiapo	Nic Santos
Sierra Dew	Kuloloio	Taylor Saunders
Tiana Dole	Ara Laylo	Scott Seu, Hawaiian Electric
John Dwyer	Claudia Leung	Sheela Sharma
Malia Evans	Uahikea Maile	Senator Maile Shimabukuro, Senate District 21
Hanalei Fergerstrom, Na Kupuna Moku O Keawe (Hawai'i Island)	Kaipo Matsumoto	Samantha Snively
Sasha Fernandes	Rebecca Mattos	'Ilikea Snow
Jonathan Fisk	Sorcha McCarrey	M Kehlani Souza, The Olohana Foundation
Chris Foster	J. Mahealani McClellan	Regan Spencer
Representative Cedric Gates, House District 44/45	Meleanna Meyer	Mariette Strauss
Sergi Gimenez	Yuri Miyabara-Treschuk	Alisha Summers
Makanalani Gomes	Mariana Monasi	Drew Tanda
Lisa Grandinetti	Shelley Muneoka, KAHEA: The Hawaiian Environmental Alliance	Tlaloc Tokuda
Tina Grandinetti	Jarika Naputo	Michael Tom
Dee Green	Luke Nemy	Emily Townley
Tyler Greenhill	Theresa Ng	Grace Tsubaki-Noguchi
Cameron Grimm	Jacob Noa	Annett Mehana Unten
Shannon Hennessey	Amy O.	Ashlee Valeros
Tai Hino	Lysandra Padeken	Brandon Valeros
Pomai Hoapili	Katherine Peck	Anna van Dorsten
Rebecca Hogue	Representative Amy Perruso, Hawaii House District 46	Suzanne Vares-Lum
Sam Ikehara	Johnnie-Mae Perry	Christina Vien
Jeanne Ishikawa, Wahiawā- Whitmore Village Neighborhood Board No. 26	Barbara Pope	Viana Villasenor
Iokepa Kaeo	Deborah Pope	Purdyka Wahilani
Kyle Kajihiro	Shelly Preza	Troy Wong
Kaimana Kanekoa	Pumehana Puaoi-Perry	Kristen Young
	India Pyzel	Kalani (no last name provided)



Due to the COVID-19 pandemic and changing Emergency Proclamations and Orders at the State of Hawai'i (State) and county levels in response, there were challenges in planning multi-venue, in-person public scoping sessions on O'ahu that would accommodate the different neighborhoods affected by this EIS while abiding by local rules on gathering limits at the time of the scoping period for the EIS.

The minimum HEPA requirement for the scoping period is to hold one public meeting on the affected island and to provide opportunity for oral comments during the public meeting. During scoping logistics planning, a hybrid concept of the public scoping meetings was planned in consideration of the uncertainties of the COVID-19 pandemic. This hybrid approach facilitated in-person oral and written comments and personal engagement by members of the community while adhering to COVID-19 health and safety precautions and directives in effect at that time. The online component of the hybrid meeting was designed to allow the public to participate in and view the in-person scoping meetings on both August 10 and 11, 2021, from 6:00 p.m. to 9:00 p.m. Hawaii Standard Time. The two hybrid public scoping meetings were to be held at the Leilehua Golf Course in central O'ahu and were to include in-person meetings in addition to a live streaming feature on the U.S. Army Garrison-Hawaii (USAG-HI) YouTube channel to allow online viewing of the proceedings.

In response to the Governor's Executive Order 21-05 issued on August 10, 2021, which set greater restrictions on public gatherings, the in-person element of the public scoping meetings was canceled, and the meetings were moved entirely to an online format. Executive Order 21-05 was issued just prior to the first scoping meeting event. To inform the public of this change, signage was provided at the entrance to the meeting venue at Leilehua Golf Course notifying participants that the in-person meetings were canceled and informing them of how to participate online.

Representatives from the USAG-HI Public Affairs Office (PAO) were present at the Leilehua Golf Course and made a tablet device available to stream the webinar proceedings for members of the public who physically appeared to attend the originally scheduled in-person meeting.

Oral comments were received within the meeting timeframe through the virtual platform and through a dedicated, recorded telephone line. The telephone line was available for callers to provide comments orally for an extended period, beyond just the meeting hours required by HEPA to allow for oral comments, from 1:00 p.m. on August 10 until 11:59 p.m. on August 12, overlapping the online scoping meeting sessions.

In response to the comments received during the scoping meetings, the Army made the recordings of the virtual proceedings publicly available on the USAG-HI YouTube channel. After receiving comments about the desire to see other community members' faces, the Army attempted to shift the second evening session format to allow for video of public commenters; however, technical difficulties necessitated the format to be shifted back to the same format as the previous night.

The purpose of the scoping period is to solicit input on the range of alternatives and potentially impacted environmental resources to be analyzed for the Proposed Action. The public was also encouraged to take part in the Cultural Impact Assessment (CIA) survey, which was advertised in the Office of Hawaiian Affairs monthly publication, *Ka Wai Ola* and solicited consultations with practitioners, Native Hawaiian organizations (NHOs), stakeholders, and other individuals. The public may also provide comments during the Draft EIS public comment period.

In addition to the public scoping meetings, then USAG-HI Commander Colonel Daniel Misigoy attended a “talk story” online event with Hawai’i Legislative Representative Amy Perruso prior to the scoping period. The USAG-HI PAO also conducts periodic outreach to local stakeholders, including a Native Hawaiian advisory group.

A Neighborhood Board requested to visit the Poamoho training area, but due to the extreme terrain and slopes, a site tour would not likely be possible. A visit to the bordering edge of Poamoho may be possible by directly contacting the USAG-HI PAO.

Other scoping comments related to public involvement included the identification of other agency or stakeholder groups to notify and engage, identification of technical issues with the project website, links or other electronic communication, the adequacy of a 40-day public comment period, and the inability to have in-person meetings (due to the COVID-19 pandemic).

## **Hawaiian Sovereignty**

### Commenters

Paige Allen	Kioni Dudley	Arcelita Imasa, Hawaiian Committee for Human Rights in the Philippines
Kelsey Amos	Jordan Elicker	Iokepa Kaeo
Joseph Anderson	Emmalise Enders	Kaleikoa Ka’eo
Salma Argueta	Wallace Engberg	Ku Kahakalau
Charlie Ashcom	Joy Enomoto, Women's Voices Women Speak	Ricky Kahu
Jake Atienza	A. F.	Kyle Kajihiro
Bronson Azama	Banner Fanene	Kendall Kaufmann
Isabella Batts	Hank Hanalei Fergerstrom	Law Kawai
Kelly Behan	Na Kupuna Moku O Keawe (Hawai’i Island)	Jonah Keohokapu
Natasha Boteilho	Jonathan Fisk	Kevin Kiesel
Kalea Bridgemohan	Heather Fong	Manuel Wayne Makahiapo
Puanani Brown	Raynae Fonoimoana	Kuloloio
Madison Brown	Ronald Fujiyoshi, Ohana Ho’opakele	Erin Lawrence
Mary Clapp	Keiko Gonzalez	Maelani Lee
Bianca Clark	Sean Hayworth	Ash Leslie
Kinsi Cook	David Henkin, Earthjustice on behalf of Malama Makua	Victor Limon
Alexia Daoussis	Brittany Hite	La’akea Low
Kimberly Dark	Emily Holmberg	Aracely Lozano
Mara Davis		Jessica LT
Kate Degman		Miranda Makaruk
Finn Devereux		Joelene Manuel
Mark Doherty		
Jaqueline Duarte		

Mahealani Martin	Courtney Nelson	Megan Stephenson
McJean	Isiuwa Oghagbon	Melanie Stockwell
Alexis Melvin	Devin Oishi	Steven Thomas
Melanie Mendieta	Andrea Olivas	Julian Vandeventer
Rae Michelle	Lysandra Padeken	Rebekah Wegesend
Sophia Milone	Caleb Pascale	Kenneth Wethington
Kane Kumu Honua Kama- kapu Mo'i Kamehameha, Sovereign Kamehameha Dynasty Government	Bruce Pascua Brittney Kulanui Perez Brittney Perez	Annie Wilson Austin Windau Kerry Yamauchi
Summer Kaimalia Mullens Ibrahim	Sierra Ramos Catherine Ritti	Niyah Yisrael Lille Youngbauer
Shelley Muneoka, KAHEA: The Hawaiian Environmental Alliance	Anjoli Roy Natalie Santiago Jocelyn Shaw	Luis Zano Unidentified Caller #5 Branson (no last name provided)
Ash N. Brian K Naeole	Samantha Snively	

Over 100 scoping comments expressed concern that property rights for State-owned lands are currently misallocated, that the lands belong to the Hawaiian people, and that the State does not have the jurisdiction to confer land use rights or land ownership of these lands to the Army or any other entity. This EIS is premised on legal precedents from court rulings and public records affirming the State's right to these lands. The land use resource area section in the EIS discusses land tenure, impacts and significance of impacts under both lease and fee simple title including the impacts from the Army not retaining State-owned lands.

Scoping comments were received on environmental justice as it relates to the history of military use on Hawaiian lands, relations between the military and NHOs, and the overall current social climate regarding the military and military uses on Hawaiian lands.

Comments discussed the terms of the original 1964 leases, including the lease fee, which is seen as inequitable, and how a more equitable exchange could provide value to the Hawaiian people, such as via fair market compensation, land exchanges, and funding for Native Hawaiian community benefits. These comments are identified as perceived impacts in the environmental justice section, but specific remedies or mitigations are not identified at this time because they would be dependent on future land tenure and possible lease terms. The environmental justice analysis also considers any potential disproportionate impacts of the Proposed Action on Native Hawaiian populations.

## Lease/Retention Price

### Commenters

Chloe Allen	Alan Hayashi	Rebecca Pierpoint
Kelsey Amos	Kyle Hinton	Michael Reimer, Ph.D.
Joseph Anderson	Rebecca Hutson	Abigail Rose
Daniel Anthony	Jeanne Ishikawa, Wahiawā-Whitmore Village Neighborhood Board No. 26	Anjoli Roy
Robert Austin	Tanya Kauhi	Daniel Schlieder
Kae Bender	Finch Kehoe	Philip Schlieder, Delphi LLC
Halani Berard	Kaili Kosaka	Samantha Snively
Meredith Buck	Theresa Kuehu	Mele Stokesberry
Ts'eh Cacek	Kawena Lauriano	Greta Stuart
Willis Chang	Maud Lawrence	Summer-Solstice Thomas
Daniel Chesmore	Nikos Leverenz	John Tittle
Emma Ching	Raudel Lopez	Shika Veera
Katherine Conrad	Jeremiah Mangini	Joseph Wat
James Dunn	Mariah Menor	Patrick Watson
Jones Elizabeth		Lea Dan Yee
Kapulei Flores		

Comments addressed the \$1 lease price of the current leases with the general sentiment expressed that the Army should retroactively make payments for perceived unfair lease costs and use those funds for community benefits, such as environmental initiatives, education, mental health resources for homeless individuals, and infrastructure improvements; and pay fair market value for any lands that are retained. Comments suggested that cheap prices devalue the resources of the land and contribute to environmental destruction. Another comment stated that the lease price should include contribution to a reserve fund for environmental cleanup.

The EIS clarifies that the current leases for the State-owned lands 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, and easement) and any associated conditions for the selected alternatives.

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 would be finalized during future negotiations.

This EIS 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.

## Live Fire Training at MMR

### Commenters

Lauren Harmony Blissett	David Henkin, Earthjustice on behalf of Malama Makua	Moananui Peleiholani-Blankenfeld
Puanani Brown	Von Kaanaana	Ikaika Pestana
Kenji Cataldo	Kalani Kaanaana	Marisa Plemer
Keoni DeFranco	Michael Kirk-Kuwaye	Devin Scanlan
Joy Enomoto, Women's Voices Women Speak	Kane Kumu Honua Kama-kapu Mo'i Kamehameha, Sovereign Kamehameha Dynasty Government	Shoen Scott
Mallory Foster		Purdyka Wahilani
Carolyn Hadfield		Danielle West

While resumption of live-fire training at MMR no longer being pursued by the Army and is not being evaluated in this EIS, it was raised as a concern during the scoping period by more than a dozen commenters. Comments concerning live fire pertained to noise from live-fire exercises associated with past training, desecration of the land, impacts on natural resources and cultural access, and the need for education and healing of lands formerly used for live-fire training. The Army conducted live-fire training exercises at MMR until 2004. A Federal court injunction at that time, along with subsequent rulings, restricted training operations at MMR to non-live-fire training pending sufficient completion of an EIS analyzing the impacts of live-fire training activities.

The Army subsequently completed the *Final Environmental Impact Statement for Military Training Activities at Mākuā Military Reservation, Hawai'i* (MMR Live-Fire Training EIS), including analysis of resumption of live-fire training, and signed an associated Record of Decision (ROD) in July 2009 (USAEC & USACE, 2009). Additional court proceedings, however, meant that the court injunction has remained in place. The Army acknowledged to the court and the plaintiff in the court case that additional NEPA analysis is required for any proposal to resume live-fire training. Court-ordered studies for evaluation of cultural and marine resources at MMR to inform impacts of past live-fire activities were completed in 2014 and 2015, respectively. After consideration of the numerous studies completed over the course of many years, the findings of the 2009 Live-Fire Training EIS, current and foreseeable training requirements, and recent substantial changes to Army force structure, the Army has determined that it will not pursue live-fire training at MMR. For the purposes of cumulative impacts analysis in this EIS, live-fire training at MMR is not considered reasonably foreseeable.

## E-1.2 Description of the Proposed Action and Alternatives

This subsection includes responses to scoping comments on the purpose of and need for the Proposed Action, Proposed Action and Alternatives and support for the No Action Alternative.

### Purpose of and Need for the Proposed Action

#### Commenters

Kelsey Amos	Judie Hoepfner	Anjoli Roy
Lauren Ballesteros- Watanabe	C. M. Kaiama	Erin Rutherford
Patricia Blair	Kyle Kajihira	Ryan-Lowary Sam Fong
Henry Boothe	Lahela Kalohi-Arroyo	Philip Schlieder, Delphi LLC
Anna Chua, The Sierra Club of Hawai’i	CJ Kee	Scott Seu, Hawaiian Electric
Kanoa’ihimaikalani Cleveland	Anna King	Jack Shriver, Honolulu Council, Navy League of the US
Kim Compoc	Christine Lanning	M Kehlani Souza, The Olohana Foundation
Makanamakamaeonalani DaMate	Constance Lau, Hawaiian Electric Industries	Lexis Wallace
Sasha Davis	Gabriel Lee, American Savings Bank	Jaclyn Weiss
Travis Delima	Rebecca Mattos	Sara Williams
Pete Doktor	Stanley May	Jennifer Woo
Joy Enomoto, Women's Voices Women Speak	Brenda McCallum	Colonel Ann Wright, Veterans For Peace, Chapter 113-Hawai’i
Malia Evans	Nedi McKnight	Hanalei (no last name provided)
Peter Goldie	Linda Muralidharan	
Scott Grinsell	John Olszowka	
Amber Herzog Lyman	Jay Rachels	
	Michael Reimer, Ph.D.	

The purpose and need statements presented in **Chapter 1** of the EIS describes the reasons why the Proposed Action is needed by the Army for military training and support purposes and why it needs to be located on O’ahu. Comments received on the purpose and need questioned the locational need to train in Hawai’i with the evolution of military training technology and changes in how training is conducted which could also possibly lessen the quantity of land needed. Other potential uses unrelated to ongoing levels, types, and tempo of training activities are not within the scope of this EIS.

Hawai’i is a strategic location for national defense and rapid deployment of military forces. The U.S. Indo-Pacific Command (USINDOPACOM) region is critical to national security and covers more of the globe than, and shares borders with all, the other five geographic Department of Defense (DoD) 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 jungle environment of O’ahu. 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.

Terminating the use of the State-owned lands would substantially impact the ability of U.S. Army Hawaii (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 the O’ahu training areas with State-owned lands, training capabilities for home-stationed troops in Hawai’i would be insufficient, and readiness levels in the USINDOPACOM region would be compromised. Relocating training elsewhere does not satisfy the purpose and need for the Proposed Action. **Chapter 1** of the EIS provides additional information on the importance of Hawai’i and the O’ahu training areas to the U.S. military.

The Proposed Action is needed to provide austere training environments in support of USARHAW-coordinated training, preserve maneuver training areas, enable access between U.S. Government-controlled lands on O’ahu, provide a buffer from encroachment (and accidental or intentional trespassing) on U.S. Government-controlled land, retain infrastructure investments, and allow for future facility and infrastructure modernization, particularly with respect to the austere training environments combined with varied maneuver training areas that the O’ahu topography provides. The landscape found in these training areas is ideal to provide a realistic training environment. The Army needs large quantities of land, away from populated areas, to provide the training necessary to maintain soldier readiness for rapid deployment and to ensure both soldier and public safety. State-owned lands on O’ahu include areas with sufficient slopes for safe maneuver area that is critical to Army training. Retention of maneuver area on State-owned lands is important for maneuver training for company-sized units. The level and timing of compliance with lease terms related to vacating the property, including cleanup required, would be contingent upon which alternative is selected and the method of retention.

Army management of threatened and endangered species and historic and archaeological sites is not directly related to the Proposed Action, and prior NEPA actions or other regulatory compliance may determine how these activities are conducted. Any impacts or consequences that these alternatives may have on these resources due to the changed boundaries of the State-owned lands retained are analyzed and discussed in **Chapter 3**. The management of endangered species, habitat, and historic and archaeological sites are activities that are subject to separate Federal regulatory review under Section 7 of the Endangered Species Act and Section 106 of the National Historic Preservation Act, respectively, which are discussed in **Section 1.4.3**. The lease compliance actions and return of lands, as it relates to cleanup and restoration, are discussed below.

### **Proposed Action and Alternatives**

#### Commenters

Kerstyn Afuso	Kathleen E Brizuela Absalon	Matthew Dekneef
William Aila, Jr., Hui Malama ‘O Makua	Puanani Brown Sophie Cann	Kiersten Faulkner, Historic Hawaii Foundation
Raed Alsemari	Liam Chinn	Mallory Foster
Kelsey Amos	Carl Christensen	Representative Cedric Gates, House District 44/45

Marina Ghin	Kane Kumu Honua Kama-	Drew Tanda
David Henkin, Earthjustice on	kapu Mo’i Kamehameha,	Adam Tuifagu
behalf of Malama Makua	Sovereign Kamehameha	Sunny Unga
Bianca Isaki Ph.D., Esq.	Dynasty Government	Karen Vitulano, US EPA,
Jeanne Ishikawa, Wahiwā-	Shelley Muneoka, KAHEA:	Region IX
Whitmore Village	The Hawaiian Environmental	Purdyka Wahilani
Neighborhood Board No. 26	Alliance	Amy Wasielewski
Kyle Kajihiro	Johnnie-Mae Perry	Patrick Watson
Sydney Keli’ipuleole, Native	Lopaka Purdy	Anastacia Wolfgramm-
Hawai’i Chamber of	Michael Reimer, Ph.D.	Pineda
Commerce	Kady Riggan	Colonel Ann Wright,
Kevin Kiesel	Robert Robello	Veterans For Peace, Chapter
Anna King	Anjoli Roy	113-Hawai’i
TC Knowles	Nic Santos	Tyler (no last name provided)
Oriana Leao	Christopher Seals	Kahuku Community
William Liggett	Senator Maile Shimabukuro,	Association Board
	Senate District 21	

The Proposed Action (i.e., retention of up to approximately 6,322 acres of State-owned lands at KTA, Poamoho, and MMR) is a real estate action (administrative action) that would enable continuation of ongoing activities on the State-owned lands retained. The Proposed Action does not include construction or changes in military training activities or changes to resource management actions. Additionally, the Proposed Action does not include changes to the use, size, or configuration of the Special Use Airspace overlying the State-owned lands. The type, volume, and conduct of training, maintenance, and repair activities, and the resource management actions currently occurring at the three training areas are described in **Chapter 2** of the EIS. Future changes in training activities; facility and infrastructure modernization or construction actions; other changes in training, maintenance, and repair activities; or resource management actions on the State-owned lands would be analyzed under separate, future NEPA/HEPA actions, as applicable.

Comments received pertaining to the Proposed Action and Alternatives included a concern if the level of acreage is needed for the various alternatives, and whether technology advances allow for less land required for training. Additional comments suggested analyzing the benefits that may accrue to the community and opportunity costs of selecting the No Action Alternative. Several comments also requested that the name of the EIS should include the word “return” as opposed to “retain.” The intent for the EIS is for the Army to consider whether, and how much, land would be retained, and the environmental impacts from such. The EIS presents and analyzes a range of alternatives that represent varying levels of retention, as well as the No Action Alternative, under which no State-owned lands would be retained.

The three action alternatives presented in this EIS were identified through a detailed screening process. Prior to the initiation of the EIS, the Army evaluated alternatives to the Proposed Action (e.g., virtual-only training, relocation of training to other areas within and outside of Hawai’i), which are briefly discussed in **Chapter 2** of the EIS. These alternatives are not reasonable alternatives because they are alternatives to implementing the Proposed Action (i.e., a form of land retention), not alternatives for implementing



the Proposed Action. These alternatives do not satisfy the purpose and need statements and do not meet the screening criteria; therefore, they were not brought forward for analysis in the EIS. Likewise, alternatives identified during scoping that are not associated with the Proposed Action (e.g., return all O‘ahu training areas to the State, change training types, diplomacy) are not reasonable alternatives for the Proposed Action.

Reasonable alternatives must satisfy the purpose of and need for the Proposed Action and meet the screening criteria based on the purpose and need statements. **Chapters 1 and 2** of the EIS describe the Proposed Action, purpose and need statements, and screening criteria. Alternatives 1, 2, and 3 adequately meet the purpose and need and all screening criteria and have been carried forward for detailed analysis in this EIS. Alternatives that were considered by the Army but do not adequately meet one or more of the screening criteria (i.e., Alternative 4: Retention of Only Access, Utilities, and Infrastructure; Alternative 5: Retention with Training and Modernization Limitations; Alternative 6: Short-term Retention; Alternative 7: No Retention, Halted Training, and Engaged Diplomacy; Alternative 8: Transfer to a Third Party for Continued Stewardship of Resources; and Alternative 9: No Retention, and Move All MMR Training Elsewhere) are addressed in **Chapter 2** of the EIS; however, these alternatives are not carried forward for detailed analysis.

In addition to discussing the Proposed Action, **Chapter 2** of the EIS summarizes the training areas, facilities, utilities, and infrastructure within the State-owned lands; current activities conducted within the State-owned lands, including conservation efforts; and land retention estates available to the Army. **Chapter 3** of the EIS details the affected environment, including region of influence (ROI), and potential environmental consequences of the Proposed Action.

**Chapter 2** of the EIS also describes lease compliance actions (e.g., reforestation, removing signs, removing or abandoning structures, and removing weapons and shells) and return of State-owned lands not retained that would be triggered via lease expiration under Alternative 2, Alternative 3 (MMR only), and the No Action Alternative. Per the leases, the lease compliance actions may occur after expiration of the lease. The leases include 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 leases 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 that lease compliance actions would occur under various DoD programs. Additionally, it is assumed that investigation, removal, and cleanup of hazardous substances and wastes, including munitions and explosives of concern (MEC), within the State-owned lands not retained would occur under the Comprehensive Environmental Response, Compensation, and Liability Act.

## Support No Action

### Commenters

Marie Abaya  
Heiley Acoba  
Anna Acosta  
Alex Adams  
Sheyla Adaya

Nico Addams  
Melodie Aduja,  
Environmental Caucus of the  
Democratic Party of Hawai‘i  
Daniela Aguirre  
Christine Ahn

Kylie Akiona  
Nancy Aleck  
Chloe Allen  
Eli Allison  
Miguel Almodovar

Xochitl Alvarado	Maria Bortolaso	Mara Cooper
Mychaela Anderson	Chelsea Boyle	Jasmine Cooper
Teresa Anderson	Elisabeth Bragale	Caroline Corry
Nathan Anderson	Alyssa Brooks	Stephanie Cotumaccio
Michael Andrews	Kysha Brown	Marlee Craker
Jeanette Aquino	Puanani Brown	Nicole Cristobal
Rachel Arasato	Kimberly Buck	Dana Crocker
Adrienne Arcilla	Andrea Buckman	Sydney Crowe
Diana Arias Garcia	Michelle Cabalse	Ilse Cruz Cordova
Madison Armentrout- Minjarez	Ellen-Rae Cachola	Michelle Current
Michelle Arvizu	Laura Cahill	Charlotte Curry
Corey Asano	Olivia Camacho	Megan Dalley
Miles B.	Chantell Cambia	Sasha Davis
Sarah Baker	Jordan Cameron	Arrianna Dawes
Christina Balderas	Benita Campbell	Julien De Jesus
May Balino-Sing	Marguerite Campbell MPH	Royce De Jesus
Cooper Barnard-Mayers	Bri Caprisun	Keoni DeFranco
Avrey Baron	Montana Cardinal	Bonnie Delgado
Lauren Bastellesteros- Watanabe	Hana Castillo	Renae DeLucia
Victoria Bayang	Dillon Castro	Maya Deshpande
Anne Bayne	Kenji Cataldo	Jordan Devillanueva
Jim Bearden	Nicholas Chagnon	Mildred Diaz
Virginia Beck	Megan Chamberlain	Willow Diller
Shelby Becker	Grace Chang	Kamuela Don Napoleon
Melanie Bellomo	Cassidy Chang	Madison Donaldson
Annie Ellen Benavidez	Tiffany Chater	Emily Donovan
Polly Bentley	Evelyn Chorush	Holly Drummond
Jessica Bidon	Allegra Christianscher	Tara Dubin
Lauren Biglow	Mariko Cilley	Siobhan Duncan
Alex Bishop	Amanda Clemmons	William Duncan
Zoe Black	Kanoa Cleveland	Rebekah Duncan
Patricia Blair	Kanoa'ihimaikalani Cleveland	Taylor Duplantier
Samantha Blalock	Marlene Coach-Eisenstein	Melissa Edwards
Alyssa Bland	Janna Coble	Jade Elyssa Rivera
Lauren Harmony Blissett	Natai Collins	Joy Enomoto, Women's Voices Women Speak
	Marisa Conners	

Sofronio Estores	Donjai Green	Rachel Huang
Jessica Estrada	Zoey Greer	Ting Huang
Chris Etzkorn	Regina Gregory	Jane Huff
Samantha Euston	Leanne Grossman	Angela Huntemer
Lu Faborito, Makaha Hawaiian Civic Club	Yuejia Gu	Rebekkah Hunter
Jessie Faige	Taylor Guasta	Ramona Hussey
Rose Fairchild	Leila Guevera	Sam Ikehara
Lynn Feinerman	Shruti Gumate	Mana Iluna
Callista Fernandez	David Gurrola	Gabriela Indivero
Anne Fey	Dana (Mae) Ha	Mike Inouye
Jonathan Fisk	Carolyn Hadfield	Tom Iwanicki
Lauren Flanagan	Catherine Hage	Kelsey Jackson
Elena Floren	Michael Hahn	Karen Jeffery
Emily Ford	Jessica Halpin	Emily Johns
Cheyenne Foreman	Tom Halpin	Shanti Jourdan
Mallory Foster	Karl Hamann	Linda Jury
Bayden Fraley	Rachael Han	Erica K
Marisa Franco	Joseph Han	Krysten Ka'ai
Noah Freeman	Christina Hang	Von Kaanaana
Reydan Freitas	Paige Hansen	Kalani Kaanaana
Forest Frizzell	Chloe Hartwell	Iokepa Kaeo
Sophie Frost	Kate Haupt	Kyle Kajihiro
Natalie Gaffney	Savannah Hawkins	Leah Kanae
Amanda Gaglio	David Henkin, Earthjustice on behalf of Malama Makua	Kanaloa Kane
Diana Garcia	Shannon Hennessy	Hope Kaneakua
Abigail Garcia	Kyara Heredia	Kyungmin Kang
Renee Garcia	Sarah Heritage	Vagmi Kantheti
Reem Gawish	Sherry Hester	Dani Kaohe David
Hannah Givertz	Nathan Hester	Piilani Kaopuiki
Kaylan Godfrey	Rebecca Hill	Ku'ulani Kato
Brianna Golden	Carol Hirth	Kiana Kelae
Kim Goll	Jennifer Ho	Mabel Ann Keliioomalua
Jhiana Gomes	Vera Hoang	Emmeline Kelley
Julie Gomez	Molly Hoffman	Courtney Ann Keohulua
Keiko Gonzalez	Emily Holmber	Punahelu Kikipi
		Soon Kim

Gwen Kim	Gladis Marquez	Shelley Muneoka, KAHEA:
Hideki Kimukai	Malia Marquez	The Hawaiian Environmental
Aya Kimura	Dylan Marquis	Alliance
Michael Kirk-Kuwaye	Indira Martinez	Kelsey Murphy
Emma Koa	Lahela Mattos	Monica Musgrave
Theresa Kuehu	Tori McAllister	Sophia Muus
Mariah L.	Finn McFadden	Megumi Nakama
Koalani Lagareta	Gigi McGaughey	Karen Nakasone
Koalani Lagaretti	Kahoiwai McGee	Brittany Namaau
Mary Lagomarsino	Kyleigh McGuire	Charla Naone
Marygail Lakner	Keith McHugh	Spencer Ng
Lu Ann Lankford-Faborito, Makaha Hawaiian Civic Club	Adriene McNeil	Haley Nichols
Bryanna Lantych	Teddy McNerney	Margaux Nielsen
Michael Lawler	Alfred Medeiros	Elizabeth Oakes
Krysta Lawrence	Alfred Keaka Hiona Medeiros	Shambrea Oliver
Caitlin Lee	Jaerick Medeiros-Garcia	Zyreal Oliver-Chandler
Ona G. Lee	Larry Meisgeier	Willow Olson
Maelani Lee	Fabienne Melchior	Catherine Orleans
Lisa Lemke	Martin Melkonian	Preston Ornellas
Ana Denisse Lepes Sanchez	Veronica Messer	Kathryn ORourke
Maelia Leslie	Lola Mestas	Kiana Otsuka
Kadence Letua	Joe Meyers	Micah Pacatang
Selah Levine	Erick Michaelson	Megan Padua
Danny H.C. Li	Andie Miller	Koohan Paik-Mander
Meredith Linhart	Mari Miller	Kyle Paist
Rimona Livie	Lyn Milo	Amy Palmer
Ashley Livingston	Colleen Minarich	Jaidyn Pang
Nanea Lo	Madison Minjarez	Magda Papaioannou
Joy Loo	Kane Kumu Honua Kama- kapu Mo'i Kamehameha, Sovereign Kamehameha Dynasty Government	Jaquelyn Parker
Julie M.	Mitchell Molloy	Lee Parks
Eleanor M. Eisler	John Momenty	Minerva Patino
Navroop Maan	Shirlena Monroe	Michaela Patton
Roop Maan	Nadine Morris	Ashalie Pawe
Sage Mackenzie	Abigail Mountz	Jessica Payton
Elise Maize		Moananui Peleiholani- Blankenfeld
		Elaina Perry

Johnnie-May Perry	Kristi-Ann Say	Kelsey Taylor
Ikaika Pestana	Devin Scanlan	Jordyn Taylor
Manny Petersen	Elena Schaeff	June Taylor
Melodi Pierro	Shoen Scott	Renee Tedder
Heidi Pihana	Hannah Sennett	Christopher Telomen
Marisa Plemer	Alika Seto	Arianna Terlitsky
Grant Porter	Julia Seydel	Hannah Thao
Erin Potter	Sheila Shahbazi	Tlaloc Tokuda
Caroline Powers	Geoff Shaw	Melissa Tomlinson
Leslie Pyo	Devika Shenoy	Juana Torres
Cam Quevedo	Elizabeth Sheppard	Dana Torrico
Sarah R.	Elise Sherrill	Mickey Tran
Miriam Ragsdale	Alana Siaris	Carolyn Treadway
Sufia Rai	Jennifer Silva	Samantha Trevino
Emily Rainey	Karla Silva-Park	Jenny Trollman
Anna Rambow	Jess Sobocinski	Ashley Trotter
Laura Ramirez	Ikaika Solomon	Virginia Trowbridge
Dylan Ramos	Jincy Songer	City Councilmember Heidi Tsuneyoshi, District 2
Chris Raynes	JoNelle Sood	Adam Tuifagu
Makana Reeves	Phoebe Spague	Adrienne Turner
Michael Reimer	Mallory Spencer	Frederick Tyres
Alondra Reyes	Geraldine Spiegle	Kamalani Uehara
Jacky Reynaga	Nicole Squassoni	Tavia Ukauka
Marie Richards	Malika Steen	Andrea Valencia
Diana Richardson	A.L. Steiner	Mia Vergari
Juanita Rivas	Judith Stetson	Elizabeth Villasana
Willow Roberts	Jessica Stevenson	Kaukaohu Wahilani
Kaylin Rogers	Sam Stiles	Purdyka Wahilani
Tara Rojas	Robert Stiver	Danielle West
Abigail Rose	Hannah Streeter	Ashleigh Whitman
Alexa Rose	Hal Strough	Jade Wilber
Susan Rosier	Josiah Stuart	Beverly Wilkinson
Julia Ruch	Greg Sullivan	Vernon Wilson
Samantha Sanchez	Liysa Swart	Julia Withers
Elisa Sanchez	Amanda T.	Deanna Wong
Brittany Sandoval	Samantha Makahi Tanuvasa	

Symia Woodson	Diana (no last name provided)	Ronnie (no last name provided)
Georgette Woolsey		
Ang Woon	Gabriel (no last name provided)	Senti (no last name provided)
Colonel Ann Wright, Veterans For Peace, Chapter 113-Hawai’i	Giovanna (no last name provided)	Shanny (no last name provided)
William Wu	Heather (no last name provided)	Shelley (no last name provided)
Melissa Wyant	Holly (no last name provided)	Tawna (no last name provided)
Kami Yamamoto	Ilona (no last name provided)	Kahuku Community Association Board
Bean Yogi	Isabel (no last name provided)	Unidentified Caller #1
Kristen Young	Jerry (no last name provided)	Unidentified Caller #3
Jess Young	Katie (no last name provided)	Unidentified Caller #4
Karen Young	Kennedy (no last name provided)	Unidentified Caller #8
Audrey (no last name provided)		Unidentified Caller #9
Brianna (no last name provided)	Leila (no last name provided)	Unidentified Caller #12
Daniel (no last name provided)	Rachel (no last name provided)	Unidentified Caller #13

One of the recurring themes of scoping comments was to “support no action.” Approximately 475 comments reflected a preference to see the current leases expire and no new leases for the Army. Under the No Action Alternative, none of the State-owned lands at the three training areas would be retained; however, Poamoho is the only area where the entirety of the property is State-owned. The Army would still conduct training at KTA and MMR within U.S. Government-controlled land. Comments requested that the Army be required to clean up MEC and contaminants, and restore the properties to their pre-lease conditions. Comments also noted that the No Action Alternative was not being treated as an actual option analyzed in this EIS, but rather a comparative baseline. The Army is committed to complying with Federal and State regulations and lease terms as they apply to these properties. Applicable regulatory compliance and conditions are presented in **Sections 1.4, 3.2, 3.5.2, 3.7.2, 3.8.2**, and **Appendix J** of the EIS. The No Action Alternative is analyzed in parallel with the action alternatives in the EIS.

## E-1.3 Affected Environment and Consequences

This subsection includes responses to comments on the ROI; land use; biological resources; cultural resources; hazardous substances and wastes; air quality and greenhouse gases (GHG); noise; geology, topography, and soils; water resources; socioeconomics; environmental justice; transportation and traffic; and human health and safety.

### Region of Influence

#### Commenters

Angela Huntemer-Sidrane

Kyle Kajihiro

There were two specific comments related to the ROI. One comment recommended that flora and fauna studies be reviewed within five miles outside the boundaries of the project areas. The other comment was related to expanding the ROI to include downstream, downwind, underground, overhead and visual landscapes and soundscapes. The ROI for potential impacts is defined and addressed for each resource area in **Chapter 3** appropriate to the characteristics of that resource. The ROI for cumulative impacts may be larger than the ROI for impacts from the Proposed Action, and these factors are considered for each individual resource area in the environmental consequences analysis in **Chapter 3** of the EIS.

### Land Use

#### Commenters

Abbi Abshire

Kathleen E Brizuela Absalon

Matthew Dekneef

Melodie Aduja,  
Environmental Caucus of the  
Democratic Party of Hawai‘i

Puanani Brown

Sierra Dew

Noelani Ahia

Madison Brown

James Doherty

Carrie Alford

Cheryl Burghardt

Tiana Dole

Raed Alsemari

Czeska Cabuhat

Jamie Echols

Kelsey Amos

Amy Cameron

Jordan Elicker

Leilani Antone

Kenji Cataldo

Vanessa Esprescion

Carley Atkins

Susan Ching Harbin

Malia Evans

Adnan B.

Carl Christensen

Mary Alice Evans, State of  
Hawai‘i Office of Planning &  
Sustainable Development

Lauren Ballesteros-  
Watanabe

Mary Clapp

Kiersten Faulkner, Historic  
Hawaii Foundation

Chelsea Barbee

Valerie Crabbe

Sasha Fernandes

Dylan Barr

Makanamakamaeonalani  
DaMate

Jonathan Fisk

Ad Beekmeijer

Diana Dannoun

Chris Foster

Lauren Blissett

Mara Davis

Representative Cedric Gates,  
House District 44/45

Jonah Bobilin

Ashley De Coligny

Keoni DeFranco

Sergi Gimenez	Uahikea Maile	Kawai Santiago
Makanalani Gomes	Rebecca Mattos	Taylor Saunders
Marshall Gooch	Sorcha McCarrey	Sheela Sharma
Lisa Grandinetti	Douglas McCracken	Senator Maile Shimabukuro, Senate District 21
Tina Grandinetti	Kalia Medeiros	Samantha Snively
Tyler Greenhill	Meleanna Meyer	'Ilikea Snow
Regina Gregory	Yuri Miyabara-Treschuk	Rachel Solís
Cameron Grimm	Rita Miyamoto	Mariette Strauss
Jamie Hearn	Mariana Monasi	Alisha Summers
David Henkin, Earthjustice on behalf of Malama Makua	Nathan Nahina	Drew Tanda
Shannon Hennessey	Makana Nalehua	Carol Titcomb
Tai Hino	Jarika Naputo	Michael Tom
Pomai Hoapili	Luke Nemy	Emily Townley
Rebecca Hogue	Natalie Nimmer	Grace Tsubaki-Noguchi
Renee Hoomanawanui	Jacob Noa	Annette Mehana Unten
Ivy Hsu	Amy O.	Ashlee Valeros
Jeanne Ishikawa, Wahiwā- Whitmore Village Neighborhood Board No. 26	Shannon Lokelani Oberle	Brandon Valeros
Kalani Kaanaana	Lena Orlando	Anna van Dorsten
Iokepa Kaeo	Kiana Otsuka	Christina Vien
Ku Kahakalau	Micah Pacatang	Viana Villasenor
Kyle Kajihiro	Lysandra Padeken	Karen Vitulano, US EPA, Region IX
Kawena'ulaokalā Kapahua	Aleka Pahinui	Purdyka Wahilani
'Alihilani Katoa	Amy Parsons	Patrick Watson
Aaron Katzeman	U'ilani Perry	Gail Weininger
Kara Kelai	Barbara Pope	John & Lucy Witeck
Gwen Kim	Deborah Pope	John Witeck
Miya King	Shelly Preza	Anastacia Wolfgramm- Pineda
Michael Kirk-Kuwaye	Pumehana Puaoi-Perry	Troy Wong
Kevin Landers	India Pyzel	LeaDan Yee
Ara Laylo	Jay Rachels	Kristen Young
Nicole Leonard	Jordan Ragasa	Tyler (no last name provided)
Claudia Leung	Ikaika Ramones	Unidentified Caller #6
	Andy Rivers	
	Anjoli Roy	

Comments received expressed concern for public access (for recreational and cultural practices) of ceded lands that are in public trust for the benefit of the community and public access trails. Impacts on



recreation at the training areas are analyzed in **Section 3.2.5**. Existing recreational uses and impacts, and current conditions, including agreements, that allow and restrict access to these recreational facilities are discussed in **Sections 3.2.5.1** (KTA), **3.2.5.2** (Poamoho), and **3.2.5.3** (MMR), and provisions for cultural access are discussed under Cultural Access Policies for each training area in **Section 3.5.5**. Current programs for preservation, restoration, and educational efforts are described in **Chapter 2** and **Section 3.3.5**.

The Land Use section of the EIS (**Section 3.2**) describes the State-owned lands currently leased by the Army at KTA, Poamoho, and MMR, based on Federal, State, and City and County of Honolulu laws and classifications of land tenure. Concerns were expressed over the use of conservation and agricultural lands for military training and the compatibility with current land use regulations and policies.

Current and historical uses, including district designations and applicability, and compliance with land use regulations and policies are discussed. Environmental consequences of past, present, and reasonably foreseeable actions are analyzed in this section.

Comments on potential impacts from the retention of the State-owned lands within the agricultural and conservation districts are addressed in the environmental consequences portion of **Section 3.2**. Further State decisions (i.e., by the Land Use Commission and/or BLNR) would be required if an alternative were selected where State-owned lands were retained for the continuation of military training activities. The EIS also analyzes the impacts of the overall loss of land in a fee simple process and military use in areas where it is not zoned for such a use.

Conservation subzones (i.e., Resource, Limited, and Protective) are identified for the State-owned portions of KTA, Poamoho, and MMR. Military use is currently not a permitted use in either the conservation or agricultural districts (see discussion in **Section 3.2**). The Hawai‘i Coastal Zone Management program as it relates to HRS Chapter 343 requirements is addressed in **Section 4.3**. The Proposed Action does not anticipate changes to existing uses or previous existing agreements for public beach access and use of Mākua Beach Park and Yokohama Beach Park under the management of Ka‘ena Point State Park. State and city/county agency roles and responsibilities described in this EIS are limited to those associated with land not retained by the Army.

Several comments discussed the rightful ownership of the State-owned lands leased by the Army, the status of ceded lands, or lands held in trust. All the State-owned lands associated with the Proposed Action have been identified as ceded lands. Ceded lands consist of 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 **Section 3.2**. The history of land ownership for each parcel is not analyzed in this EIS, but records of Land Commission Award claims that were previously granted and historical accounts that were found are presented under the Historical Overview subsections of **Sections 3.4.5.1** (KTA) and **3.4.5.3** (MMR); there are no such known accounts for Poamoho.

Comments were received requesting that the EIS evaluate the possible land tenure options, in addition to fee simple title acquisition, across all alternatives and the no action alternative. The EIS analyzes a range of land retention options to implement the Proposed Action (adding lease, fee simple title, easement, and license) and impacts from those land tenure options brought forward for analysis, where applicable in resource area sections. The Proposed Action as stated in the EIS, to retain State-owned lands at the O‘ahu

training areas, is analyzed for lease and fee simple title methods of land retention. Army Regulation (AR) 405-10 authorizes various estates for land retention, including fee simple title (full ownership), lease, easement, and license. The potential conditions assumed with the various land retention estates are stated in **Section 2.4** and **Appendix G**.

**Section 3.2.5** provides a description of the 1959 Admissions Act (Public Law 86-3, 73 Statute 4), which admitted Hawai’i into the United States; approximately 1.4 million acres of the lands that were transferred to the new State of Hawai’i had a trust status, and the revenues from these lands were to be used for public purposes, including “for the betterment of the conditions of native Hawaiians.”

The proposed Natural Area Reserve (NAR) designation at Poamoho is detailed in **Section 3.2.5.2** under Land Tenure. Further concerns about the compatibility of military land use with conservation efforts and related cleanup efforts are addressed in **Sections 3.3** and **3.6**, respectively. In response to the request for the EIS to present historical photos over the last 65 years of Kawaihoa-Poamoho Training Area (Poamoho), this is not part of the scope of this study. The consistency review for the Federal Coastal Zone Management Act is discussed in **Chapter 4**.

The purpose of this EIS is to analyze the retention of these State-owned lands for military use under different alternative scenarios (i.e., full retention, modified retention, and minimum retention) to sustain current training and combat readiness requirements. Commenters suggested several alternative uses to consider for the future should land not be retained by the Army and returned to the State, such as natural open space, national park, agriculture, hunting, renewable energy, housing, other non-military uses, Hawaiian homesteads, traditional Native Hawaiian uses and preservation. Analysis of other alternative uses are not within the scope of this EIS. Any change in the proposed uses of these State-owned lands may be undertaken in a separate environmental review. KTA Tract A-1 is currently zoned agricultural district. Analysis of Important Agricultural Land designation nor other non-military uses for land not retained is outside the scope of this EIS.

## Biological Resources

### Commenters

Abbi Abshire	Adnan B.	Mauna Burgess
Melodie Aduja, Environmental Caucus of the Democratic Party of Hawai’i	Lauren Ballesteros- Watanabe	Czeska Cabuhat
Noelani Ahia	Chelsea Barbee	Amy Cameron
Rosanna Alegado	Alex Bishop	Kenji Cataldo
Carrie Alford	Lauren Blissett	Solomon Champion
Raed Alsemari	Jonah Bobilin	Susan Ching Harbin
Leilani Antone	Henry Boothe	Carl Christensen
Aida Ashouri	Puanani Brown	Mary Clapp
Carley Atkins	Madison Brown	Valerie Crabbe
Bronson Azama	Meredith Buck	Makanamakamaeonalani DaMate
	Karly Burch	Diana Dannoun

Mara Davis	Aaron Katzeman	Hilina'i Pokely
Ashley De Coligny	Kara Kelai	Barbara Pope
Keoni DeFranco	Darius Kila	Deborah Pope
Sierra Dew	Gwen Kim	Shelly Preza
Tiana Dole	Miya King	Pumehana Puaoi-Perry
James Dunn	Michael Kirk-Kuwaye	India Pyzel
Malia Evans	Kari Leah Labrador	Jordan Ragasa
Mary Alice Evans, State of Hawai'i Office of Planning & Sustainable Development	Mary Lacques	Ikaika Ramones
Rose Fairchild	Ara Laylo	Andy Rivers
Sasha Fernandes	Oriana Leao	Kawai Santiago
Jonathan Fisk	Russell Leong	Taylor Saunders
Chris Foster	Claudia Leung	Sheela Sharma
Jonathan Galka	Nikos Leverenz	Jacob Shearer
Representative Cedric Gates, House District 44/45	Uahikea Maile	Senator Maile Shimabukuro, Senate District 21
Sergi Gimenez	Taylor Marsh, Native Ecosystem Services	Jack Shriver, Honolulu Council, Navy League of the US
Makanalani Gomes	Rebecca Mattos	Joseph K. Simpliciano Jr.
Lisa Grandinetti	Sorcha McCarrey	Nicholas Smith
Tina Grandinetti	Shannon McClish	Samantha Snively
Dee Green	Douglas McCracken	'Ilikea Snow
Tyler Greenhill	Denise Medeiros	Matthew Stelmach
Cameron Grimm	Meleanna Meyer	Mariette Strauss
Michael Hadfield	Yuri Miyabara-Treschuk	Drew Tanda
Shannon Hennessey	Mariana Monasi	Carol Titcomb
Pomai Hoapili	Shelley Muneoka, KAHEA: The Hawaiian Environmental Alliance	Michael Tom
Rebecca Hogue	Zack Murphy	Emily Townley
Chandler Holland, Red Ridge, NC	Makana Nalehua	Annette Mehana Unten
Angela Huntemer-Sidrane	Jarika Naputo	Ashlee Valeros
Andrea Kaaawa	Luke Nemy	Brandon Valeros
Kalani Kaanaana	Jacob Noa	Christina Vien
Iokepa Kaeo	Amy O.	Viana Villasenor
Kyle Kajihiro	Lysandra Padeken	Karen Vitulano, US EPA, Region IX
Kawena'ulaokalā Kapahua	Aleka Pahinui	Kalyn Wadsworth
'Alihilani Katoa	Amy Parsons	Purdyka Wahilani
	Ingrid Peterson	

Lauren Watanabe	Anastacia Wolfgramm-	Shuochen Zheng
Joe Wilson	Pineda	Native Hawaiian Chamber of
Austin Windau	Troy Wong	Commerce
John Witeck	Kristen Young	Unidentified Caller #2

During the scoping period, public comments on biological resources identified concerns regarding training-related noise impacts; habitat loss; invasive species (primarily around noxious weeds); loss and protection of rare, Federal- and State-listed species, and species of greatest conservation concern and their associated habitats; wildfire; species of cultural significance; the status of the proposed NAR; and impacts from historical live fire at MMR. Noise impacts on wildlife are analyzed in **Section 3.8** and native flora and fauna that have special cultural significance to Native Hawaiians are discussed in **Section 3.5** and **Appendix B**.

**Section 3.3** reviews and incorporates all available natural resources studies within the ROI for each of the training areas. While no new studies will be completed as part of this EIS, the Army identified future projects and research to aid in the continued conservation of protected and native species within the O’ahu training areas. Some completed/ongoing studies include post-fire restoration techniques, native habitat restoration to support protected and native species, invasive species control methods, and life history and viability analyses for listed species. Invasive species control methods research includes mechanical, chemical, and biological control techniques (USAG-HI, 2010b).

Live-fire training has not been permitted or conducted on MMR since 2003 when a Federal court injunction restricted MMR operations to non-live fire pending completion of an EIS and supporting marine and cultural resources studies that sufficiently analyze the impacts of live-fire training activities (U.S. District Court, 2006; U.S. District Court, 2012). The marine and cultural studies were completed by 2015, and a court injunction remains in place. The Army has no plans to resume or propose resumption of live-fire training at MMR.

The Army retention of State-owned lands on O’ahu has the potential to result in increased wildland fire potential, wildlife disturbance, habitat loss, and infestation of noxious weeds and other invasive species. 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, developed in cooperation with the U.S. Fish and Wildlife Service (USFWS) and State Division of Forestry and Wildlife, serves as a tool for planning and integrating land resources compliance and management activities with the military mission.

The 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), U.S. Army Installations, Island of Oahu* issued by USFWS states conservation measures must be executed by the Army to off-set adverse training impacts (USFWS, 2003). Such measures include, but are not limited to, control of rodents, actions to minimize the destruction and degradation of forest structure, and ungulate removal. Additionally, the Army actively manages the spread of invasive species through prevention and interdiction, early detection and rapid response, and ongoing control or eradication. This includes control of *Chromolaena odorata* (devil weed), which has been observed within KTA. In 2021, Army Natural Resources Program O’ahu staff worked to clear *C. odorata* from approximately 470 acres in 52 areas (ANRPO, 2021). In addition to previously listed management actions, the Army developed management units, which are defined areas,

typically fenced, containing protected and native species habitat managed to control or remove ungulates and other threats, and to facilitate species recovery and habitat protection.

Species with the potential to occur on State-owned land at KTA include 136 plants and 53 wildlife species; of these species, 24 are protected, with no species documented on Tract A-1 and 1 protected plant species documented on Tract A-3. There is no designated critical habitat at KTA. Species with the potential to occur on Poamoho include 114 plants and 53 wildlife species; of these species, 60 are protected, with 27 species documented on Poamoho. There are three designated critical habitats on or adjacent Poamoho. There are 4,349 acres of O‘ahu ‘elepaio designated critical habitat across both the Poamoho and Proposed NAR Tracts and an additional 75 acres of O‘ahu ‘elepaio designated critical habitat occur within the 100-foot ROI buffer outside the current State-owned land boundary for a potential total of 4,424 acres of O‘ahu ‘elepaio critical habitat. This 100-foot buffer also extends an additional 18.6 acres east of the Proposed NAR Tract into the Wet Cliff Unit 8 critical habitat, which includes critical habitat for plants, *Megalagrion leptodemas* (crimson damselfly), and for *Megalagrion oceanicum* (Oceanic Hawaiian damselfly) (USFWS, 2022a). Neither damselfly taxa has been documented on either the Poamoho or Proposed NAR Tracts. Species with the potential to occur on State-owned land at MMR include 102 plants and 30 wildlife species; of these species, 14 are protected. There have been no documented protected species on the Makai or Center Tracts, and there have been 12 species documented on the North Ridge and South Ridge Tracts. There is a total of 970 acres of O‘ahu ‘elepaio designated critical habitat including the 100-foot buffer around the State-owned land on MMR (USAG-HI, 2010b; DLNR, 2015a; DLNR, 2021c; USFWS, 2022a).

The distribution of vegetation, invasive and noxious weeds, native species, and protected species within the O‘ahu training areas is described in **Section 3.3** and in **Tables 1** through **13** in **Appendix H**.

Wildfire poses a significant threat to the sensitive ecosystems, cultural sites, and quality and flexibility of military training. Per the *Army Wildland Fire Policy Guidance Memorandum* dated September 4, 2002, and AR 200-1, *Environmental Protection and Enhancement*, the Army implements and adheres to an *Integrated Wildland Fire Management Plan* that provides wildland fire management and operational protocols to meet land management goals and objectives. Within the *Integrated Wildland Fire Management Plan*, protection of the local environment and biological resources is considered in fire management strategies and fire suppression activities.

An NAR of approximately 1,230 acres on the eastern portion of Poamoho was proposed by the DLNR. While the proposal has been approved internally within the DLNR, the area has not been officially designated an NAR by the Governor of Hawai‘i. Impacts of the Proposed Action on resources within the proposed NAR are analyzed in **Section 3.3**.

### **Cultural and Historic Resources and Cultural Practices**

#### Commenters

Abbi Abshire	William Aila, Jr., Hui Malama	Raed Alsemari
Melodie Aduja,	‘O Makua	Leilani Antone
Environmental Caucus of the	Jim Albertini, Malu ‘Aina	Yuuko Arikawa-Cross
Democratic Party of Hawai‘i	Center For Non-violent	Aida Ashouri
Noelani Ahia	Education & Action	

Carley Atkins	Chris Foster	Tom Lechanko, Aha Ula
Bronson Azama	Lesley Gabrielle	Puuhonua Kukaniloko
Adnan B.	Jonathan Galka	Claudia Leung
Lauren Ballesteros- Watanabe	Representative Cedric Gates, House District 44/45	Nikos Leverenz
Chelsea Barbee	Sergi Gimenez	Kauwila M.
Halani Berard	Makanalani Gomes	Uahikea Maile
Lauren Harmony Blissett	Lisa Grandinetti	Rebecca Mattos
Jonah Bobilin	Tina Grandinetti	Sorcha McCarrey
Henry Boothe	Dee Green	Douglas McCracken
Celina Brown	Tyler Greenhill	Kalia Medeiros
Puanani Brown	Cameron Grimm	Meleanna Meyer
Madison Brown	Christina Hang	Yuri Miyabara-Treschuk
Karly Burch	David Henkin, Earthjustice on behalf of Malama Makua	Mariana Monasi
Mauna Burgess	Shannon Hennessey	Summer Kaimalia Mullens Ibrahim
Czeska Cabuhat	Douglas High	Makana Nalehua
Amy Cameron	Tai Hino	Jarika Naputo
Kenji Cataldo	Pomai Hoapili	Luke Nemy
Carl Christensen	Rebecca Hogue	Jacob Noa
Mary Clapp	Charlene Holani	Amy O.
Kanoa Cleveland	Renee Hoomanawanui	Lysandra Padeken
Kelsey Cohen	Angela Huntemer-Sidrane	Aleka Pahinui
T.J. Cuaresma	Sam Ikehara	Amy Parsons
Makanamakamaeonalani DaMate	Kalani Kaanaana	Lee Peele
Mara Davis	Iokepa Kao	Barbara Pope
Ashley De Coligny	Kyle Kajihiro	Deborah Pope
Keoni DeFranco	Kawena'ulaokalā Kapahua	Shelly Preza
Sierra Dew	Aaron Katzeman	Pumehana Puaoi-Perry
Tiana Dole	Katherine Kealoha	India Pyzel
Malia Evans	Kara Kelai	Jordan Ragasa
Kiersten Faulkner, Historic Hawaii Foundation	Gwen Kim	Ikaika Ramones
Sasha Fernandes	Miya King	Andy Rivers
Senator Kurt Fevella, State of Hawai'i District 19	Melanie Lander	Tara Rojas
Jonathan Fisk	Kawena Lauriano	Kawai Santiago
	Ara Laylo	Taylor Saunders
	Oriana Leao	Kristi-Ann Say
		Keith Scott

Sheela Sharma	Grace Tsubaki-Noguchi	Anastacia Wolfram-Pineda
Senator Maile Shimabukuro, Senate District 21	Annette Mehana Unten	Troy Wong
Thomas T. Shirai Jr.	Ashlee Valeros	Colonel Ann Wright, Veterans For Peace, Chapter 113-Hawai'i
Joseph K. Simpliciano Jr.	Brandon Valeros	Eric Yamamoto
Samantha Snively	Anna van Dorsten	Kristen Young
'Ilikea Snow	Christina Vien	Ku'uuleikuponoaloha (no last name provided)
Mariette Strauss	Viana Villasenor	Native Hawaiian Chamber of Commerce
Alisha Summers	Nicole Vise	Unidentified Caller #10
Drew Tanda	Karen Vitulano, US EPA, Region IX	
Michael Tom	Purdyka Wahilani	
Emily Townley	Amanda Wilmsen	

During the scoping period, comments received related to archaeological resources address four primary issues, including the presence of known archaeological sites within the State-owned lands at KTA, Poamoho, and MMR; assessing past and future negative impacts of military training; the Army's management of archaeological resources and failure to conduct adequate cultural studies; and maintaining compliance with State and Federal historic preservation law.

Several comments emphasized the presence of archaeological resources within the training areas. The EIS presents a thorough review of baseline cultural resources conditions, including an inventory of identified archaeological and historic architectural properties, summaries of previous archaeological studies conducted within State-owned lands, and an overview of the significance of the ROI to Native Hawaiians. This information is generated from previous archaeological surveys and other cultural resource management studies. The EIS also contains a summary discussion of the Army's progress toward identifying new sites within the training areas. To date, 11 studies have been conducted within State-owned land at MMR, two studies have been conducted within State-owned land at KTA, and no studies have been conducted within the State-owned land at Poamoho (see **Section 3.4** of the EIS).

Commenters also highlighted the need for an assessment of significant impacts on archaeological resources. Impacts on these resources are addressed in **Section 3.4**. The Proposed Action is a real estate action (i.e., retention of the State-owned lands). It does not include proposed changes to the current levels, types, and tempo of training or other activities conducted within the State-owned lands.

The analysis for the retention of State-owned lands adheres to all relevant historic preservation laws, including Section 106 of the National Historic Preservation Act, and Hawai'i Revised Statutes Chapter 6E. Existing Programmatic Agreements (PAs) are in place for KTA and Poamoho (USAG-HI, 2018a) and the Ukanipō Heiau site within MMR (USAG-HI, 2000). One comment suggests that the EIS should discuss the provisions of the two PAs, including any stipulations that would be tied to the proposed new lease and future management, and should also address the lack of a historic preservation treatment plan for MMR, how that will be resolved, and how it would be incorporated into any future land retention estate.

Archaeological surveys and 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 Chapter 11-200.1 rules for the environmental impact assessment process require project proponents to assess proposed actions for their potential impacts on 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, 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 three non-contiguous areas of KTA, Poamoho, and MMR. The State-owned lands serve as the study areas, but the boundaries of KTA, Poamoho, and MMR serve as the larger geographic extents of the study area. Where cultural resources are related to other places and activities outside the geographic extent, these impacts are considered.

The CIA presents information about the State-owned lands, Federal lands, and cultural landscape in the project area. It fills gaps in data from previous studies by identifying place names and cultural resources found in English and Hawaiian language resources. The information serves as a 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 an analysis of the project's potential impacts on cultural resources and traditional practices (including access rights) was conducted. Comments related to these issues are addressed in the analysis framework of the CIA. Summaries of interviews are included in the CIA. The CIA includes interviews with people who self-identified as being familiar with the project area.

The State and its agencies have an affirmative obligation to preserve and protect the reasonable exercise of customarily and traditionally exercised rights of Native Hawaiians to the extent feasible. State law further recognizes that the cultural landscapes provide living and valuable cultural resources where Native Hawaiians have exercised, and continue to exercise, traditional and customary practices, including hunting, fishing, gathering, and religious practices. In its *Ka Pa'akai* ruling, 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 EIS provides an overview of land tenure in Hawai'i in **Section 3.2**, but does not address land ownership history because that is not relevant to land retention decisions as part of the Proposed Action.



## Hazardous Substances and Wastes

### Commenters

Abbi Abshire	Jessica dos Santos	Aaron Katzeman
Melodie Aduja, Environmental Caucus of the Democratic Party of Hawai'i	Joy Enomoto, Women's Voices Women Speak	Kara Kelai
Noelani Ahia	Malia Evans	Gwen Kim
Jim Albertini, Malu 'Aina Center For Non-violent Education & Action	Sasha Fernandes	Miya King
Carrie Alford	Jonathan Fisk	Melanie Lander
Joseph Anderson	Chris Foster	Ara Laylo
Leilani Antone	Lesley Gabrielle	Claudia Leung
Aida Ashouri	Sergi Gimenez	Sven Lindstrom, Hawai'i DOH HEER Office
Carley Atkins	Jhiana Gomes	Uahikea Maile
Adnan B.	Makanalani Gomes	Taylor Marsh, Native Ecosystem Services
Lauren Ballesteros- Watanabe	Lisa Grandinetti	Rebecca Mattos
Chelsea Barbee	Tina Grandinetti	Sorcha McCarrey
Lauren Blissett	Dee Green	Douglas McCracken
Jonah Bobilin	Tyler Greenhill	Kahoiwai McGee
Madison Brown	Bob Gregory	Meleanna Meyer
Karly Burch	Cameron Grimm	Yuri Miyabara-Treschuk
Cheryl Burghardt	Carolyn Hadfield	Rita Miyamoto
Czeska Cabuhat	David Henkin, Earthjustice on behalf of Malama Makua	Mariana Monasi
Amy Cameron	Shannon Hennessey	Summer Kaimalia Mullens Ibrahim
Kenji Cataldo	Tai Hino	Jarika Naputo
Mary Clapp	Pomai Hoapili	Luke Nemy
Valerie Crabbe	Rebecca Hogue	Jacob Noa
Makanamakamaeonalani DaMate	Chandler Holland, Red Ridge, NC	Amy O.
Mara Davis	Renee Hoomanawanui	Shannon Lokelani Oberle
Ashley De Coligny	Angela Huntemer-Sidrane	Lysandra Padeken
Keoni DeFranco	Tom Iwanicki	Aleka Pahinui
Noelani DeVincent	Kalani Kaanaana	Amy Parsons
Sierra Dew	Iokepa Kaeo	Marisa Plemer
Tiana Dole	Ron Ka-ipo	Barbara Pope
	Kyle Kajihiro	Deborah Pope
	Kawena'ulaokalā Kapahua	Shelly Preza

Pumehana Puaoi-Perry	Mariette Strauss	Karen Vitulano, US EPA, Region IX
Jordan Ragasa	Alisha Summers	Anastacia Wolfgramm- Pineda
Ikaika Ramones	John Tittle	Troy Wong
Michael Reimer, Ph.D.	Tlaloc Tokuda	Aree Worawongwasu
Andy Rivers	Michael Tom	Kristen Young
Kawai Santiago	Grace Tsubaki-Noguchi	Nathan Yuen
Taylor Saunders	Annette Mehana Unten	Shuochen Zheng
Allison Shiyozaki	Ashlee Valeros	Hanalei (no last name provided)
Joseph K. Simpliciano Jr.	Brandon Valeros	Jim (no last name provided)
Samantha Snively	Christina Vien	Unidentified Caller #11
'Ilikea Snow	Viana Villasenor	

Concerns were expressed pertaining to hazardous substances and wastes about cleanup of the sites after the Army departs, requests for investigations into military debris and pollutants, munitions constituents (MCs) in water and soils, and unexploded ordnance (UXO). References were made to both Red Hill fuel storage and Kaho'olawe cleanup in these comments.

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 Countermeasure (SPCC) Plan/National Pollution Discharge Elimination System (NPDES). If spills occur at KTA, Poamoho, or MMR, the extent of the spill is investigated, characterized, and remediated in compliance with regulatory requirements, thus minimizing potential environmental impacts.

The Army is committed to environmental stewardship in all actions as an integral part of sustaining the Army mission through compliance with applicable Federal, State, and local regulations and guidelines and implementation of the Integrated Training Area Management (ITAM) Program. 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 (DOH) to identify soil and surface water contamination. The Army will continue this collaborative effort to ensure the protection of human health and the environment.

Since 1977, the Army has conducted several environmental investigations to evaluate chemicals of concern associated with military training at MMR. Groundwater sampling was conducted as part of hydrogeologic investigations from 2002 to 2008. In 2009, the Army implemented a Long-Term Monitoring (LTM) Program to investigate the potential off-site migration of contamination from training areas within MMR to the nearshore Mākua and muliwai (estuary) areas. The MMR LTM Program is focused on MC (e.g., energetic compounds, metals) commonly leached from munitions. When appropriate, the monitoring results were used to identify and implement best management practices (BMPs) to minimize impacts. The most likely pathways for contaminant migration are surface water runoff during significant rainfall events and groundwater flow from the inland areas of MMR to the Pacific Ocean. The LTM Program assesses these pathways through the collection of samples from groundwater monitoring wells and automated surface water samplers installed within MMR. The groundwater monitoring well locations were placed to capture representative samples from groundwater flowing from the Wai'anae Mountain

Range to the Pacific Ocean. The LTM Program promotes the Army's policy of being a good steward of the community and continues through the present day.

The Resource Conservation and Recovery Act of 1976 (RCRA) provides guidelines and standards for the disposal of hazardous waste. This act is the Federal program for the management and control of hazardous wastes from "cradle to grave" and is the basic law for the regulation of hazardous waste management practices. AR 200-1 governs the use, transport, and disposal of 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.

There is no evidence that the Davy Crocket weapon system and associated spotting rounds or other weapon systems containing depleted uranium (DU) were fired at KTA, Poamoho, or MMR. Soil samples collected from areas where sediments accumulated from past runoff/erosion events around the perimeter of MMR were analyzed for isotopic uranium by alpha spectrometry in 2007, as part of DU investigations and field surveys, but showed no indication of DU (HQDA, 2008b). Therefore, DU does not represent a human health and safety concern on or near the training areas. Additional information regarding DU and potential health and safety risks associated with DU is presented in the EIS.

It is possible that MEC, which consists of UXO, discarded military munitions, and MCs, is present on State-owned lands, primarily within the North Ridge, Center, and South Ridge Tracts at MMR (USACE-POH & USAG-HI, 2017b). Large quantities of MEC have been collected at MMR during past UXO sweeps, and additional MEC is occasionally encountered during training events. The Army has conducted several studies and determined that MCs associated with source areas at MMR are not expected to migrate off the range at levels that would pose an unacceptable risk to human or ecological receptors. None of the MCs found in soil were detected at concentrations greater than USEPA Region 9 industrial soil regional screening levels (RSLs). RSLs are risk-based concentrations for the Superfund/RCRA programs. They are used for site screening and as initial cleanup goals, if applicable. RSLs are used to help identify areas, contaminants, and conditions that do not require further Federal attention at a particular site. Generally, at sites where contaminant concentrations fall below RSLs, no further action or study is warranted.

The remaining State-owned land at MMR is within the Makai Tract, which was used in the past as an amphibious landing site with occasional small arms ammunition and military munitions use. Because the Army has performed surface and subsurface clearance of UXO and discarded military munitions to reduce the risk of encounters with MEC, this area does not require authorization for access. Soil sampling in this area has identified MCs, but not at concentrations greater than USEPA Region 9 industrial soil RSLs (USACE-POH & USAG-HI, 2017b). The Army monitors the potential for offsite migration of substances associated with MCs at MMR. Areas that contain or are likely to contain MEC are strictly monitored by the Army and are not accessible by the public. Guidance and procedures for the remediation of MEC at active Army installations and Formerly Used Defense Sites are located in the *DoD Ammunition and Explosives Safety Standards* (DoD 6055.9E, 2019).

Detailed information regarding hazardous substances and wastes, including DU and MEC, is provided in **Section 3.6** of the EIS.

Following lease expiration and in accordance with the lease, or as otherwise negotiated with the State, the Army would conduct lease compliance actions. The parameters for compliance with the lease conditions for the State-owned land not retained would be defined and determined after completion of this EIS.

## Air Quality and Greenhouse Gases

### Commenters

Melodie Aduja,  
Environmental Caucus of the  
Democratic Party of Hawai’i  
Mary Tuti Baker

Jeanne Ishikawa, Wahiwā-  
Whitmore Village  
Neighborhood Board No. 26  
Kyle Kajihiro  
Sorcha McCarrey

Koohan Paik-Mander  
Lisa Wallace, Hawai’i DOH,  
Clean Air Branch  
Joe Wilson  
Seiji Yamada

During the scoping period, comments received related to air quality and/or climate change primarily discuss the air emissions stemming from the Proposed Action and Alternatives, concerns with GHG emissions and climate change, and concerns with DU. Many of the concerns associated with climate change are also addressed by responses to comments regarding biological resources, and many of the concerns associated with DU are also addressed by responses to comments regarding hazardous materials and wastes.

Air emissions at KTA, Poamoho, and MMR are not enumerated due to a lack of stationary emission sources on the training areas. Sources of air emissions associated with the State-owned lands at KTA, Poamoho, and MMR include exhaust from military vehicles and aircraft flight operations, dust from vehicle use on gravel and dirt roads and near-ground helicopter operations, military munitions use, prescribed burning, and the open burning of propellants. Prescribed burns are pre-approved by the DOH Clean Air Branch and are conducted in accordance with requirements included in permits and HAR Section 11-60.1-52. Open burning of materials can also be approved when no alternate disposal methods are available. The burning of accumulated excess propellants from various weapons systems at MMR has been approved by the DOH Clean Air Branch through April 2024 due to the minimal effect on air quality when restrictions outlined in the approval letter are followed. **Section 3.7** of the EIS addresses the impacts from air emissions under each alternative considered at each training area.

HAR Section 11-60.1-33 states that fugitive dust must not be generated without taking reasonable precautions. Actions taken by the Army to minimize fugitive dust emissions during training activities include road maintenance, mechanical stabilization, and the use of chemical dust suppressants (palliatives). While the predominant sources of fugitive dust emissions are maneuver activities on unpaved roads and trails, rotor downwash from helicopter activities have been identified as a lesser source. The Army implements restrictions on helicopters hovering and rotowash if soil and atmospheric conditions indicate that excessive dust generation would occur.

The air quality analysis in the EIS is being completed in accordance with EO 13990, *Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis*, the Army’s March 4, 2021 memorandum titled *Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in Army National Environmental Policy Act Reviews*, and the Council on Environmental Quality’s January 2023 interim guidance titled *Final National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change*. **Section 3.7** addresses direct and indirect GHG emissions from the Proposed Action and the impacts of ongoing climate change. Because the Proposed Action is a real estate action, a full life-cycle analysis of GHG emissions from non-scope considerations such as manufacturing and shipping of equipment and materiel, and troop movements to and from KTA, Poamoho, and MMR is beyond the scope of the EIS.

The Army used the Davy Crocket weapon system on range M79 within the Main Post area of Schofield Barracks (southwest of Poamoho) 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 decay and vaporization of DU fragments can impact local air quality. Poamoho is outside of the DU impact area. All of MMR was considered a potential DU impact area, and 10 soil samples were collected along the MMR range roads in 2007 to determine if DU was present. Analysis of these samples showed no indication of DU because results were consistent with naturally occurring uranium concentrations and isotope ratios found in Hawaiian soils and rock. Additional aerial surveys of MMR in 2008 found no evidence that the Davy Crocket weapon system was used.

**Noise**

Commenters

Melodie Aduja, Environmental Caucus of the Democratic Party of Hawai‘i	Taylor Marsh, Native Ecosystem Services	Ikaika Ramones Rachel Reamsbottom
Chloe Allen	Kane Kumu Honua Kama- kapu Mo‘i Kamehameha, Sovereign Kamehameha Dynasty Government	Mark Robinson Darlene Rodrigues
Chloe Amos	Shelley Muneoka, KAHEA: The Hawaiian Environmental Alliance	Michael Sarmiento Kristi-Ann Say
Diane Anderson	Zack Murphy	Alexandria Seger Keolakawai Spencer Shimabukuro
Rachel Arasato	Bruce Nakano	Karen Vitulano, US EPA, Region IX
Andrea Barnes	Jacob Noa	Kalyn Wadsworth
Lauren Harmony Blissett	Kathleen M. Pahinui	Richard Whyte
Celina Brown	Aleka Pahinui	Joe Wilson
Cheryl Burghardt	Healohaokawailani Pascua	Chandler (no last name provided)
Lynell DaMate	Heidi Pihana	
Sheila Gage	India Pyzel	
Tina Grandinetti	Jordan Ragasa	
Erica K.		
Kyle Kajihiro		
Michael Kirk-Kuwaye		

Scoping comments received regarding noise impacts were centered on the Army’s operations on surrounding areas and people recreating near the training areas with State-owned lands, primarily noise associated with military ammunition, helicopters, and other aircraft. Comments stated that notification and engagement had ceased over the years. USEPA requested that the *Guidance for Helicopter for Community Noise Prediction* document be used to detail impacts on wildlife.

The Proposed Action is a real estate action (retention of the State-owned lands) and does not include construction, changes to ongoing activities conducted within the State-owned land retained, or changes to use of the local airports, roadways, and harbors. The Proposed Action would result in the same training and resulting noise from existing KTA, Poamoho, and MMR.

The Army produces a monthly schedule of upcoming training activities involving actions that may be heard outside the training areas. As only one of many agencies using the airspace over O’ahu, the schedule is not inclusive of all aviation activities for all military services. The USAG-HI PAO shares this notice with media, elected officials, and local neighborhood boards using email, social media, and the USAG-HI website. Community members can opt in to receive the notifications directly by emailing [usag.hawaii.comrel@army.mil](mailto:usag.hawaii.comrel@army.mil) with “Subscribe Training” in the subject line.

There are a variety of entry points for the public to voice noise concerns related to the Army’s training activities. Concerns are taken via the Army Hawai’i’s Noise Concern Line at (808) 656-3487 or the email address provided in the previous paragraph. USAG-HI PAO processes the concerns in coordination with the Army’s 25th Infantry Division, who researches and follows up with the public. Concerns are responded to during regular business hours. The Army operates only helicopters and unmanned aerial systems, commonly known as drones. Airplanes or “fixed wing aircraft” are flown by other military services.

The Army acknowledges the jurisdiction and responsibilities of the State. Additional information, including a summary of existing conditions and analysis of potential impacts from the Proposed Action and alternatives, is provided in **Section 3.8**.

### **Geology, Topography, and Soils**

#### Commenters

Melodie Aduja,  
Environmental Caucus of the  
Democratic Party of Hawai’i  
Rachel Arasato

Puanani Brown  
Sergi Gimenez  
Angela Huntemer-Sidrane

Kyle Kajihiro  
Russell Leong  
Shuochen Zheng

Comments expressed concerns regarding contamination of soils from MC, impacts on soils and topography from natural disasters, and impacts on beaches. The Army has built and maintains partnerships with more than 30 local, State, and Federal offices, agencies, and schools and complies with applicable Federal, State, and local regulations and guidelines in an effort to protect the environment and preserve Hawai’i’s natural resources. The Sikes Act Improvement Act, as amended through 2003 (Public Law 108-136), requires the preparation, implementation, update, and review of an INRMP for each military installation in the United States with significant natural resources, and is prepared in cooperation with the USWFS and the DLNR. The INRMP ensures the maintenance of quality training land, thereby supporting USAG-HI in accomplishing its critical military missions. The Army is committed to environmental stewardship in all actions as an integral part of sustaining the Army mission through the implementation of the ITAM Program.

#### KTA (Tracts A-1 and A-3)

KTA is in the northeastern and windward region of the Ko’olau Mountains on a remnant of an eroded shield volcano from the Pleistocene era (1.3 to 2.2 million years ago). Much of the original lava surfaces of the shield volcano remain intact along the Kahuku escarpment, along drainages, and in the outcrops of upland areas. The coastal plains at KTA form on limestone cliffs uplifted from reefs and are covered by calcareous beach sands and sediments eroded from the volcano.

The erosion risk at KTA is locally important in areas where natural drainages and gulches occur. Soil erosion by water within the State-owned land at KTA can be locally substantial. A relatively dry climate and lack of permanent streambeds appear to moderate the risk of erosion, as do areas where soils are not well developed because of exposed rock. The dense vegetation covering the slopes slows runoff and allows more rainfall to infiltrate instead of discharging directly to streams.

All training at KTA, including State-owned land, adheres to procedures, requirements, and management measures outlined in USARHAW Regulation 350-19; AR 350-19; Dust and Soils Management and Monitoring Plan; Erosion Control BMPs Program Plan; INRMP; SPCC Plan; Storm Water Management Plan (SWMP); Standing Operating Procedures (SOPs) for KTA; and the 1964 lease for the State-owned land at KTA. These regulations and procedures ensure the minimization of impacts on geological and soil resources during training activities.

Poamoho (Poamoho Tract and Proposed NAR Tract)

Poamoho is located on the Schofield Plateau on the western slopes of the Ko'olau Mountains, a remnant of an eroded shield volcano from the Pleistocene era, 1.3 to 2.2 million years ago. The area has limited access and is used primarily by the military for aviation training, including low-altitude technical operations. No Army improvements have been made to this area. This site is characterized by dense vegetation and rugged mountainous terrain. The parent material for the rough mountainous land is alluvium and colluvium with paralithic bedrock at 20 to 40 inches. A thin and fine-textured soil mantle of 1 to 10 inches over saprolite is common in this area. Erosion risk within the State-owned land at Poamoho is locally substantial in areas depending on the amount of slope. Erosion associated with ground-based training at Poamoho is not recent because ground-based training has not occurred within the last decade.

Training at Poamoho, which currently consists of aviation activities, adheres to procedures, requirements, and management measures outlined in USARHAW Regulation 350-19; AR 350-19; Erosion Control BMPs Program Plan; INRMP; SPCC Plan; SWMP; SOPs for Poamoho; and the 1964 leases for the State-owned land. These regulations and procedures ensure the minimization of impacts on geological and soil resources during aviation training activities such as from rotowash. In addition, Poamoho is located within the DLNR 'Ewa Forest Reserve (Poamoho section), a State Forest Reserve.

MMR (Makai Tract, North Ridge Tract, Center Tract, and South Ridge Tract)

MMR is located within two valleys on the northwest side of the Wai'anae Mountains. The North Ridge Tract is within Kahanahāiki Valley, the Center Tract straddles Kahanahāiki and Mākua Valleys, and the South Ridge Tract is within Mākua Valley. The ridges and underlying bedrock of Mākua Valley consist of Wai'anae Volcanic basalt rocks. The older part of this sequence, the Pālehua member of the Wai'anae Volcanic series, is exposed in the lower part of the ridge that forms the southern boundary of the valley and probably underlies the valley floor. The higher ridges are formed by the Kamaile'unu and/or Lualualei members of the Wai'anae Volcanics. The valley floor is underlain by Quaternary (less than 1.8 million years old) alluvial deposits of unknown thickness. Near the coast, the surficial deposits consist of beach dune sands underlain by calcareous cemented sands and rubble and the remnants of an emerged ancient reef. The calcareous cemented sands and rubble are the remnants of an emerged ancient reef. A complex mixture of soils occurs in Mākua Valley resulting from the many microenvironments and variations in slope. Erosion risk within the State-owned land at MMR is variable and dependent on the natural topography and drainages. Most drainages generally flow east to west, and stormwater runoff from

upland forests typically runs mauka (from the mountain surrounding MMR) to makai (toward the ocean). Runoff from MMR is either retained on-site or collected in a roadside swale along Farrington Highway. The swale discharges to two box culverts that cross beneath the highway and outlet to low areas between beach dunes to the west of Farrington Highway. A dry climate and lack of permanent streambeds appear to moderate the risk of erosion. To reduce erosion rates, range roads have been improved with crushed coral, and grassy vegetation cover in the valley has increased.

Training at MMR, including State-owned land, adheres to procedures, requirements, and management measures outlined in USARHAW Regulation 350-19; Army Regulation 350-19; Dust and Soils Management and Monitoring Plan; Erosion Control BMPs Program Plan; INRMP; Spill Prevention, Control, and Countermeasure Plan; SWMP; SOPs for MMR; and the 1964 lease for the State-owned land. These regulations and procedures ensure the minimization of impacts on geological and soil resources during training activities.

In 2017, Environmental Condition of Property reports were prepared for the State-owned lands within KTA, Poamoho, and MMR. The purpose of the investigations was to evaluate the environmental condition of the properties by examining the current and historical uses of the property and adjoining properties.

The EIS includes a description of geologic conditions within State-owned lands being considered for the continuation of ongoing activities and analyzes the potential impacts of the Proposed Action. More information is provided in **Section 3.9**.

## **Water Resources**

### Commenters

Melodie Aduja,  
Environmental Caucus of the  
Democratic Party of Hawai’i  
Bronson Azama  
Dan Bissell  
Lauren Harmony Blissett  
Henry Boothe  
Puanani Brown

Mary Alice Evans, State of  
Hawai’i Office of Planning &  
Sustainable Development  
Angela Huntemer-Sidrane  
Kyle Kajihiro  
Kauwila M.  
Shelley Muneoka, KAHEA:  
The Hawaiian Environmental  
Alliance

Shannon Lokelani Oberle  
Lena Orlando  
Jacob Shearer  
Joseph K. Simpliciano Jr.  
Alisha Summers  
Nicole Vise  
Native Hawaiian Chamber of  
Commerce

Water resources-specific comments expressed concerns including contamination of marine life by military MC, impacts on aquifers and the importance of water for agriculture. The Army has built and maintains partnerships with more than 30 local, State, and Federal offices, agencies, and schools; and complies with applicable Federal, State, and local regulations and guidelines in an effort to protect the environment and preserve Hawai’i’s natural resources. The Sikes Act Improvement Act, as amended through 2003 (Public Law 108-136), requires the preparation, implementation, update, and review of an INRMP for each military installation in the U.S. with significant natural resources and is prepared in cooperation with USWFS and the Hawai’i DLNR. The INRMP ensures the maintenance of quality training land, thereby supporting USAG-HI in accomplishing its critical military missions. The Army is committed to environmental stewardship in all actions as an integral part of sustaining the Army mission through the



implementation of the ITAM Program. The ITAM Program, along with the adoption and use of BMPs for riparian zones and other areas and specific watershed management projects, provides the mechanism for attaining watershed management goals by maintaining the integrity of stream courses, reducing the volume of surface runoff originating from disturbed areas and running directly into surface water; minimizing the movement of pollutants (e.g., nutrients) and sediment to surface and groundwater; and stabilizing exposed mineral soil areas through natural or artificial revegetation means. USAG-HI is a member of the Ko'olau and Wai'anae Mountains Watershed Partnerships, a consortium of landowners and interested parties that have banded together to protect the watershed area.

*KTA (Tracts A-1 and A-3)*

Streams on the State-owned land include Waiale'e Gulch (intermittent stream), a tributary off of Kaunalā Gulch to the east of the State-owned land, and Paumalū Gulch (perennial stream), which has multiple branches on the State-owned land. Kaleleiki Stream, located on the west side of Tract A-3, is a perennial stream that is a tributary to the Paumalū Stream. All streams and gulches within State-owned land flow aboveground to a certain point before going underground and reaching the ocean. At this time, the Army does not conduct water quality sampling at KTA. A water pump station was constructed by the Hawai'i Motorsports Association to pump water from the Waiale'e Gulch, an intermittent stream, to control dust; however, the stream is often dry.

Hydrologic units for groundwater and surface water have been defined by DLNR's Commission on Water Resource Management (CWRM) for all islands in the State. KTA overlies the Kawailoa aquifer system in the North groundwater hydrologic unit with a sustainable yield of 29 million gallons per day. There are no drinking water wells within this area. The U.S. Army Engineer District, Honolulu wetland inventory did not identify any wetlands on State-owned land at KTA.

All training at KTA, including on State-owned lands, adheres to procedures and requirements in the Erosion Control BMPs Program Plan, INRMP, IWFMP, SPCC Plan, SWMP, the SOPs for KTA, and the 1964 lease for State-owned land at KTA.

*Poamoho (Poamoho Tract and Proposed NAR Tract)*

Deep gulches in the Poamoho parcel were created by two perennial streams: the Poamoho Stream, a perennial stream, and the North Fork of Kaukonahua Stream. Multiple other perennial streams also exist at Poamoho. An irrigation ditch system was developed between 1900 and 1910 by Waialua Sugar Company to bring water from Poamoho and Kaukonahua Streams for irrigation of sugarcane and pineapple fields. A portion of the approximately 4-mile Mākua Ditch is located within the State-owned land; the entire system has approximately 8 miles of lateral ditches and 38 tunnels. The Mākua Ditch was constructed to collect Kaukonahua water branches above Wahiawā Reservoir (Lake Wilson) for storage. One tunnel, the Poamoho Tunnel, was developed to move water from the northern part of the Poamoho Stream to the North Fork of Kaukonahua Stream and is partially located within Poamoho. The reservoir water is used for agriculture in the North Shore area of Waialua and Hale'iwa. Topographic maps by the U.S. Geological Survey note tunnels in the Poamoho area; however, it is unclear whether the ditches and tunnels are maintained, and the current condition of the system is unknown.

The Commission of Water Resources Management (CWRM) is the primary steward of water resources and has broad powers and responsibilities to protect and manage Hawai'i's water resources. Hydrologic

units for groundwater and surface water have been defined by CWRM for all islands in the State. State-owned land at Poamoho lies in the Wahiawā (western side) and Ko'olau (eastern side) aquifer systems in the Central groundwater hydrologic unit with a sustainable yield of 23 million gallons per day. There are no wells on State-owned land at Poamoho.

Poamoho Pond is one of several features identified as a potential wetland by the U.S. Army Corps of Engineers (USACE) within State-owned land. Poamoho Pond is located near the top of the Ko'olau Mountain Range and is managed by the O'ahu Army Natural Resources Program. This potential wetland has not yet been delineated by USACE, which would be needed to determine its regulatory status.

Training at Poamoho, which is entirely on State-owned land, adheres to procedures and requirements in USARHAW Regulation No. 350-19, *SOP for Kawaiiloa Training Area*, BMPs, and the 1964 lease. The Army implements restrictions on aircraft hovering and rotowash if soil and atmospheric conditions indicate that excessive dust generation would occur. No other existing management measures apply to water resources in Poamoho because ground training does not currently occur.

*MMR (Makai Tract, North Ridge Tract, Center Tract, and South Ridge Tract)*

The State-owned land at MMR is located mainly within the Mākua Watershed; the north portion is located within the Kaluakauila Watershed, and the south portion is located within the Kea'au Watershed. The Mākua Watershed includes drainages from the Punapōhaku Stream, Mākua Stream, Kalena Stream, and Kaluakauila Stream. This dry, leeward region does not support any perennial streams, but subsurface flow is present. Two ephemeral streams cross State-owned land at MMR, Punapōhaku Stream, and Kalena Stream, as do one perennial stream, Mākua Stream, and one intermittent stream, Kaluakauila Stream. USFWS NWI maps indicate that all these stream segments contain riverine wetlands.

Runoff from the streams that drain the valley is channeled through box culverts beneath the highway and terminates east of the long ridge of dune sand east of the shoreline of Mākua Beach. Brackish water pools, or muliwai, are often formed near the mouths of streams, created by seasonal barriers of sand or sediment. Three muliwai (estuarine wetlands located adjacent to the ocean) ponds and the Hau Thicket were identified as potential wetlands between Farrington Highway and the ocean. Punapōhaku muliwai was determined to be a regulated wetland, Kalena and Mākua muliwai were determined to be streams, and the Hau Thicket was determined not to be a wetland. Riverine wetlands and possible palustrine wetlands associated with seep areas in the Mākua Stream drainage are avoided through various Army training restrictions. The size and shapes of the muliwai may vary over time, and not all appear to contain water throughout the year.

MMR and State-owned lands lie in the Kea'au aquifer system in the Wai'anae hydrologic unit with a sustainable yield of 16 million gallons per day. Five wells are listed by USGS within State-owned land at MMR. Well 3-3213-06 (drilled in 1965 to a depth of 36 feet), 3-3213-07 (drilled in 1987 to a depth of 80 feet), 3-3213-04 and 3-3213-01 (drilled in 1962 to a depth of 20 feet), and 3-3113-01 (drilled in 1962 to a depth of 30 feet). Due to their close proximity to the shoreline, all of these wells likely have high salinity. No additional information regarding the wells is available. No public drinking water wells are documented within one mile of State-owned land at MMR.

Training at MMR, including State-owned land, adheres to procedures outlined in the Erosion Control BMPs Program Plan, INRMP, IWFMP, SPCC Plan, SWMP, the SOP for MMR, and the 1964 lease for the State-

owned land at MMR. The DOH issued a NPDES Permit Number HI S000090 to USAG-HI for discharge associated with MMR industrial activities, which expires on October 31, 2025. All discharges must be in compliance with the Clean Water Act as amended (33 U.S.C. §1251 et seq.), HRS Chapter 342D, HAR Chapters 11-54 and 11-55, and the conditions of the NPDES permit.

Since 1977, the Army has conducted numerous environmental investigations to evaluate chemicals of concern associated with military training at MMR. The hydrogeologic investigation included obtaining samples of surface soils, streambed materials, subsurface soils, water from stream flows, suspended sediment from stream flows, and groundwater and comparing compound levels in these samples to current environmental standards and background levels. The hydrogeologic investigation also included the collection of additional parameters to refine the general hydrologic site conceptual model of the Mākua Valley. With the exception of one metal, thallium, the groundwater in Mākua Valley meets drinking water standards established by USEPA.

From 2010 to the present, the Army has implemented the LTM Program to detect off-site migration of contaminants from training areas and to develop a baseline of groundwater and surface water quality within MMR to the nearshore Mākua area and muliwai areas. The program is focused on energetic compounds and metals commonly leached from MCs. In the most recent groundwater monitoring event in May 2021, no tested analytes, except for the total metal manganese, were detected at concentrations exceeding their applicable screening levels. There is no enforceable Federal drinking water standard (maximum contaminant level) for manganese. The LTM Program has found that there are very few obvious historical trends in total metals, dissolved metals, energetics, or perchlorate concentrations. Most analytes were not detected, and those that were detected remained stable or declined throughout time within each groundwater monitoring well, with few outliers. Continuation of the LTM Program for groundwater helps in reducing the uncertainty associated with sporadic or anomalous detections, confirm trends, and promotes the Army's policy of being a good steward of the community. Compliance with the Sustainable Range Awareness Program and adherence to the LTM Program provide a decision-support capability that helps to minimize or prevent the introduction of contamination that may impact groundwater quality.

Following lease expiration and in accordance with the lease, or as otherwise negotiated with the State, the Army would conduct lease compliance actions. The parameters for compliance with the lease conditions for the State-owned land not retained would be defined and determined after the completion of this EIS.

More information regarding water resources is provided in **Section 3.10**.

## Socioeconomics

### Commenters

Melodie Aduja,  
Environmental Caucus of the  
Democratic Party of Hawai'i

Kelsey Amos

Yuuko Arikawa-Cross

Bronson Azama

Mary Tuti Baker

Adele Balderston

Henry Boothe

Adele Bothersten

David Bramlett

Puanani Brown

Meredith Buck

Lindsay Cano

Jason Chung, Military Affairs  
Council, Chamber of  
Commerce HI

Emily Conklin

Keoni DeFranco	Kyle Kajihiro	Kamaka Parker
Kala Diaz	Lahela Kalohi-Arroyo	Moananui Peleiholani-Blankenfeld
Jessica dos Santos	Chezerie Kapiowainuinui	Ikaika Pestana
Malia Duke	Alihilani Katoa	Melinda Polet, Hamakua sacred arts. Fern acres non profit trust
Jane Eastwood	CJ Kee	Margaret Primacio
Joy Enomoto, Women's Voices Women Speak	Candice Kirby	Yvonne Pyle
Mary Alice Evans, State of Hawai'i Office of Planning & Sustainable Development	Sunnie Kupahu	Abigail Rose
Maurie Feldberg	Kari Leah Labrador	Jack Shriver, Honolulu Council, Navy League of the US
Sarah Francis	Lu Ann Mahiki Lankford-Faborito, Makaha Hawaiian Civic Club	Matthew Swalinkavich
Lesley Gabrielle	Kawena Lauriano	Tanaka (no first name provided)
Tina Grandinetti	Natalie Lindsay	Danny Wassman
Nainoa Heaston	Samantha Maas	Joe Wilson
David Henkin, Earthjustice on behalf of Malama Makua	Marian Marcigan	Aipohaku (no last name provided)
Chandler Holland, Red Ridge, NC	Maya Maxym	Koutaro (no last name provided)
Ivy Hsu	J. Mahealani McClellan	Native Hawaiian Chamber of Commerce
Jameela Huntington	Nedi McKnight	Unidentified Caller #7
Sam Ikehara	Laurie Moore	
Wally Inglis	Summer Kaimalia Mullens Ibrahim	
Christina Jones	Shelley Muneoka, KAHEA: The Hawaiian Environmental Alliance	
Katie Mae Jones	Linda Muralidharan	
Nathalie Jones	Theresa Ng	

The comments regarding socioeconomics expressed concerns with housing costs and affordability due to the presence of military personnel living on island and requests for an economic study to analyze the economic impacts from the military presence. Other concerns were noted as to crime, violence cultural differences of residents and the military and displacement of Native Hawaiians.

Socioeconomic characteristics of O'ahu and specific communities are presented in **Section 3.11**. This section provides analysis of demographics, housing, labor force and employment, income, and economic indicators for the City and County of Honolulu and affected communities. As defined by HAR Section 11-200.1-2, the existing conditions includes economic conditions. Pursuant to HAR Section 11-200.1-24(h), the EIS discusses the economic impacts from the continued use of the State-owned land within the training areas, and impacts if the State-owned lands are not retained. The section also discusses the effect of military activity on the local economy, as well as potential socioeconomic and economic impacts of the Proposed Action.

Housing cost trends and affordable housing availability are discussed in **Section 3.11**. Ordinance 18-10 (Establishing an Affordable Housing Requirement) and the associated Rules to Implement the City’s Affordable Housing Requirements seek to increase the production of affordable housing, to encourage dispersal of affordable housing options throughout the City and County of Honolulu, and to maintain those units as affordable. Additionally, **Section 3.11** discusses crime trends on O’ahu based on Hawai’i Attorney General Crime Prevention and Justice Assistance Division data and Police Department annual reports.

The land retention estate(s) and method(s) would not be selected until after the Proposed Action has been approved and a ROD has been published. The Army would propose the most appropriate land retention estates and methods based on the selected alternative and through negotiation with the State. Due to the timing of these negotiations, potential land valuation methods and fees associated with the various land retention estates and methods cannot be evaluated in the EIS. The Army has not calculated the costs associated with the lease compliance actions and investigation, removal, and cleanup of hazardous substances and wastes within the State-owned lands. The parameters for lease compliance actions are subject to the terms of the leases and State negotiations, which cannot be initiated until an alternative has been selected and a ROD issued.

## Environmental Justice

### Commenters

Abbi Abshire	Cheryl Burghardt	Hank Fergerstrom
Noelani Ahia	Czeska Cabuhat	Sasha Fernandes
Jim Albertini, Malu ‘Aina Center For Non-violent Education & Action	Amy Cameron Kenji Cataldo	Senator Kurt Fevella, State of Hawai’i District 19
Carrie Alford	Mary Clapp	Jonathan Fisk
Raed Alsemari	Valerie Crabbe	Chris Foster
Kelsey Amos	Makanamakamaeonalani DaMate	Sergi Gimenez Jhiana Gomes
Daniel Anthony	Diana Dannoun	Lisa Grandinetti
Leilani Antone	Mara Davis	Tina Grandinetti
Carley Atkins	Ashley De Coligny	Dee Green
Adnan B.	Keoni DeFranco	Tyler Greenhill
Mary Tuti Baker	Matthew Dekneef	Cameron Grimm
Lauren Ballesteros- Watanabe	Sierra Dew	Shannon Hennessey
Chelsea Barbee	Tiana Dole	Tai Hino
Lauren Blissett	Jamie Echols	Pomai Hoapili
Jonah Bobilin	Jordan Elicker	Renee Hoomanawanui
Puanani Brown	Joy Enomoto, Women's Voices Women Speak	Ivy Hsu
Madison Brown	Vanessa Esprecision	Sam Ikehara
Karly Burch	Malia Evans	

Arcelita Imasa, Hawaiian Committee for Human Rights in the Philippines	Kalia Medeiros	Samantha Snively
Khara Jabola-Carolus	Meleanna Meyer	‘Ilikea Snow
Jim-eok Jung	Yuri Miyabara-Treschuk	Regan Spencer
Kalani Kaanaana	Mariana Monasi	Linsey Stokes
Iokepa Kaeo	Makana Nalehua	Mariette Strauss
Kyle Kajihiro	Jarika Naputo	Alisha Summers
Kaimana Kanekoa	Luke Nemy	Carol Titcomb
Kawena‘ulaokalā Kapahua	Jacob Noa	Michael Tom
‘Alihilani Katoa	Kalani Nozaki	Emily Townley
Aaron Katzeman	Amy O.	Grace Tsubaki-Noguchi
Kara Kelai	Kiana Otsuka	Annette Mehana Unten
Darius Kila	Lysandra Padeken	Ashlee Valeros
Gwen Kim	Aleka Pahinui	Brandon Valeros
Miya King	Koohan Paik-Mander	Anna van Dorsten
Kari Leah Labrador	U‘ilani Perry	Christina Vien
Ara Laylo	Barbara Pope	Viana Villasenor
Tom Lenchanko, Aha Ula Puuhonua Kukaniloko	Deborah Pope	Emma Villemarette
Claudia Leung	Shelly Preza	Karen Vitulano, US EPA, Region IX
Nikos Leverenz	Pumehana Puaoi-Perry	Purdyka Wahilani
Meredith Linhart	India Pyzel	John Witeck
Kauwila M.	Jordan Ragasa	Anastacia Wolfgramm-Pineda
Uahikea Maile	Ikaika Ramones	Troy Wong
Rebecca Mattos	Andy Rivers	Aree Worawongwasu
Sorcha McCarrey	Anjoli Roy	Kristen Young
Douglas McCracken	Kawai Santiago	Aipohaku (no last name provided)
	Taylor Saunders	
	Alana Siaris	

Concerns associated with perceptions of some Native Hawaiians and the current social climate regarding military use of Hawaiian lands are discussed in **Section 3.12** of the EIS. These general concerns were raised by over 130 commenters. Concerns by commenters included a need to solicit input from community organizations of how these lands may be essential to missions and visions (meaningful engagement), protected person status under international law, and fair treatment on indigenous lands. Environmental justice concerns also included the terms of the original 1964 leases and the perceived inequities associated with the original leases. **Section 3.12** also discusses how a more equitable exchange could provide value to the Hawaiian people, such as via fair market value compensation, land exchanges, and funding for Native Hawaiian community benefits.

USEPA defines environmental justice as “the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.” It goes on to clarify that “no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental, and commercial operations or policies” (USEPA, 2022). A 1996 USEPA memorandum on evaluating health risks to children states, “In these cases where there may be an impact on children you should specifically address the question (of whether there are potential disproportionate impacts on children) even if it turns out that effects (on children) are not significant. However, if it is reasonably clear from the nature of the Proposed Action that there will be no disproportionate impact, there is no reason to require any discussion” (USEPA, 1996).

Additionally, there are two EOs that address both environmental justice and protection of children. EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, directs Federal agencies to identify and address the disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations. EO 13045, *Protection of Children from Environmental Health Risks and Safety Risks*, specifically indicates that analysis should consider environmental risks to health or safety that are attributable to products or substances that children are likely to come into contact with or ingest.

The environmental justice analysis focuses on whether there would be impacts on the natural or physical environment (as indicated in the respective resource sections) that would result in disproportionately high and adverse impacts on low-income, minority, and Native Hawaiian populations. Geographic information system mapping is used to identify areas that are considered low-income, minority, or Native Hawaiian population areas.

To determine whether there would be disproportionately high and adverse impacts on environmental justice populations, analysis from each resource area is considered. Generally, if a resource area analysis indicates that the Proposed Action would have no impact or a less than significant impact, the Proposed Action is unlikely to have an adverse impact on environmental justice populations. If a resource area analysis indicates that there would be a significant impact that would, broadly interpreted, harm the health, safety, well-being, or culture of environmental justice populations, then that is considered an adverse impact and determined to be a significant impact related to environmental justice.

## **Transportation and Traffic**

### Commenters

Melodie Aduja,  
Environmental Caucus of the  
Democratic Party of Hawai‘i  
Jade Butay  
Amber Herzog Lyman

Kyle Kajihiro  
Roberts Leinau  
Shelley Muneoka, KAHEA:  
The Hawaiian Environmental  
Alliance

Kathleen M. Pahinui  
Patrick Watson  
Joe Wilson

A few comments received on transportation were related to traffic on the North Shore. The Proposed Action involves no changes to ongoing activities conducted within the State-owned lands retained and no changes to use of the local roadways, airports, and harbors. The Proposed Action alternatives vary from full retention to no retention of the State-owned lands, which would result in the same or less use of

existing KTA, Poamoho, and MMR and the local and regional roadway system that includes interstate freeways to neighborhood streets. The roadway system is maintained by the Hawai'i Department of Transportation and the City and County of Honolulu's Department of Facility Maintenance. Interstate freeways on O'ahu are grade-separated and access-controlled and include H1 between Kapolei and Kahala, H2 between Wahiawā and H1, H3 between Halawa and Kaneohe Marine Corps Base Hawaii, and Moanalua Freeway (H201) connecting H1. These freeways, plus Kamehameha Highway and Farrington Highway, provide connections between the O'ahu training areas. Wheeler Army Airfield and Joint Base Pearl Harbor-Hickam support Army troop and equipment deployment by air and sea overland to and from the training areas. Units are transported by a combination of vehicles, sea transport vessels, and aircraft depending on the type and location of training. The Army publishes media releases to local newspapers, radio stations, and online (via the USAG-HI website) to provide advanced notice of upcoming convoys and training activities occurring at KTA, Poamoho, and MMR. The USAG-HI PAO 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 Hawai'i Department of Transportation, Statewide Transportation Planning Office. **Section 3.13** of the EIS summarizes the results of a qualitative traffic analysis of the Proposed Action addressing Army-related vehicular use on existing transportation infrastructure, including the effects on bicycle/pedestrian use along roadways, peak hour traffic volumes, public safety, and access by emergency response agencies.

## **Airspace**

### Commenters

Melodie Aduja,  
Environmental Caucus of the  
Democratic Party of Hawai'i

Mark Robinson  
Joe Wilson

Comments received expressed concerns with airspace and specifically noise generated military helicopters. Military aircraft in Hawai'i comply with all Federal Aviation Administration (FAA) guidelines and requirements to ensure safe airspace usage, minimize airspace usage conflicts, and comply with all established flight routes and noise abatement procedures. In addition to FAA guidelines and requirements, Army airspace operations are subject to AR 95-1, *Flight Regulations*, which includes airspace usage, safety, and noise abatement procedures. To abate noise impacts on residential areas, Army pilots are trained to avoid unnecessary flights over populated areas and to avoid all residences, including those in very sparsely populated areas as outlined in the *Installation Compatible Use Zone Study* (USAG-HI, 2017d). Further information regarding aircraft-related noise and safety is included in **Section 3.14**.

Military aircraft flying over KTA and Poamoho are permitted to use the Wheeler Army Airfield Alert Area 311 airspace, which extends from the ground surface up to an altitude of 500 feet above ground level (AGL) from 0700 to 2300 hours, and allows for low-altitude military helicopter training. Military aircraft flying over MMR train within the following restricted airspaces:

- R-3110 A, which extends from the ground surface up to, but not including, 9,000 feet AGL directly above MMR



- R-3110 B, which extends from 9,000 feet AGL up to, but not including, 19,000 feet AGL above MMR
- R-3110 C, which extends from the ground surface up to, but not including, 9,000 feet AGL adjacent to MMR to the north and east
- R-3109 A, which extends from the ground surface up to, but not including, 9,000 feet AGL adjacent to MMR and R-3110 A and R-3110 B
- R-3109 B, which extends from 9,000 feet AGL up to, but not including, 19,000 feet AGL and above R-3109 A
- R-3109 C, which is adjacent to R-3109 A below R-3109 B and extends from the ground surface up to, but not including, 9,000 feet AGL

The Army would continue to permit and coordinate training, including aviation training operations, on the State-owned lands by other government users such as the U.S. Marine Corps and Hawaii Army National Guard in accordance with existing flight and safety regulations and noise abatement policies and procedures. Current military aircraft and airspace activities are documented in the existing *2018 Programmatic Agreement among 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 Training Areas and Ranges on the Island of O'ahu, Hawai'i* and the *2008 Oahu Implementation Plan*, recent biological opinions, and various resource management plans for the three training areas.

### Electromagnetic Spectrum

#### Commenters

Melodie Aduja,  
Environmental Caucus of the  
Democratic Party of Hawai'i

Makanalani Gomes  
Angela Huntemer-Sidrane

Keahi Piiohia

Comments were submitted expressing concern about possible electromagnetic radiation and its impacts. The EMS-generating equipment at KTA, Poamoho, and MMR, and the potential health and safety risks associated with the EMS were considered and EMS was not carried forward for detailed analysis for reasons discussed in **Section 3.1.4**. The Proposed Action itself would not introduce new sources of electromagnetic fields or radiation. Under the alternatives in which land would not be retained, the Army would adhere to applicable Federal and State laws regarding investigation, removal, and cleanup of hazardous substances and wastes, including those potentially involving electromagnetic radiation, on the State-owned lands not retained.

### Utilities

#### Commenters

Melodie Aduja,  
Environmental Caucus of the  
Democratic Party of Hawai'i

Amber Herzog Lyman  
Kyle Kajihiro

Ernest Y.W. Lau, P.E., Board  
of Water Supply, City &  
County of Honolulu

Comments, including an agency letter from the Board of Water Supply, reflected concerns of groundwater and aquifer contamination from wastewater disposal systems. The Army currently conducts ground-based training at KTA. Potable water for military training activities at KTA is brought in by truck, and solid waste is collected by a licensed contractor. The limited wastewater utility infrastructure at KTA is not located on State-owned land. A currently inactive U.S.-Government-owned east-west communication line crosses the southern portion of Tract A-3. Electricity and stormwater infrastructure are not present at KTA. Power used during training at KTA is provided from portable generators. Potable water, solid waste, and portable generator services at KTA would continue for training activities on State-owned land retained, with no new construction or modernization. The U.S.-Government-owned communication line would be removed or abandoned in place if Tract A-3 is not retained by the Army.

No ground-based training currently occurs at Poamoho, and no utility services are present. There would be no utility additions at Poamoho under the Proposed Action.

MMR has the most utility services of the three training areas, but the infrastructure is limited. Currently inactive communication lines and a USGS water line cross State-owned land on MMR. Potable water, wastewater, stormwater, electrical, and solid waste utility infrastructure and services are present on U.S. Government-controlled land and not on State-owned land. Under the Proposed Action, the Army would continue to maintain and operate the current utility infrastructure at MMR with no new construction or modernization, but communication lines operated by the Army that cross any State-owned land not retained would be removed or abandoned in place.

## Human Health and Safety

### Commenters

Abbi Abshire	Lauren Ballesteros- Watanabe	Valerie Crabbe
Melodie Aduja, Environmental Caucus of the Democratic Party of Hawai’i	Chelsea Barbee	Makanamakamaeonalani DaMate
Noelani Ahia	Andrea Barnes	Diana Dannoun
Jim Albertini, Malu ‘Aina Center For Non-violent Education & Action	Lauren Harmony Blissett	Mara Davis
Carrie Alford	Jonah Bobilin	Ashley De Coligny
Chloe Amos	Madison Brown	Keoni DeFranco
Joseph Anderson	Karly Burch	Sierra Dew
Leilani Antone	Cheryl Burghardt	Tiana Dole
Aida Ashouri	Czeska Cabuhat	Joy Enomoto, Women's Voices Women Speak
Carley Atkins	Amy Cameron	Malia Evans
Bronson Azama	Kenji Cataldo	Sasha Fernandes
Adnan B.	Solomon Champion	Jonathan Fisk
Adele Balderston	Anna Chua, The Sierra Club of Hawai’i	Chris Foster
	Mary Clapp	Makanalani Gomes

Lisa Grandinetti	Meleanna Meyer	Keith Scott
Tina Grandinetti	Yuri Miyabara-Treschuk	Sheela Sharma
Dee Green	Kane Kumu Honua Kama- kapu Mo‘i Kamehameha, Sovereign Kamehameha Dynasty Government	Joseph K. Simpliciano Jr.
Tyler Greenhill		Samantha Snively
Cameron Grimm		‘Ilikea Snow
Carolyn Hadfield	Mariana Monasi	Chays Souza
David Henkin, Earthjustice on behalf of Malama Makua	Zack Murphy	Mariette Strauss
Shannon Hennessey	Makana Nalehua	Alisha Summers
Pomai Hoapili	Jarika Naputo	Liysa Swart
Rebecca Hogue	Luke Nemy	Drew Tanda
Angela Huntemer	Amy O.	Kelsey Thornberry
Jeanne Ishikawa, Wahiwā- Whitmore Village Neighborhood Board No. 26	Shannon Lokelani Oberle	Carol Titcomb
Kalani Kaanaana	Lysandra Padeken	Michael Tom
Iokepa Kaeo	Aleka Pahinui	Emily Townley
Kyle Kajihiro	Merle Pak	Grace Tsubaki-Noguchi
Kawena‘ulaokalā Kapahua	Amy Parsons	Annette Mehana Unten
‘Alihilani Katoa	Marisa Plemer	Brandon Valeros
Aaron Katzeman	Barbara Pope	Christina Vien
Katherine Kealoha	Deborah Pope	Viana Villasenor
Kara Kelai	Shelly Preza	Karen Vitulano, US EPA, Region IX
Gwen Kim	Michaela Primacio	Purdyka Wahilani
Miya King	Pumehana Puaoi-Perry	Adam Wayson
Ara Laylo	India Pyzel	Joe Wilson
Oriana Leao	Jordan Ragasa	John Witeck
Roberts Leinau	Ikaika Ramones	Anastacia Wolframmm- Pineda
Claudia Leung	Michael Reimer, Ph.D.	Nancy Wond
Uahikea Maile	Andy Rivers	Troy Wong
Rebecca Mattos	Tara Rojas	Tom Wright
Sorcha McCarrey	Abigail Rose	Kristen Young
Douglas McCracken	Anjoli Roy	Anne Zellinger
	Kawai Santiago	Unidentified Caller #9
	Taylor Saunders	

Health and safety concerns were raised by over 100 commenters. Concerns included contamination of food from MC, lands deemed unsafe by live-fire training, wildfires, and flight accidents. The Proposed Action does not include additional health and safety measures beyond what is currently implemented by

the Army. Ongoing activities within the State-owned lands were previously addressed in separate PAs, implementation plans, biological opinions, and resource management plans.

The EIS characterizes the health and safety conditions for military personnel and the surrounding communities from ongoing activities on the State-owned lands. Characterization of the existing health and safety conditions includes consideration of relevant safety reports and health studies, as well as additional information, such as how the Army works with local entities to provide essential police and emergency medical services to KTA, Poamoho, MMR, and the surrounding communities. The potential health and safety effects on military personnel and the community under each of the alternatives are analyzed in **Section 3.14**. The section also addresses the relationship between wildland fire and military presence on O'ahu. Per the *Army Wildland Fire Policy Guidance Memorandum* dated September 4, 2002, and AR 200-1, the Army implements and adheres to an *Integrated Wildland Fire Management Plan* that provides wildland fire management and operational protocols to meet land management goals and objectives.

Historic and current land uses for the State-owned lands at KTA and Poamoho include military training, recreational hiking, and hunting. No ranges are present on the State-owned lands at KTA and Poamoho. Additionally, suspected UXO has not been found within the State-owned lands at KTA or Poamoho. Public access to the recreational trails at Poamoho is allowed by permit on weekends and holidays. Tract A-1 at KTA includes a motocross facility managed under a permit issued by DLNR. Tract A-3 is part of the Pūpūkea-Paumalū Forest Reserve, which has recreational trails and a public hunting area. Access to these two tracts is limited with the exceptions of the motocross facility, public hunting area, and recreational trails, which can be accessed on weekends and holidays (USACE-POH & USAG-HI, 2017c; USACE-POH & USAG-HI, 2017a).

The State-owned land at MMR consists of 782 acres, of which 722 acres have been subject to past live-fire activities. The North Ridge, Center, and South Ridge Tracts require authorization and coordination with U.S. Army Range Control for access, and UXO training and a UXO specialist escort may also be required. Hunting is not allowed at MMR. The North Ridge, Center, and South Ridge Tracts of the State-owned land at MMR are within the Mākua Valley and are used for Army tactical training (USACE-POH & USAG-HI, 2017b). Following all training exercises the Army conducts routine range management activities to ensure that no materials, to include debris, trash, and brass are left behind (USAG-HI, 2015a). Currently, military training is not conducted within the Makai Tract. When suspected UXO is found in a training area, it is reported to Range Control, and the explosive ordnance disposal (EOD) team investigates to identify the item and determine whether it is hazardous, can be removed, or must be destroyed in place. If destroyed in place, any remnants are removed following destruction (USAG-HI, 2018a).

The remaining State-owned land at MMR is within the Makai Tract, which was used in the past as an amphibious landing site with occasional small arms ammunition and military munitions use. Because the Army has performed surface and subsurface clearance of UXO and discarded military munitions to reduce the risk of encounters with MEC, this area does not require authorization for access. Information regarding other contamination on State-owned lands at KTA, Poamoho, and MMR is included in **Section 3.6**.

Currently, live-fire training exercises do not occur on State-owned lands at KTA, Poamoho, or MMR, and there are no current or former impact areas within the State-owned lands. Live-fire training exercises have not occurred on State-owned land at MMR since 2003 (USAG-HI, 2021i; USACE-POH & USAG-HI, 2017c; USACE-POH & USAG-HI, 2017a; USACE-POH & USAG-HI, 2017b).

Aviation training at KTA, Poamoho, and MMR includes maneuver flight operations using various aircraft, aviation support operations, and low-altitude helicopter maneuvers that are all conducted in accordance with FAA regulations and DoD and Army flight safety policies and instructions.

Additional health and safety conditions, including wildfire risk and prevention measures on State-owned lands, personnel and community safety, emergency services, and health and safety actions related to aviation training, are addressed in the EIS.

## E-1.4 EIS Findings

This subsection includes responses to comments on reasonably foreseeable/cumulative impacts and mitigation measures.

### Reasonably Foreseeable/Cumulative Impacts

#### Commenters

Abbi Abshire	Mary Clapp	Makanalani Gomes
Kerstyn Afuso	Lynell DaMate	Lisa Grandinetti
Noelani Ahia	Makanamakamaeonalani	Tina Grandinetti
Carrie Alford	DaMate	Dee Green
Raed Alsemari	Diana Dannoun	Tyler Greenhill
Kelsey Amos	Sasha Davis	Cameron Grimm
Leilani Antone	Mara Davis	Shannon Hennessey
Carley Atkins	Ashley De Coligny	Tai Hino
Adnan B.	Keoni DeFranco	Pomai Hoapili
Lauren Ballesteros-	Matthew Dekneef	Rebecca Hogue
Watanabe	Sierra Dew	Renee Hoomanawanui
Chelsea Barbee	Tiana Dole	Angela Huntemer-Sidrane
Lauren Blissett	Jamie Echols	Sam Ikehara
Jonah Bobilin	Jordan Elicker	Andrea Kaaawa
Puanani Brown	Joy Enomoto, Women's	Kalani Kaanaana
Madison Brown	Voices Women Speak	Iokepa Kaeo
Karly Burch	Malia Evans	Kyle Kajihiro
Cheryl Burghardt	Kiersten Faulkner, Historic	Kawena‘ulaokalā Kapahua
Czeska Cabuhat	Hawaii Foundation	‘Alihilani Katoa
Amy Cameron	Sasha Fernandes	Aaron Katzeman
Kenji Cataldo	Jonathan Fisk	Kara Kelai
Liam Chinn	Chris Foster	Gwen Kim
Anna Chua, The Sierra Club	Jonathan Galka	Miya King
of Hawai‘i	Sergi Gimenez	

Ara Laylo	Lysandra Padeken	Mariette Strauss
Claudia Leung	Aleka Pahinui	Alisha Summers
Uahikea Maile	U’ilani Perry	Drew Tanda
Rebecca Mattos	Barbara Pope	Grace Tsubaki-Noguchi
Sorcha McCarrey	Deborah Pope	Adam Tuifagu
Douglas McCracken	Shelly Preza	Annette Mehana Unten
Kalia Medeiros	Pumehana Puaoi-Perry	Ashlee Valeros
Meleanna Meyer	India Pyzel	Brandon Valeros
Yuri Miyabara-Treschuk	Jordan Ragasa	Anna van Dorsten
Rita Miyamoto	Ikaika Ramones	Christina Vien
Mariana Monasi	Andy Rivers	Viana Villasenor
Shelley Muneoka, KAHEA: The Hawaiian Environmental Alliance	Anjoli Roy Kawai Santiago	Purdyka Wahilani John Witeck
Makana Nalehua	Nic Santos	Anastacia Wolfgramm- Pineda
Jarika Naputo	Taylor Saunders	Troy Wong
Luke Nemy	Sheela Sharma	Kristen Young
Amy O.	’Ilikea Snow	

There were more than 100 comments received regarding potential cumulative impacts. These comments however contained specific concerns with cumulative impacts on specific resources. These comments are therefore captured within the resource sections and scoping summaries to which they pertain. As described in Council on Environmental Quality NEPA implementing regulations, an EIS “shall succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration, including the reasonably foreseeable environmental trends and planned actions in the area(s)” (40 CFR Section 1502.15). Reasonably foreseeable means “sufficiently likely to occur such that a person of ordinary prudence would take it into account in reaching a decision” (40 CFR Section 1508.1[aa]).

**Chapter 3** presents a set of reasonably foreseeable actions and describes environmental trends on O’ahu. Reasonably foreseeable actions include both Federal and non-Federal actions, including potential Army actions at the three training areas, as well as substantial private developments that may affect O’ahu’s environment. Environmental trends consider historical environmental consequences and how a continuation of these trends may affect the environment into the future.

In addition to analyzing the environmental consequences of the Proposed Action, each resource area covered in the EIS analyzes the environmental impacts associated with the reasonably foreseeable actions and environmental trends. 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 would 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.

## Mitigation Measures

### Commenters

David Henkin, Earthjustice on behalf of Malama Makua                      Michaela Primacio

A couple commenters expressed the need and process under NEPA to formulate mitigation measures. Other comments included suggestions of possible mitigation measures such as community observers to monitor military activities and funding for community peer review of Army studies.

Mitigation measures avoid, minimize, or compensate for adverse impacts caused by a proposed action. When the EIS identifies adverse impacts that are not avoided, minimized, or compensated for via BMPs or SOPs, the EIS proposes mitigation measures that can generally include the following:

- Avoiding the impact altogether by not taking a certain action or parts of an action
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation
- Rectifying the impact by repairing, rehabilitating, or restoring the affected environment
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action
- Compensating for the impact by replacing or providing substitute resources or environments

When adverse impacts are identified, relevant resource areas of the EIS propose mitigation measures that would avoid, minimize, or compensate for adverse impacts specific to that resource. The EIS, however, does not determine the final set of mitigation measures; the final set of mitigation measures is codified in the ROD.

In some cases, adverse impacts cannot be mitigated. In cases such as this, the EIS states whether the Army has adopted all practicable means to avoid or minimize the adverse environmental impact. The Army will furthermore, after signing of the ROD, adopt and summarize, where applicable, a monitoring and enforcement program for any enforceable mitigation requirements or commitments.

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## **E-2: Responses to Draft EIS Comments**

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## Appendix E-2

# General Response

Thank you for providing input to the ATR O'ahu Draft EIS. Your comment has been made part of the Administrative Record for this 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 11-200.1-26[a])." For the purposes of 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 received this general response because they do not pertain to the Proposed Action or alternatives; pertain to locations or activities at KTA, Poamoho, and MMR, but outside of State-owned lands; pertain to impacts associated with activities at KTA, Poamoho, and MMR, but outside of State-owned lands 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 Federal and State laws; recommend use of land that does not support the purpose and need; or provide broad, open-ended questions.

## Form Letters

### E-2.1 Form Letter A

Protection of our Environment:

- The Army admits to harming the land and environment in the Draft EIS. The Army admits there will be "significant adverse impacts" on land use (land tenure) and environmental justice with the retention of any lands at Kahuku, Poamoho, and Mākuā.
- The Army does not commit to clean up these lands until after the EIS is finalized, and vague terms in the 1964 leases do not require future clean up actions.
- The U.S. military has never returned Hawaiian lands in any usable state.
- The lands in Mākuā, Poamoho, and Kahuku are home to dozens of endangered organisms found nowhere else in the world.
- The Draft EIS underestimates the impact of noise and other training activities on native species, providing insufficient evidence for its conclusions.

#### Kānaka Maoli Self-Determination:

- Kānaka Maoli never relinquished their rights to these lands and their sovereignty over them was never extinguished.
- The Admissions Act (a federal law) set aside these stolen lands to be held in a public trust for five purposes including the betterment of the conditions of native Hawaiians as defined in the Hawaiian Homes Commission Act, 1920.
- These Hawaiian Kingdom Crown and government lands were taken without consent or compensation.
- These leases were awarded to the U.S. Army for only \$1 for 65 years.

#### Transparency and Cultural Access:

- There hasn't been full disclosure of military activities on leased lands and adjacent federal lands.
- The Army's restrictive cultural access policies hinder Kānaka Maoli cultural practices and access to numerous historical and sacred sites at these "training areas."
- The DEIS fails to address long-term impacts of limited cultural access to these lands.
- The DEIS minimizes the impact on cultural practices and historic sites, focusing only on state lands, and not considering the broader cultural and historical context

#### Housing:

- The presence of military personnel exacerbates housing competition, decreasing the availability of affordable housing and impacting local residents, adversely impacting local residents and contributing to the displacement of Kānaka Maoli.
- The DEIS does not assess the impact of continued military operations on an island already facing a housing crisis.

#### Climate Change & Water:

- The DEIS fails to address the cumulative effects of military training on both state and federal lands. Hazardous substances on federal lands pose a risk to state lands and surrounding communities.
- The Army's cleanup commitments are limited by economic feasibility which may leave contamination unaddressed.

## E-2.2 Form Letter A Response

Please see General Response.

**Section 3.6, Hazardous Substances and Hazardous Wastes; Section 4.2, Incomplete Information and Unresolved Issues; Appendix J: Regulatory Framework:** Section 3.6.1 and Appendix J have been revised to add the definition of operational ranges. Current management measures to mitigate potential impacts from hazardous substances and hazardous wastes are discussed in Section 3.6.5.

Existing Conditions discussion in Section 3.6.5.3 provides the procedures in place at MMR for areas that contain or are likely to contain MEC. Text added to the Environmental Consequences discussion under

Section 3.6.5.3 states that the Army conducts range management activities to ensure that no materials, including debris, trash, and brass are left behind.

Lease compliance actions and cleanup and restoration activities that would occur upon lease expiration are discussed in Section 4.2.4.

**Section 3.3, Biological Resources; Section 3.8, Noise:** Additional discussions of noise impacts on native and protected species have been included in Sections 3.3.5 and 3.8 in the Final EIS.

Many studies (including one that was conducted at MMR and Schofield Barracks) have noted that birds and other wildlife have been documented to become habituated to aircraft overflights and other noises after continuous or frequent exposure.

**Section 3.2, Land Use:** Section 3.2.5 discusses public trust lands, the events of 1893 and the Apology Resolution in 1993.

**Section 2.4, Land Retention; Section 3.1, Introduction; Section 3.2, Land Use; Section 3.12, Environmental Justice; Appendix G: Land Retention Estate Assumptions:** The land tenure impacts in Land Use and Environmental Justice (Sections 3.2 and 3.12 of the EIS, respectively) acknowledge the lease price for the current leases. If lease would become the land retention method for the State-owned lands, the Army has stated that it would, in coordination with the State, provide a fair-market value for the leased State-owned land. The EIS has been revised in Sections 2.4, 3.1.3, and Appendix G 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.

**Section 1.1, Introduction:** Section 1.1.2 of the EIS describes military activities on State-owned lands. Military activities on Federal lands are outside the scope of this EIS.

**Section 3.4, Historic and Cultural Resources; 3.5, Cultural Practices; Appendix B: Cultural Impact Assessment:** The CIA (Appendix B) assesses the impacts on cultural practices within the broad geographical area, which is greater than the SOL.

The Army has no record of denying requested access if safety protocols are followed. The Army's cultural agreement documents at this link provide more information: <https://home.army.mil/hawaii/garrison/dpw/cultural-resources>.

OEQC guidelines recommend a geographic extent beyond the identified or typical boundaries of the project area for Cultural Practices, which is defined as an ROI of a one-mile buffer around the State-owned lands (see Section 3.5.3). NEPA and HEPA do not require the ROI to extend outside the geographic project area of the Proposed Action for Historic and Cultural Resources, thus the focus on State-owned lands plus a 100-foot buffer (see Section 3.4.3 of the EIS).

**Section 3.11, Socioeconomics; Section 3.12, Environmental Justice:** Sections 3.11.5.1, 3.11.5.2, and 3.11.5.3 discuss KTA, Poamoho, and MMR socioeconomic conditions, respectively. These sections discuss the housing supply for the three areas and note that demand for these areas shows a deficit. Additionally, the sections note that the alternatives would not result in population and growth impacts, and therefore there would be no new impacts on housing.

Section 3.12 socioeconomic subsection, which includes housing, notes this would not disproportionately and adversely affect communities with environmental justice concerns. Section 3.12 has been revised to state that housing deficits disproportionately affect Native Hawaiian people. This impact is not exacerbated by the Proposed Action alternatives because it does not involve any addition of military personnel to Hawaii.

**Chapter 3, Affected Environment and Environmental Consequences; Section 3.6, Hazardous Substances and Hazardous Wastes; Appendix J: Regulatory Framework:** An analysis of the cumulative impacts of the Proposed Action and combined with past, present, and reasonably foreseeable future actions for all resource areas in Chapter 3.

Military activities on federal lands are outside the scope of this EIS.

Section 3.6.1 and Appendix J has been revised to add the definition of operational ranges. Current management measures to mitigate potential impacts from hazardous substances and hazardous wastes are discussed in Section 3.6.5.

Existing Conditions discussion in Section 3.6.5.3 provides the procedures in place at MMR for areas that contain or are likely to contain MEC. Text added to the Environmental Consequences discussion under Section 3.6.5.3 stating “as noted under Existing Conditions, following all training exercises, the Army conducts routine range management activities to ensure that no materials, including debris, trash, and brass are left behind.”

## E-2.3 Form Letter A: List of Submittals

Stacey Alapai  
C. Burghard  
Elizabeth Daugherty  
Ann Dorsey  
Damiana Espiritu  
Patricia Gardner

Greenpeace Hawaii (Dave  
Mulinix)  
Beth Herrmann  
Georgia Hoopes  
Micky Huihui  
Hideki Kimukai

Malu ‘Aina (Jim Albertini)  
Julia Marrack  
Hayley Peter-Contesse  
Geoffrey Saign  
Timothy Eliel Starbright  
Laura Toyofuku-Aki

## E-2.4 Form Letter B

NOTICE OF DECLARATION OF: On this holy day 7th day of Iulai 2024; Now comes, in the flesh and blood, living soul created by God, self governing individual and ambassador of christ having taken dominion over the juris of the Land, Air, and the Water of Law, as sui juris, as principal, as fiduciary, as trustee, a woman/man, a keiki of God; By divine appearance status standing in Dominion as Kanaka Maoli DECLARATION As a lineal descendant of the Iwi kupuna of Makua valley, as a kanaka maoli, as a kia’i, as a kahuna, as konohiki, as a keiki of the soil of my ancestors of Ko Hawaii Pae ‘aina; substantiates my claim to speak for Pono protection, rehabilitation, remediation and traditional customary burial procedures; make this declaration of my free will and truth. My ‘oia’i’o must be considered in regards to the process that is applied in this valley to ensure our ancestor ‘aina has no further desecration. This notice serves to inform you the denial of your request to re-lease Makua Valley. As a lineal descendant of the Kupuna iwi, Akua of these lands of the pae ‘aina, of those forcibly removed from Makua Valley by Executive Order of the United

States Inc., I am compelled to address the grievous actions and their impact on our ancestral lands, heritage and the continued acts of Genocide upon kanaka maoli.

Makua Valley has been appropriated and transformed into a military training ground, causing irrevocable damage to the land, water resources, natural habitats, sacred sites, and historical artifacts belonging to our family, the Ali'i, Ko Hawaii Pae 'aina. The continuous military activities, including live weapon practice, have severely degraded the environment, disrupting the natural balance and desecrating culturally significant, sacred and sensitive areas. We, the descendants of the original awardees, categorically do not condone or permit the continued use of Makua Valley for military purposes. The persistent destruction of this sacred land is unacceptable, and we hereby demand the following Reparations to the lineal descendants of the original awardees of Makua Valley. Financial reparations for the loss of use, access, cultural practices, and sustenance caused by the occupation and degradation of Makua Valley by the United States military This includes a compounded compensation to each allodial title descendant, kanaka maoli of the Ko Hawaii Pae 'aina to be calculated from the time of force removal till present for each allodial title for each generation of descendants of the original awardee. Ie: great grandmother, great grandfather, grandmother, grandfather, etc. This notice is made under the doctrine of "Notice to Principal is Notice to Agent and Notice to Agent is Notice to Principal." Therefore, all parties within the municipal body corporate and the United States of America and the United States Inc; Military all branches; State of Hawaii/ city and county of honolulu/DLNR, any and all entities, corporate bodies as agents of occupation are hereby informed of our position and demands regarding Makua Valley. We expect an acknowledgment of this notice and a prompt response addressing our demands within 10 days. Failure to do so will result in further legal action to reclaim our ancestral rights and seek just compensation for the damages incurred.

Seal \_\_\_\_\_ DATE: \_\_\_\_\_ LINEAL DESCENDANT OF \_\_\_\_\_ Royal Patent \_\_\_\_\_ LCA \_\_\_\_\_ Ahupua'a Kakahanaiki, Moku Wai'anae, Moku Puni Oahu Witness: \_\_\_\_\_

## E-2.5 Form Letter B Response

Please see General Response.

## E-2.6 Form Letter B: List of Submittals

James Cowles	Mialisa Otis	Form Letter B 2 [Illegible Signature]
Michael W.K. Eli	Misty Peoram	Form Letter B 3 [Illegible Signature]
Bernadette Fernandez	Nanipua Peterson	Form Letter B 4 [Illegible Signature]
Zeona Holoholokulani	Awapuhi S.Kalauli Robinson	Form Letter B 5 [Illegible Signature]
Makanoe Hufana	Laulani Teale	
Keke Manera	Form Letter B 1 [Illegible Signature]	
'Alohilani Nāho'oikaika-Medeiros		

## E-2.7 Form Letter C

The United States Army, Military presence in Hawai'i puts a target on our islands. With global tensions mounting, the US military presence, does not offer us protection, but instead, threatens the safety and wellness of Hawai'i both externally and internally.

The framing of this proposal as a mere "real-estate" action is offensive. What is being proposed is another 65 years of disconnection from these lands. 3 more generations of being used to rehearse the destruction of others' homelands and killing of the people who live there. The legacy and ongoing presence of the military in Hawai'i is one of toxic abuse. This history includes, but is not limited to: evictions/blocked access, burial desecration, intentional bombing of cultural sites, irreparable pollution of lands and waters with toxins (like jet fuel and PFAS) and/or UXOs, destruction of native habitat with impact to rare plants and animals and perhaps hardest to measure, impacts on practices and connections to places from which we are cut off. The military presence in Hawai'i has already caused grave harm to our natural and cultural environment and the Army retaining these leases will only extend a bad situation.

The Army assumes, without basis, future lease terms would be the same and does not assess or propose new lease terms. This is presumptuous considering what poor stewards the military has been. The state should inspect the conditions of these lands before considering a renewed lease. The Army should clean and restore the lands they've held for 60 years, to support their claim that despite their atrocious track record, they can be trusted with these special places. The Army should not be allowed to contaminate land without cleaning it up, simply because it is too expensive. The DEIS says that the Army 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 expenditures for removal of shells will not exceed the fair market value of the land." If you can't afford to clean it up, don't contaminate it in the first place.

DEIS fails to meaningfully evaluate socioeconomic impacts of continued Army presence 38% of arrests resulting from Operation Keiki Shield (a coordinated effort involving local, state, and federal law enforcement agencies tasked with the investigation and prosecution of internet-facilitated crimes against children) were active-duty military personnel.

Large housing allowances mean military personnel outcompete locals in a very tight rental market. Basic Allowances for Housing (BAH) range from \$2,256-\$4,638 depending on one's rank and whether or not they have dependents. This money is tax-free and exacerbates an already dire housing crisis.

DEIS dismisses cultural impacts through a disingenuous process and fails to address the long-term impacts of little or no access. Though they didn't ask, the DEIS repeatedly faults community members for not providing specific locations within the project area for different cultural resources or practices. If specific locations within state-lands was the standard for cultural practices to be considered relevant to the DEIS, the Army should have said as much. If the Army was genuine in learning about how cultural practices may be impacted by their actions, it could have simply asked community members whether or not any of the practices mentioned occur within the state-lands in question. It is disingenuous that they did not ask such an obvious follow-up question. It is poor logic to assume that because people did not, unprompted, volunteer specific locations of their cultural practices, that they do not occur on the relevant state lands.



DEIS fails to consider the impacts of maintaining the status quo. What is the impact of NOT using these lands to address the many pressing issues our communities face? These include but are not limited to affordable housing, food insecurity, energy independence, and climate change.

## E-2.8 Form Letter C Response

Please see General Response.

**Section 3.4, Historic and Cultural Resources; Section 3.5, Cultural Practices; and Section 3.12, Environmental Justice:** Sections 3.4 and 3.5 address cultural sites and cultural access. Sections 3.12.5 and 3.12.6 further discuss impacts on land use and cultural practices specifically for communities with environmental justice concerns.

**Section 3.3, Biological Resources; Section 3.6, Hazardous Substances and Hazardous Wastes; Appendix F: NEPA and other Environmental Planning Documents and Existing Management Measures:** Section 3.6.5. has been revised to state that the Preliminary Assessment/Site Investigation (PA/SI) evaluated sources of PFAS other than aqueous film-forming foam, including metal plating operations, photo-processing areas, wastewater treatment plants, pesticides, and landfills. The purpose of the PA/SI was to identify areas of potential interest (AOPIs) where PFAS-containing materials were used, stored, and/or disposed of, or areas where known or suspected historical releases to the environment occurred. The PA/SI for KTA, Poamoho, and MMR concluded that there were no AOPIs; therefore, no further PFAS investigations at these installations are warranted.

Section 3.6.5 discusses the Military Munitions Response Program and Munitions and Explosives of Concern, including UXO; and Section 3.3.5 and Appendix F describes practices to avoid impacts on wildlife.

**Section 3.2, Land Use; Section 3.6, Hazardous Substances and Hazardous Wastes; Appendix F: NEPA Documents, BMPs, SOPs, Mitigation Measures, and Management Measures; Appendix G: Land Retention Estate Assumptions; Appendix J: Regulatory Framework:** Appendix J has been revised to add the definition of operational ranges and the rule's applicability to MEC cleanup actions on the State-owned land to the description of the Military Munitions Rule. Current management measures to mitigate potential impacts from hazardous substances and hazardous wastes are discussed in Section 3.6.5.

The Existing Conditions discussion in Section 3.6.5.3 provides the procedures in place for areas that contain or are likely to contain MEC. Text added to the Environmental Consequences discussion under Section 3.6.5.3 stating "as noted under Existing Conditions, following all training exercises, the Army conducts routine range management activities to ensure that no materials, including debris, trash, and brass are left behind."

Appendix G includes a copy of the leases for the lands that are subject of this EIS. Section 3.2.5 has been revised to include the status of State inspections of the leased properties.

**Section 3.11, Socioeconomics:** This issue, while concerning, is not related to the Proposed Action or associated cumulative impacts, and are therefore not addressed in the EIS. Sections 3.11.5.1, 3.11.5.2, and 3.11.5.3 discuss KTA, Poamoho, and MMR, respectively, regarding crime from a socioeconomic aspect. Operation Keiki Shield is unrelated to the Proposed Action and outside the scope of this EIS.

**Section 3.11, Socioeconomics:** Sections 3.11.5.1, 3.11.5.2, and 3.11.5.3 discuss KTA, Poamoho, and MMR socioeconomic conditions, respectively. These sections discuss the housing supply for the three areas and note that demand for these areas shows a deficit. Additionally, the sections note that the alternatives would not result in population and growth impacts, and therefore there would be no new impacts on housing.

**Section 3.5 Cultural Practices; Appendix B: Cultural Impact Assessment:** Section 3.5.5 provides a summary of Native Hawaiian beliefs obtained from interviewees and survey respondents. 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 B.

**Section 2.5, Preferred Alternative; Section 3.6, Hazardous Substances and Hazardous Wastes:** Section 2.5 of the Final EIS has been revised to state the No Action Alternative is identified as the Preferred Alternative for Poamoho and MMR (i.e., where the State-owned land would not be retained). Section 3.6.5 states that the Army would retain responsibility for cleanup and restoration of land not retained. Text has been added that this is pending an agreement with the State allowing the Army access for necessary inspection and management of any contaminated sites. Future State use of the lands not retained by the Army is beyond the scope of this EIS.

## E-2.9 Form Letter C: List of Submittals

Noelani Ahia	Malia Everette	Sarah Martin
Nicole Anakalea	Thalia Fajans	Pedro Martinez
Paul Antico	Robert Fox	Mary McKenzie
Tanya Yamanaka Aynessazian	Sheila Gage	Douglas Meier
Lynn Azar	Emily Gambino	Judith Mick
Dierl Bagusto	Safia Gravel	Marilyn Mick
Michelle Becker	Cassandra Habura	Gerald Montano
Irena Bliss	Joan Heller	Robert Monteiro
Thomas Brandt	Fred Hofer	Maki Morinoue
Laurel Brier	Andrew Isoda	Alika Spahn Naihe
Abigail Calaceto	Mark Jakubowski	Tran Nguyen
April Ching	Hi’iaka Jardine	Koohan Paik-Mander
Darren Chow	Michael Jaubert	Janice Palma-Glennie
Glenn Choy	Ruta Jordans	Michelle Pillen
Amy Cook	Shania Kahepuu	Pua Pinto
Leslee Cook	Piikea Kalakau	Greg Puppione
Christopher Dean	Mary Lu Kelley	Tyler Rabara
Barbie Dofa	Tara S King	Phyllis Raquinio
Bob Douglas	Mikaela Kuester	Camille Rodrigues
Mary Drayer	Julie Lewis	Jotis Russell-Christian
Carolyn Eaton	Cynthia Luafalemana	Jun Shin
Carolyn Eaton	Nanahonua Manuel	Gail Spicuzza
Susan Emery	Carla Marin	Timothy Eliel Starbright
Julia Estigoy-Kahoonei	Bonnie Marsh	Susan Stayton

Sandra Stokes  
Tabitha Tatum  
Corey Taylor  
Nicki Tedesco  
Hau'oli Thielk  
Annette Tryon-Crozier  
Susanna W

Maria Walker  
Hedwig Warrington  
Valerie Weiss  
Naomi Wick  
MIA WILSON  
Brenda Wong  
Billy Woods

Malia Yoshioka  
Christie Young  
Jade Young  
Blake  
Jerika  
Madeleine

## E-2.10 Form Letter D

Form Summary Your name: \_\_\_\_\_ Email address: \_\_\_\_\_ Aloha, Please accept this as my personal testimony and comments regarding the US Army Draft Environmental Impact Statement (Draft EIS) on proposed retention of stolen Hawaiian Kingdom lands in Mākua Valley, Poamoho, Kahuku. Here are my comments on the Draft EIS: The Draft EIS does not acknowledge the depth of the generational harms that have resulted from the US military-aided illegal overthrow of the Hawaiian Kingdom, harms that would be exacerbated by the continued occupation and abuse of these stolen Hawaiian lands by the U.S. Department of Defense and its "allies". The Draft EIS fails to recognize the full range of benefits that Hawai'i could gain if the military ends its occupation of these lands, including for our food security, cultural integrity, and commitment to healing and reconciliation for the unjust, uncompensated, and nonconsensual taking of 'āina from the Kanaka Maoli people.

In the Draft EIS, the US Army admits that there will be "significant adverse impacts" on land use (land tenure) and environmental justice with the retention of any lands at Kahuku, Poamoho, and Mākua. The Mākua, Poamoho, and Kahuku sites are home to dozens of endangered native organisms and Hawaiian cultural and historical sites. The US military has not been good caretakers of our natural resources, lands, and water (e.g. Red Hill fuel spill).

Furthermore, they have been responsible for the desecration of ancient Hawaiian sites and burials., There hasn't been full disclosure of US Army activities on leased lands and adjacent federal lands nor an analysis of long term effects of limiting cultural access in Mākua, Poamoho, and Kahuku.

The Draft EIS fails to acknowledge the greatest and most imminent threat to the security of the U.S. and the planet - the climate crisis - which will only be exacerbated by the status quo priorities the Army is pursuing under its training programs.

The US Army only paid \$1 for 65 year leases. It is not in the best interest of our island home and residents to allow the US Army to retain these lands. Every acre should be returned to the rightful owners including those families who were removed by force.

## E-2.11 Form Letter D Response

Please see General Response.

**Section 3.3, Biological Resources; Section 3.4, Historic and Cultural Resources; Section 3.10, Water Resources; Appendix H: Biological Resources information:** Section 3.3 and Volume III Appendix H in the EIS discuss and analyze impacts on native and protected species.

Section 3.4 discusses and analyzes impacts on historic and cultural resources.

Section 3.10.5.1 has been revised with Army plans that are implemented to address potential impacts and reference to other sections where these plans are discussed. Sections 3.10.5.1 and 3.10.5.3 also discuss Army involvement in watershed management groups.

**Section 1.1, Introduction; Section 3.4, Historic and Cultural Resources; Section 3.5, Cultural Practices; Section 3.6, Hazardous Substances and Hazardous Wastes; Section 3.12, Environmental Justice; Appendix F: NEPA and other Environmental Planning Documents and Existing Management Measures:**

The Army recognizes that past training activities have impacted cultural resources. Impacts are largely from live-fire training, which ceased in 2004. Live-fire training no longer occurs at MMR, and has not been used at KTA nor Poamoho. Section 3.6.5 and Appendix F describe existing management measures to manage risks from hazardous materials and hazardous wastes, including training, management and SOPs for storage, handling, and site cleanup and restoration. Section 3.4.5 of the EIS provides a discussion of impacts from training activities.

Section 1.1.2 of the EIS describes military activities on State-owned lands. Military activities on Federal lands are outside the scope of this EIS. An analysis of impacts to cultural practices from past, present, and reasonably foreseeable future actions is discussed in Section 3.5.6. Sections 3.4, 3.5, and 3.12 of the EIS disclose impacts on historic and cultural resources, and on access associated with cultural practices.

**Section 3.7, Air Quality and Greenhouse Gases:** Greenhouse gas emissions and the potential impacts of the Proposed Action may have on climate change are discussed in Section 3.7.

**Section 2.3, Alternatives Considered; Section 3.1, Introduction; Section 3.2, Land Use; Section 3.12, Environmental Justice; Appendix G: Land Retention Estate Assumptions:** The land tenure impacts in Land Use and Environmental Justice (Sections 3.2 and 3.12 of the EIS respectively) acknowledge the lease price for the current leases. The Final EIS has been revised in Sections 2.3, 3.1.3, and Appendix G 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.

## E-2.12 Form Letter D: List of Submittals

Marissa Abadir	Shardan Amper	Kamea Blackman
Ayah Abdo	Consuelo Apolo-Gonsalves	Jenny Blake
Nathan Abril	Isa Arriola	Sarah Blichfeldt
Cathy Young Ahia	Faith Aurello	Margaret blume
Clement Ahia	Travis Bachman	Honour Booth
Mahealani Ahia	Kalani Baer	Nora Bower
Tanya Alana	Stacy Hokulani Baumann	Melissa Bowman
Lana Albright	Jannah beale	Kathryn Bradford
Rosanna Alegado	John Beale	Kaylee Braun
Kaya Allan	Kā’eoikaika Beale	Daniel Kamakahukilani Brown
Katarina Allison	Kalani Beale	Makan Brun
Kauilani Almeida	Any Benavides	Mason Bukoski
Imani Altemus-Williams	Lana Bilbo	Laameaomaunaala Burgess

Liko Cabanting  
Dirk Campbell  
Amber Canty  
Olivia Carbi  
Anahi Carrera  
Daria Cassese  
Mahina Chillingworth  
Jordan Cho  
Doni Chong  
Patti Choy  
Hayden Clifton  
Katherine Crowell  
Jonah Cummings  
Roslyn Cummings  
Roslyn Cummings  
Mindy Daugherty  
Ilima DeCosta  
Richelle Dietz  
Laurie Dunn  
Adrian Escribano  
Danielle Espiritu  
Kimiyo Fardy  
Leiolani Fautot  
Victoria Feliciano  
MaryAnn Ferreira  
Kristen Ferrer  
kapulei flores  
Monaeka Flores  
Faye Fukuyama  
Hana Fulghum  
Keala Fung  
Victoria Gacutan  
Mary Lawrence Gallagher  
Marcia Garcia  
Jadie Geil  
Maria Gentles  
Delores Glover  
Kelvin Gonsalves  
Ashley Guerrero  
Kenneth Guillen  
Robin HakuoliChing  
Collin Ham  
Joseph Han  
Isabella Hashimoto  
Rebecca Haynes  
Joan Heller  
Chloe Helling

Michael Hikalea  
Delphine Homerowski  
Lorelei Hoopii  
Kimmer Horsen  
Cheryl Hotta  
Annelise Houston  
Alexandria Huetter  
M. Hutchinson  
Ami Hyten  
Kelsey Ige  
Braxton Igne  
Marissa Ing  
Pi'ikea Jack  
Alia Jeraj  
Harry Johnson  
Jessica Johnson  
Kahala Johnson  
Keahi Johnson  
Koa Johnson  
Kule'a Johnson  
Laura Johnson  
Karyn Jones  
Lopaka Jose-Matias  
Andrea June  
Tony Van K  
Dion'e K. Ka'eo  
Hiwahiwa Kaheaku  
Shareen Kaheaku  
Celena Kahealani  
Sophie Kahn  
Tēvita Ka'ili  
Debralee Kailiwai-Ray  
Gayle Kaio  
Starr Kalahiki  
Kalikoonāmaukūpuna  
Kalāhiki  
Merrill Kalopodes  
Kimberly Kalua  
Larry Kamai  
Carol Lee Kamekona  
Tracey Kamekona  
Christy Kaolulo  
Kau'i Kaolulo  
Kehau Kapua'a  
Hinaikawaihiilei Keala  
Kekulalani Keaulii  
Louisa Keawe

Mokihana Keli'iheleua  
Keala Keo  
Autumn Kesterson  
Antoine Khalil  
Nikhil Khurana  
Hannah King  
Sandi King  
Valerie King-Alconcel  
Tatsuki Kohatsu  
Austin Koonce  
Erin Kramer  
Kalehua Krug  
Sunnie Kupahu  
Pua Kwan  
Luella Lake  
Maelani Lee  
Luwella Leonardi  
Harlem Lima-Naki  
Ryan Vande Linde  
Ekini Lindsey  
Karina Liu  
Raynette Lopez  
John Lopez Jr  
Mapuana lukela  
Lily lum  
Rosalie Luo  
Renson Madarang  
Marjie Maertens  
Pi'ilani Mahoney  
Shannon Maldonado  
Logan Malterre  
Adam K. Manalo-Camp  
Simone Manganelli  
Miles Manipon  
Natalie Star Mansfield  
Malia Marquez  
Michele Mateo  
Edonna McBride  
Roberto McClellan  
Catherine Mcgee  
Sarah McIntosh  
Jeannie Mendiola  
Kapuaonaona Mersberg  
Naomi Mersberg  
Scott Miller  
Kailana Moa-eli  
Nathanial Montalbo

Ka'ūhanelani Mossman	Tatum Quinn	Mililani B Trask
Rosa Motta	Elizabeth Rago	Kalaeolaa Trask-Sharpe
Brent Nagami	Marie Ramos	Grace Tsubaki-Noguchi
Uma Nagendra	Kula Raquedan	Kathleen Tsui
Jordan Nakamura	Michael Razon	Nikki van der tol
Laurel Nakanishi	Marietta Rea	Royce Vee
Nalani Napoleon-Martins	Carmela Resuma	Shaolin Kuupuaalaonaona
Caihe Nemuko	Jordan Richardson	Mahina Villaflor
Angelica Ng	Alejandra Rivas	Christine Villaflor
Tam Nguyen	Jade Rivera	J. Vincent
Tran Nguyen	Kaleimaile Robia	Purdyka Wahilani
Kalamaoka'aina Niheu	Kyle Robinson	Jacquelin Wahinepio
Lei Niheu	Richard Rothschiller	Lynn Walther
Summer Noland	Alyssandra Rousseve	Zara Walton
Lala Nuss	Marie Rozelle	Jolie Wanger
Suzanne Ofahengaue	Shannon Rudolph	Constance Keoahunui Uale
Miki Ohashi	Laura Safranski	Warrington
Kaitlin Oki	Katherine Salzman	Haylee Watson
Cinzia Olter	Travis Sasaki	KILINAHEOKALANI Watson
Nani Omerod	Karyl Scharhag	Ash west
Donna Ortiz	Benjamin Daniel Shafer	Brandon West
Mialisa Otis	Kaylene Sheldon	R WHITFORD
Kiana Otsuka	Janice Tona Shiira	Areerat Worawongwasu
Koanui Pa'ahana-Leslie	Nicole Shintani	Deborah WRd
Lena Pahia	Kasey Smith	Krystle Yanagihara
Mary Nālahuala Pale	Miya Sommers	Tim Yee
Amy Parsons	Wren Soperanes	Reiki Kahikina M. Young
'Atalina Pasi	Lena Stevens-Ng	Skylar Young
Ariel Patterson	Wailani Stoner	Nancy zagha
Kaleo Patterson	Liysa Swart	Christian Zavala
Pure Pepel	Mahelani Sylva	Kamai
Nani Peterson	Naya Tadaki	Mara
Heidi Pihana	Verna Takashima	MKP UCSB
Ke'ala Pitoy	Quiera Thomas	Our Common Wealth 670
David Prais	Steven Thomas	Rhonda
Rusty Pundyke	Sally Thrasher	Scott
George Pupuhi	Anthony Torres	
Xandria Quichocho	Damien Trask	

## **E-2.13 Form Letter E**

Testimony Opposing the Army's Draft Environmental Impact Statement to Retain 6,322 Acres of Hawaiian Kingdom Lands at Makua, Poamoho, and Kahuku in Oahu, Hawaii

To Whom It May Concern,

I am writing to voice my strong opposition to the Army's Draft Environmental Impact Statement (DEIS) concerning the retention of 6,322 acres of Hawaiian Kingdom lands at Makua, Poamoho, and Kahuku in Oahu, Hawaii. The DEIS fails to address the historical injustices, ongoing environmental degradation, and cultural violations that continued military control of these lands would perpetuate.

### Historical and Legal Concerns

The lands in question were originally part of the Hawaiian Kingdom and were unlawfully taken during the overthrow of the Hawaiian monarchy. This historical context is critical and must be acknowledged. The retention of these lands by the Army represents a continuation of the illegal occupation and exploitation of Hawaiian lands. The DEIS fails to consider the legal and moral implications of retaining lands that were never ceded willingly by the Hawaiian people. Restitution and return of these lands to their rightful owners, the Native Hawaiian people, should be a priority. The DEIS should include a comprehensive examination of the historical context and provide a framework for returning these lands to Hawaiian stewardship.

### Environmental Impact

Makua, Poamoho, and Kahuku are areas of immense ecological importance, hosting unique and endangered species found nowhere else on Earth. The Army's use of these lands for military exercises has already caused significant environmental damage, including contamination from unexploded ordnance, destruction of native habitats, and increased wildfire risks. The DEIS inadequately addresses the cumulative environmental impacts of continued military activities and fails to provide a robust plan for restoration and mitigation. Preserving these areas' natural integrity is vital for the survival of endemic species and the overall health of Oahu's ecosystems. The Army must relinquish control of these lands to allow for their restoration and protection under responsible and sustainable management.

### Cultural and Spiritual Significance

Makua Valley, in particular, is a site of profound cultural and spiritual importance to Native Hawaiians. It contains numerous sacred sites, including heiau (temples) and burial grounds, that have been desecrated by military activities. The DEIS fails to adequately protect these cultural resources and disregards the cultural rights of Native Hawaiians. Continued military control and use of these lands would perpetuate the cultural genocide initiated during the illegal overthrow of the Hawaiian Kingdom. It is imperative that the Army recognizes and respects the cultural significance of these lands to Native Hawaiians. Returning these lands to Native Hawaiian stewardship would honor and preserve their cultural heritage, allowing for the continuation of traditional practices and the protection of sacred sites.

## Social and Economic Impacts

The social and economic well-being of local communities is also at stake. The presence of military installations and activities disrupts the daily lives of residents, affecting their health, safety, and quality of life. Moreover, the tourism industry, which is vital to Oahu's economy, is jeopardized by the environmental and cultural degradation caused by military activities. The DEIS does not adequately address these social and economic impacts. A comprehensive evaluation of the benefits of returning these lands to the Hawaiian people, including potential economic revitalization through eco-tourism and cultural tourism, should be conducted.

## Conclusion

In conclusion, the Army's retention of 6,322 acres of Hawaiian Kingdom lands at Makua, Poamoho, and Kahuku is unjust and unsustainable. The DEIS fails to address the historical, environmental, cultural, and social impacts of continued military control. I strongly urge the Army to withdraw the current DEIS and instead develop a plan to return these lands to Native Hawaiian stewardship. The restoration of these lands to their rightful owners is not only a matter of justice but also essential for the preservation of Hawaii's unique environment and cultural heritage. It is time for the Army to acknowledge the historical wrongs and take meaningful steps toward restitution and healing. Thank you for considering my testimony. Sincerely,

## E-2.14 Form Letter E Response

Please see General Response.

Under the No Action Alternatives, the land would be returned to the State. Whether the State would then return it to descendants of original owners is beyond the scope of this EIS.

**Chapter 3, Affected Environment and Environmental Consequences; Section 3.2, Land Use; Section 3.4, Historic and Cultural Resources; 3.12, Environmental Justice:** An analysis of impacts to historic and cultural resources is presented in Section 3.4.

An analysis of impacts to other environmental resources is also presented within separate resource area sections in Chapter 3.

Cumulative impacts are discussed for each resource area throughout Chapter 3 of the EIS.

Section 3.2.5 discusses public trust lands, the events of 1893 and the Apology Resolution in 1993.

Section 3.12 Environmental Justice has been revised to further assess significant impacts on Native Hawaiians.

**Section 3.3, Biological Resources; Section 3.6, Hazardous Substances and Hazardous Wastes; Appendix J: Regulatory Framework:** Section 3.3 includes a discussion on endangered species.

Current management measures to mitigate potential impacts from hazardous substances and hazardous wastes are discussed in Section 3.6.5.



Appendix J has been revised to add the definition of operational ranges and the rule's applicability to MEC cleanup actions on the State-owned land to the description of the Military Munitions Rule.

Existing Conditions discussion in Section 3.6.5.3 provides the procedures in place at MMR for areas that contain or are likely to contain MEC. Text added to the Environmental Consequences discussion under Section 3.6.5.3 stating "as noted under Existing Conditions, following all training exercises, the Army conducts routine range management activities to ensure that no materials, including debris, trash, and brass are left behind."

**Section 3.3, Biological Resources; Appendix H, Biological Resources Information:** Sections 3.3.5.1, 3.3.5.2, and 3.3.5.3 and Volume III Appendix H in the EIS discuss, and analyze impacts on endangered, native and protected species.

**Chapter 3, Affected Environment and Environmental Consequences; Section 3.14, Human Health and Safety:** As noted in Section 3.14, the IWFMP for O'ahu installations lays out specific guidance, procedures, and protocols for the prevention and suppression of wildfires on O'ahu training areas, including KTA, Poamoho, and MMR. The IWFMP also describes the methods and procedures necessary to minimize fire frequency, severity, and size while providing military units the freedom to conduct training. These measures are implemented to preserve the land and reduce safety risks to the maximum extent practicable.

Each resource area in Chapter 3 includes an analysis of the cumulative impacts of the Proposed Action when combined with impacts from other reasonably foreseeable future actions. The ROI is determined by each resource area. Military training is discussed in the context of ongoing activities and their impacts because of land retention, and no changes in training are proposed. Ongoing training has been addressed through previous NEPA and other planning documents, which included measures to address impacts from training activities.

**Section 3.2, Land Use; Section 3.4, Historic and Cultural Resources; Section 3.5, Cultural Practices; Appendix B: Cultural Impact Assessment:** Section 3.4.5 describes existing management measures for cultural resources within Army training areas. Section 3.5.5.3 provides a summary of Native Hawaiian beliefs obtained from interviewees and survey respondents. These informants noted the sacredness of Mākuā. 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 B. The No Action Alternative for MMR is analyzed in Section 3.5.5.3.

Section 3.2.5 discusses public trust lands, the events of 1893 and the Apology Resolution in 1993.

**Section 3.11, Socioeconomics:** Sections 3.11.5.1, 3.11.5.2, and 3.11.5.3 discuss socioeconomic impacts at KTA, Poamoho, and MMR, respectively. The Army cannot predict specifically the State's course of action for land not retained by the Army, and a comprehensive evaluation of potential economic revitalization through eco-tourism and cultural tourism is beyond the scope of this EIS.

## **E-2.15 Form Letter E: List of Submittals**

Vi Girbino  
Sanae Hartmann  
Mio Kamioka

## **E-2.16 Form Letter F**

To Whom It May Concern, I am writing to express my strong opposition to the Draft Environmental Impact Statement (EIS) for Army Training Land Retention (ATLR) at Kahuku Training Area (KTA), Kawaihoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O'ahu. This testimony highlights significant environmental, cultural, and social concerns that render the proposed retention of these lands unacceptable.

### **Biological**

**Environmental Concerns** The proposed retention of these training areas poses severe risks to O'ahu's unique ecosystems and biodiversity. The KTA, Poamoho, and MMR encompass critical habitats for numerous endangered and endemic species. Continued military activities, including live-fire exercises, heavy machinery operation, and the potential for unexploded ordnance, threaten the integrity of these ecosystems.

The Draft EIS inadequately addresses the cumulative impacts of prolonged military use on native flora and fauna, soil health, and water quality. A more thorough analysis is necessary to understand the full extent of environmental degradation caused by these activities.

### **Cultural and Historical Significance**

These lands hold profound cultural and historical significance for the Native Hawaiian community. They are home to sacred sites, traditional practices, and ancestral lands that have been stewarded by Kānaka Maoli for generations. The ongoing militarization of these areas represents a continued erasure of Native Hawaiian culture and a violation of their rights to access and preserve their heritage. The Draft EIS fails to meaningfully engage with the cultural impacts of land retention and the desecration of sacred sites, which undermines the integrity of the environmental review process.

### **Social and Health Impacts**

The retention of military training areas has adverse social and health implications for local communities. Residents living near KTA, Poamoho, and MMR are subjected to noise pollution, air pollution, and potential exposure to hazardous materials. These conditions contribute to stress, respiratory issues, and other health problems, disproportionately affecting marginalized communities. The Draft EIS does not adequately address these human health impacts nor propose sufficient mitigation measures to protect public well-being.

## Inadequate Community Engagement

The preparation of the Draft EIS has lacked genuine community engagement and consultation with Native Hawaiian organizations, local residents, and environmental groups. Meaningful input from these stakeholders is essential to ensure that their voices are heard and their concerns are addressed. The failure to incorporate comprehensive community feedback undermines the credibility of the EIS process and raises questions about its legitimacy.

Given the significant environmental, cultural, and social concerns outlined above, I urge the Army to reconsider the proposed retention of the Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Makua Military Reservation. The Draft EIS must be revised to incorporate a more thorough and inclusive analysis of the impacts on O'ahu's ecosystems, cultural heritage, and community health. The protection of these lands for future generations necessitates a commitment to environmental stewardship, cultural respect, and social justice.

## E-2.17 Form Letter F Response

Each resource area in Chapter 3 addresses cumulative impacts of the Proposed Action when combined with impacts from other reasonably foreseeable actions. The EIS only addresses impacts resulting from the Proposed Action (retention of State-owned lands) and does not address impacts unrelated to the Proposed Action.

**Section 3.4, Historic and Cultural Resources; Section 3.5, Cultural Practices; Section 3.12, Environmental Justice:** The EIS includes a No Action Alternative under which the State-owned lands would be returned 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 3.12.6. Sections 3.4 and 3.5 discuss impacts on historic and cultural resources, and on access associated with cultural practices.

**Section 3.6, Hazardous Substances and Hazardous Wastes; 3.7, Air Quality and Greenhouse Gases; 3.8, Noise; 3.14, Human Health and Safety; Appendix J: Regulatory Framework:** Human health and safety is discussed in Section 3.14, and mitigation measures to protect human health and safety are provided in Appendix J.

Impacts from noise pollution, air pollution, and hazardous substances and wastes, along with mitigation measures, are analyzed in Sections 3.7, 3.8, and 3.6, respectively.

**Section 1.5, Public Involvement; Appendix B: Cultural Impact Assessment; Appendix L: Additional Public Engagement Efforts:** Section 2.2.1 of the CIA details the 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. These included: 1) a publication in the Office of Hawaiian Affairs Ka Wai Ola in October 2021; 2) social media posts on Facebook and Instagram; and 3) direct outreach to specific organizations and individuals, as shown in Appendix A of the CIA.

The EIS has included public engagement from an early stage for consultation during the scoping of the EIS, and met the statutory requirement for public review of the Draft EIS. The Army has held more public meetings than required by NEPA and HEPA, and allowed additional time to what was originally allotted for

the testimonies and public meetings to accommodate the strong public sentiment related to the Proposed Action. Section 1.5 has been revised accordingly, and an Appendix L, Additional Public Engagement Efforts, has been added.

**Section 3.3, Biological Resources; 3.6, Hazardous Substances and Hazardous Wastes; Appendix F: NEPA and other Environmental Planning Documents and Existing Management Measures; Appendix J: Regulatory Framework:** Section 3.3 includes a discussion on endangered and endemic species and critical habitat as well as mitigation measures for potential impacts.

Section 3.6.1 and Appendix J have been revised to add the definition of operational ranges. Current management measures to mitigate potential impacts from hazardous substances and hazardous wastes are discussed in Section 3.6.5.

Volume II Appendix F provides best management practices, standard operating procedures, mitigation measures, and management measures.

## **E-2.18 Form Letter F: List of Submittals**

Stacey Alapai  
Emma Lake  
Nanea Lo  
Kaleiheana Stormcrow

Commenter	Submitted By	Comment	Response
Janet Whitlock	US Department of the Interior	<p>The DEIS also presents and analyzes impacts of lease compliance actions, described as those actions conducted following expiration of the current lease and in accordance with the lease or otherwise negotiated with the State, to the extent feasible, within State-owned land not retained. The lease compliance actions are not part of the proposed action but would be triggered by expiration of the current lease for the State-owned land not retained under the various alternatives. As such, these lease compliance actions are considered connected actions under NEPA (40 C.F.R. 1508.25(a)(1)). The Department recognizes the importance of the Army’s Oahu training areas in meeting military mission readiness needs in support of our national defense.</p>	<p>Please see General Response.</p>
Janet Whitlock	US Department of the Interior	<p>General Comments <i>ESA Section 7 Compliance</i> Section 7(a)(1) of the ESA directs Federal agencies to carry out programs within their authorities to advance the recovery of endangered and threatened species. The Department strongly encourages the Army to continue to work with the Service to conserve endangered and threatened species on all lands under its jurisdiction (State-owned land retained and U.S. Government-Controlled land). Impacts of the Army’s ongoing activities on endangered and threatened species and designated critical habitat are addressed by existing consultations in accordance with section 7(a)(2) of the ESA. 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 that the Army consider re-initiation of consultation in accordance with section 7(a)(2) 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 endangered and threatened species and their habitats as a result of the outcome of the proposed land retention action. We also acknowledge that the Army is currently preparing a draft Programmatic Biological Assessment which will address ongoing</p>	<p>The EIS does not propose any new, or changes to existing, training activities. 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. This draft programmatic Biological Assessment, and the subsequent Section 7 consultation process, is not a part of this EIS process.</p>

Commenter	Submitted By	Comment	Response
Janet Whitlock	US Department of the Interior	<p>Army activities on U.S. Government- and State-owned land on Oahu.</p> <p><i>Land Not Retained</i> 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>	<p>Section 3.6 notes that, 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 lands not retained). After the lease expires, the Army would follow applicable regulations to determine how and when the cleanup and restoration of State-owned lands not retained would occur. Access to conduct management activities for the conservation and recovery of threatened and endangered species would be taken into consideration during this process.</p> <p>The Army cannot predict how the State could manage 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 1999, 2003, 2004, 2007, and 2008 Biological Opinions.</p> <p>Section 3.3.5.3 of the EIS text states that the Army would be responsible for any biological resources mitigation requirements that the Army negotiates with USFWS and the State that require Army action in the State-owned land not retained.</p>
Janet Whitlock	US Department of the Interior	<p>Specific Comments 3.3.4 Methodology and Significance Criteria (Page 3-54) We believe 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</p>	<p>The 20 percent of species assumption was included to be consistent with the draft programmatic Biological Assessment currently being developed. The Army acknowledges that there may be cases where species are still at risk</p>

Commenter	Submitted By	Comment	Response
		<p>the distribution of protected species populations. By definition, endangered species are at risk of extinction. A number of endangered species within areas affected by the actions of the U.S. Army Garrison Hawaii on Oahu, 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 action area, significant adverse impacts would occur in the event of a loss of individuals or reduction in distribution.</p>	<p>below a 20 percent threshold, and provide management actions. The 20 percent threshold was set for the draft programmatic Biological Assessment to identify species that need additional species-specific conservation measures as noted in Section 3.3.4.</p>
Janet Whitlock	US Department of the Interior	<p>3.3.5.1 Existing Conditions and Environmental Consequences – Kahuku Training Area - Invasive Species Management (Page 3-58) The Department recommends including updated information on the distribution of <i>Chromolaena odorata</i> and current management activities for this species by the Army within parcels A-1 and A-3, in particular, the Army's decision to refocus management efforts for <i>C . odorata</i> management in KTA from the goal of eradication to limiting its spread of <i>C . odorata</i> by military training and Oahu Army Natural Resource Program staff (2023 Status Report for the Makua and Oahu Implementation Plans, p. 45). We recommend that the Army includes the current and projected management of <i>C . odorata</i> at KTA in the analysis of alternatives.</p>	<p>Section 3.3.5 has been updated with the most recently available distribution and management activities for <i>Chromolaena odorata</i>.</p>
Janet Whitlock	US Department of the Interior	<p>3.3.5.1 Existing Conditions and Environmental Consequences – Kahuku Training Area – No Action Alternative (Page 3-62) Under the No Action Alternative, the DEIS states, “The Army would need to construct new facilities and infrastructure to replace lost training features (e.g., new range roads and access gates); these actions would require time, funding, planning, and regulatory compliance (e.g., separate NEPA analysis as appropriate)”. The Department recommends analysis of the need to construct new facilities and infrastructure as a potential environmental consequence.</p>	<p>Any future infrastructure requirements, including amounts and locations, is unknown at this time and subject to negotiations with the State that would commence after the Record of Decision. Therefore, NEPA analysis cannot be completed as a part of this EIS process. The text found in Section 2.3.3.2 has been revised.</p>
Francisco Donez (Karen Vitulano)	U.S. Environmental Protection	<p>Review Summary The DEIS is primarily a disclosure document for a real estate action to be negotiated with the State of Hawaii. As such, EPA did not identify significant public health, welfare, or environmental quality</p>	<p>The Army does not conduct ongoing seafood monitoring. The Proposed Action would enable the continuation of ongoing activities on the State-owned lands and would not result in</p>

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	Agency, Region 9	<p>concerns to be addressed in the Final EIS. For your consideration, we have recommendations to enhance disclosure of impacts from training-related pollutants at Makua Military Reservation (MMR), including possible measures to manage future off-range impacts on subsistence food sources. Seafood contamination The DEIS acknowledges that training-related pollutants are migrating off-range and contaminating seafood near Mākua Beach and in the muliwai (brackish water pools near mouths of streams), posing a health risk from food that area residents rely on for subsistence (p. 3-150 - 3-152). While no live-fire training is proposed for the future at MMR, it appears there is ample unexploded ordnance and contamination in the soils on the Range that are likely to move along existing pathways[1 The most likely pathways for contaminant migration are surface water runoff during significant rainfall events and groundwater flow from the inland areas of MMR to the Pacific Ocean (p. 3-152)] into subsistence food supplies. We note that the contaminant levels in soils on the MMR were compared to Industrial Regional Screening Levels (RSLs), levels that are used to screen contaminant levels at Superfund sites. Because of the risk to residents from migration via seafood, in this case it is appropriate to compare soil contamination levels to Residential RSLs.</p>	<p>increased risk of MC contamination or migration. There are no plans to continue studies for the comparison of previous soil analyses to residential RSLs.</p> <p>Reference to the discussion on seafood contamination in the Marine Resources Studies in Section 3.6.5.3 has been added to Sections 3.5 and 3.12, Cultural Practices and Environmental Justice, respectively.</p> <p>Section 3.6.5 and Appendix F describe existing management measures to manage risks from hazardous substances and hazardous wastes, including training, management and SOPs for storage, handling, and range management activities.</p> <p>Text in the Executive Summary, Chapter 2, and Appendix G have been revised to include information on future lease conditions.</p> <p>As stated in EIS Section 3.6, "The Army has conducted several studies and determined that MC associated with source areas at MMR, including at the North Ridge, Center, and South Ridge Tracts, are not expected to migrate off range at levels that would pose an unacceptable risk to human or ecological receptors. None of the MC found in the soil were detected at concentrations greater than USEPA Region 9 industrial soil regional screening levels (RSLs)."</p> <p>The two studies concluded that "constituents identified for analysis by the settlement</p>



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			<p>agreement are not unique to military training and are found at both Makua and background locations; therefore, it was submitted that proposed military activities were anticipated to have little influence on contaminant levels in marine resources in the Makua nearshore or muliwai areas.” A previous 2005 study referenced in the 2009 MMR Training Activities EIS identified that organic compounds did not exceed residential RSLs, and text regarding such has been added to Section 3.6. The 2015 study also stated “The proposed training activities are not anticipated to pose an increased risk to area residents who rely on marine resources for subsistence”.</p>
Francisco Donez (Karen Vitulano)	U.S. Environmental Protection Agency, Region 9	<p>The DEIS documents contaminants in groundwater including low levels of dioxin and furans in several monitoring wells (p. 3-152) which are located at the range boundary or off-range (Figure 3-13). The DEIS states that the groundwater monitoring program was discontinued in 2021, and current and future assessment of potential off-site impacts to water quality due to training activities at MMR will continue to be assessed under the Operational Range Assessment (ORA) Program (p. 3-154). It is unclear how the ORA program would be used to assess future impacts; this program models munitions constituents based on the quantity used in training during the year, yet the action does not propose new munitions use. It is not clear whether any future sampling and analysis of seafood would occur; it appears that all previous sampling occurred pursuant to court orders.</p>	<p>There were two types of groundwater events, the one-time 2002-2003 hydrogeological investigation which states: "Groundwater sampling was conducted from 2002 to 2003 as part of a hydrogeologic investigation...A number of the wells have low levels of dioxin and furan compounds within USEPA’s acceptable health risk range (USAEC &amp; USACE, 2009)" and a groundwater monitoring program initiated in 2009 (and ended in 2021) to fulfill the Record of Decision which analyzed MC such as metals, explosives, and perchlorate (no pesticides).</p> <p>Section 3.6.5.3 revised to include that the Army conducts Operational Range Assessments, in accordance with DoDI 4715.14, to determine whether an MC release or substantial threat of an off-range MC release exists based on current and historical operational range use and assesses the potential risk to human health or the environment</p>

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			<p>off-range.</p> <p>Section 3.6.1 and Appendix J have been revised to add the definition of operational ranges. Current management measures to mitigate potential impacts from hazardous substances and hazardous wastes are discussed in Section 3.6.5.</p>
Francisco Donez	U.S. Environmental Protection Agency, Region 9	<p>The DEIS identifies the surrounding community as one with environmental justice concerns. However, the impacts to this community from seafood consumption were not assessed. The DEIS human health and safety discussion mentions only noise impacts, and the hazardous substances discussion incorrectly states that impacts would be limited to the MMR grounds. The assessment of impacts on cultural practices is contained in Section 3.5. It does not appear that subsistence seafood consumption was included in this evaluation. The Guide to the Implementation and Practice of the Hawaii Environmental Policy Act, states that the types of cultural practices and beliefs subject to assessment may include subsistence (p. 12), and the DEIS identifies subsistence fishing among the cultural practices mentioned by the Native Hawaiians interviewed for information on cultural resources, practices, and beliefs occurring within or associated with the MMR region of influence (p. 3-132).</p>	<p>Marine resource studies are described in detail in Section 3.6. Section 3.14.5.3 includes discussion of the health and safety associated with subsistence fishing and the consumption of fish and other marine species near Mākua Beach. Reference to the discussion on seafood contamination in the Marine Resources Studies in Section 3.6.5.3 has been added to Sections 3.5 (Cultural Practices) and 3.12 (Environmental Justice).</p>
Francisco Donez (Karen Vitulano)	U.S. Environmental Protection Agency, Region 9	<p>Recommendation: In the FEIS, we recommend the discussion of seafood contamination be revised to clearly identify the risks from subsistence seafood consumption. <u>State if any ongoing monitoring of seafood will occur under the Operational Range Assessment program or any other program.</u> Discuss soil contamination in reference to Residential instead of Industrial Regional Screening Levels (RSLs). Include the discussion of seafood contamination from ongoing offsite migration of contaminants on area residents that rely on it for subsistence, in the environmental justice analysis and in the analysis of impacts to cultural practices. In the Final EIS, <u>identify measures that could reduce the continued migration of training-related pollutants, such as addressing sources of pollution</u></p>	<p>The Army does not conduct ongoing seafood monitoring. The Proposed Action would enable the continuation of ongoing activities on the State-owned lands and would not result in increased risk of MC contamination or migration. A 2005 marine study (included as an appendix to the 2009 MMR Training Activities EIS [USAEC &amp; USACE, 2009]) found that contamination did not exceed residential RSLs. The Army does not plan to do any additional soil analyses against residential RSLs.</p>

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		<p><u>within MMR boundaries</u>. According to the Army's Operational Range Assessment program website, "When sampling data shows people or the environment around the installation could be exposed to MC (munitions constituents), the <u>Army performs mitigation to eliminate that exposure</u>. This mitigation will be part of the Army's environmental cleanup program, funded through the Defense Environmental Restoration Program." [2 <a href="https://aec.army.mil/conserve/army-operational-range-assessment-program-orap">https://aec.army.mil/conserve/army-operational-range-assessment-program-orap</a>] This mitigation could be included in lease conditions should that land retention method be selected.</p>	<p>Reference to the discussion on seafood contamination in the Marine Resources Studies in Section 3.6.5.3 has been added to Sections 3.5 (Cultural Practices) and 3.12 (Environmental Justice).</p> <p>Mitigation measures to reduce migration of hazardous substances and hazardous wastes are discussed in Section 3.6.5.</p> <p>Future lease conditions text in the Executive Summary, Chapter 2, and Appendix G has been revised to note that future lease conditions:</p> <ul style="list-style-type: none"> <li>* Would be similar to the current lease.</li> <li>* May include references to Federal and State regulations in existence at the time of a new lease.</li> <li>* May be revised or added by the State in a new lease, but that the EIS cannot precisely analyze potential impacts because those lease conditions are unknown.</li> </ul>
Mary Alice Evans	State DBEDT, Office of Planning and Sustainable Development	<p>Thank you for the opportunity to provide comments for the Draft Environmental Impact Statement (DEIS) on the Army Training Land Retention (ATLR) study of State-owned lands at the Kahuku Training Area (KTA), Kawaihoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR). These collectively are referred to as the ALTR-O'ahu land retention study. It is our understanding that the U.S. Army proposes to retain up to approximately 6,322 acres of State-owned lands on O'ahu based training sites in support of military readiness training. It is stated that the Army will arrange for retention and continued use of the State-owned lands prior to the expiration of the 1964 leases to ensure uninterrupted training of KTA, Poamoho, and MMR. Following the decision on the retention of these military training lands, the Army will continue with ongoing readiness training; operational use of the existing</p>	<p>A note has been added in this section that the CZM Federal consistency determination has been initiated and is anticipated to be completed prior to the ROD. Table 4-4 has been added to this section to evaluate the Proposed Action against HRS 205A-2 policies.</p>

Commenter	Submitted By	Comment	Response
		<p>facilities, as well as infrastructure maintenance and repair. Additionally, the retention of the State-owned lands, will involve resource management and stewardship obligations. The Office of Planning and Sustainable Development (OPSD) has reviewed the submitted material and has the following comments to offer: Issues of Programmatic Concern</p> <p>We acknowledge that the DEIS addresses many of the issues that are of programmatic concern for our office as listed in our previous comment letter: DTS 202107271316HE, dated August 31, 2021. These include: Hawai’i Revised Statutes (HRS) Chapter 205 (State Land Use Laws) and the need for a Special Permit from the Land Use Commission; HRS Chapter 226 (the Hawai’i State Planning Act); as well as assesses environmental issues of importance to our office surface water resources, water quality, and erosion controls. 2. Coastal Zone Management Act (CZMA), Federal Consistency We note that Section 4.3, page 4-11 states "the Army has initiated the requirement for a CZM consistency determination through coordination with the State. This process of engagement will continue after the publication of the EIS, and with input provided during the public comment and review process." This land retention action is subject to CZMA Federal Consistency as found in Title 15 Code of Federal Regulations (CFR) Part 930 Subpart C--Consistency for Federal Agencies. 3. The Hawai’i Coastal Zone Management Program The DEIS does not include an evaluation of HRS §205A-2, the objectives and supporting policies of the Hawai’i CZM Program. HRS §205A-2 serves as the foundation of the enforceable policies of the State of Hawai’i of which the CZMA federal consistency review is based upon. The Final Environmental Impact Statement should include an evaluation of this statute and its provisions. This assessment can be used as support material for the federal consistency review. Additionally, disclosure of impacts on CZM objectives and supporting policies will aid the State in determining impacts to the project area and to the coastal regions of the island of O’ahu. The provisions of HRS §205A-2 (which align with the enforceable policies) include Recreational Resources, Historic</p>	

Commenter	Submitted By	Comment	Response
		Resources, Scenic and Open Space Resources, Coastal Ecosystem, Economic Uses, Coastal Hazards, Managing Development, Public Participation, Beach Protection, and Marine Resources. For any questions regarding this comment letter, please contact Joshua Hekeka at [REDACTED] or by email to [REDACTED]. If you wish to respond to this comment letter, please include DTS202406120719DO in the subject line. Sincerely, Mary Alice Evans, Director	
Jenna Oshiro	Hawai’i State Department of Health, Hazard Evaluation and Emergency Response Office	1. If a new lease is granted, ensure that it includes sufficient time to conduct a thorough evaluation and cleanup of munitions hazards at the sites. Cleanup of former munitions sites under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) process required by Department of Defense 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, as the Military Munitions Rule only applies to active range areas and does not cover the entire MMR property. Therefore, potential historic maneuver and impact areas no longer being used should be excluded from the Military Munitions Rule and assessment and clean-up of these areas and any other areas within the State-owned lands that are not being utilized should be conducted prior to the end of the lease.	Section 3.6.1 and Appendix J have been revised to add the definition of operational ranges. Current management measures to mitigate potential impacts from hazardous substances and hazardous wastes are discussed in Section 3.6.5.  Existing Conditions discussion in Section 3.6.5.3 provides the procedures in place at MMR for areas that contain or are likely to contain MEC. Text added to the Environmental Consequences discussion under Section 3.6.5.3 states that the Army conducts range management activities to ensure that no materials, including debris, trash, and brass are left behind.  Lease compliance actions and cleanup and restoration activities that would occur upon lease expiration are discussed in Section 4.2.4.
Jenna Oshiro	Hawai’i State Department of Health, Hazard Evaluation and Emergency Response Office	2. In the event that the lease is extended or a new lease is a granted, the HEER Office recommends that a requirement be included in the lease to conduct ongoing unexploded ordnance (UXO) investigations and clean up during the lease period and a final UXO cleanup prior to return of the land to the State or to restrict future activities in maneuver areas on State land such that munitions use is not allowed.	Section 3.6.1 and Appendix J have been revised to add the definition of operational ranges. Current management measures to mitigate potential impacts from hazardous substances and hazardous wastes are discussed in Section 3.6.5.  Lease compliance actions and cleanup and

Commenter	Submitted By	Comment	Response
			restoration activities that would occur upon lease expiration are discussed in Section 4.2.4.
Jenna Oshiro	Hawai’i State Department of Health, Hazard Evaluation and Emergency Response Office	3. A copy of the Environmental Condition of Property (ECOP) has not been provided to the HEER Office. Please make a copy of the ECOP available to the public and to the HEER Office for review and comment, along with other relevant site documents. Include the information for the ECOP in the references, Chapter 5.	The Army has provided a copy of the ECOP to the HEER Office as requested.
Jenna Oshiro	Hawai’i State Department of Health, Hazard Evaluation and Emergency Response Office	Specific Comments: 1. Section 2.1 (p. 2-2) states the following: "...it is assumed that the Army would be held to new lease conditions that are the same as or similar to the existing lease conditions..." which is also mentioned in Section 4.2.2 (p. 4-2). Given that most current state and federal environmental regulations did not exist at the time that the first lease agreement was drafted, why would this assumption be made? Any new lease agreement should address management of potential contamination of the properties and requirements to cleanup areas previously contaminated	Future lease conditions text in the Executive Summary, Chapter 2, and Appendix G has been revised to note that future lease conditions: * Would be similar to the current lease. * May include references to Federal and State regulations in existence at the time of a new lease. * May be revised or added by the State in a new lease, but that the EIS cannot precisely analyze potential impacts because those lease conditions are unknown.
Jenna Oshiro	Hawai’i State Department of Health, Hazard Evaluation and Emergency Response Office	2. Section 2.2 indicates that much of the State-owned lands are or were previously utilized for maneuver areas with Section 3.6.5.3 (page [p.] 3-154) stating the following for MMR: “The State-owned land at MMR consists of approximately 782 acres, of which 722 acres have been under Army control since 1943 and subject to past bombing, shelling, and small arms firing” and “from the 1920s to 2004, MMR was used for small arms and artillery firing, helicopter gunnery practice and maneuvers, tactical live-fire training exercises, and ground training of military troops.” The DEIS identified the following areas at MMR where munitions may have been used in the past that potentially overlap with the State-owned land: • Section 2.2.4.1 (p. 2-15) indicates that a portion of the State-owned lands are located within the boundary of the Company Combined Arms Assault Course (CCAAC) which was used for both live-fire and non-live fire maneuver training exercises. • Buffalo Objective which was previously used as a vital maneuver land (p. 2-16). • The	Section 3.6.5 discusses the potential for MEC to be found within the ROI.

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		<p>southern firebreak loop where there were dedicated impact areas and potential UXOs. The DEIS indicates that these areas were previously used for training and have not been surveyed or cleared for munitions and explosives of concern (MEC), therefore there are designated high hazard areas that are avoided for ongoing training (p. 2-20). • Section 3.6.5.3 (p. 3-155) indicates that UXO are occasionally encountered at MMR. Additionally, HDOH has been made aware that munitions debris (MD) has been found in the former Beach Assault Training Area (BATA), located adjacent to the State-owned land at MMR, thus, it is possible that MEC is present within the State-owned lands at MMR despite previous removal actions in the area.</p>	
Jenna Oshiro	Hawai‘i State Department of Health, Hazard Evaluation and Emergency Response Office	<p>Although Section 2.1 (p. 2-3) states that the Army would conduct cleanup and restoration after the lease expires for any State-owned lands not retained, the HEER Office recommends that the above mentioned maneuver and impact areas be investigated for munitions use, including munitions constituents (MC), prior to the end of the lease and remediated as necessary, as the Military Munitions Rule only applies to active range areas and does not cover the entire MMR property (see Comment #1)</p>	<p>Section 3.6.1 and Appendix J have been revised to add the definition of operational ranges. Current management measures to mitigate potential impacts from hazardous substances and hazardous wastes are discussed in Section 3.6.5.</p> <p>Section 3.6.5.3 states that the Army would follow applicable regulations to conduct cleanup and restoration activities for any potential MEC on any State-owned land not retained at the end of the current lease. Section 3.6.5.3 also provides information on current and past range management activities regarding MEC within the State-owned land.</p> <p>The Army would coordinate cleanup and restoration activities with the State of Hawai‘i throughout the CERCLA process.</p>
Jenna Oshiro	Hawai‘i State Department of Health, Hazard Evaluation and	<p>3. Please clarify in Section 2.6.3 and elsewhere in the document (e.g., Section 3.6.5.3) that in the event of Alternative 2: Modified Retention, Alternative 3: Minimum Retention, and No Action Alternative, the Army would retain responsibility for ongoing management of any contaminated sites on the State-owned land</p>	<p>Section 3.6.5 states that the Army retains responsibility for cleanup of closed ranges (i.e., State-owned lands not retained). Text has been added that this is pending an agreement with the State allowing the Army access for necessary</p>

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	Emergency Response Office	and an agreement will be required to allow the Army access for necessary inspection and maintenance of the controls at the sites	inspection and management of any contaminated sites.
Jenna Oshiro	Hawai’i State Department of Health, Hazard Evaluation and Emergency Response Office	4. Section 3.6.5.3 (p. 3-155) states the following for MMR: "When suspected UXO is found in a training area, it is reported to Range Control, and the explosive ordnance disposal (EOD) team investigates to identify the item and determine whether it is hazardous, can be removed, or must be destroyed in place. If destroyed in place, any remnants are removed following destruction (USAG-HI, 2018a)." Please discuss how many and what types of UXO have been identified outside of the current training areas 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>All State-owned land at MMR is considered an operational range; therefore, a full MEC assessment has not been performed.</p> <p>Section 3.6.1 and Appendix J have been revised to add the definition of operational ranges. Current management measures to mitigate potential impacts from hazardous substances and hazardous wastes are discussed in Section 3.6.5.</p> <p>Existing Conditions discussion in Section 3.6.5.3 provides the procedures in place at MMR for areas that contain or are likely to contain MEC. Text added to the Environmental Consequences discussion under Section 3.6.5.3 states that the Army conducts management activities to ensure that no materials, including debris, trash, and brass are left behind.</p> <p>Lease compliance actions and cleanup and restoration activities that would occur upon lease expiration are discussed in Section 4.2.4.</p>
Jenna Oshiro	Hawai’i State Department of Health, Hazard Evaluation and Emergency Response Office	5. HDOH recommends re-evaluating the cumulative impacts discussed in Section 3.6.6.4 (p. 3-159), especially regarding the past use of munitions at MMR. The proceeding sections state that portions of MMR are no longer usable to the Army, such as the area mentioned in Section 2.2.4.2 (p. 2-20) which states the 64-acre improved convention munitions (ICM) Area/ICM Buffer Area and Open Burn/Open Detonation Areas as the following: “historically used for training and have not been surveyed or cleared of MEC, they are designated high hazard arrest hat must be avoided by ongoing training.” Additionally, the former BATA that is within the U.S. Government-Controlled Land has undergone MEC removal	The BATA is on Army-owned land and consideration of it is outside the scope of this EIS. The Proposed Action addressed in this administrative EIS is a real estate transaction (land retention). Military training is discussed only in the context of ongoing activities and their impacts because of land retention, and no changes in training are proposed. Ongoing training has been addressed through previous NEPA and other planning documents, which included measures to address impacts from training activities.



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		<p>actions but ongoing land use controls (LUCs) were determined necessary to protect the public and are not being properly implemented by the Army. Cumulative impacts at MMR cannot be considered short-term nor minor, as stated in Section 3.6.6.4. The cumulative effects of the past use of land by the military has resulted in unusable lands and ongoing long-term monitoring, which would continue if these State-owned lands were retained and must be better analyzed and considered in the DEIS.</p>	<p>Sections 3.6.5.1, 3.6.5.2, and 3.6.5.3 describe the management of hazardous substances and hazardous wastes at KTA, Poamoho, and MMR, respectively.</p> <p>As stated in Section 3.1.5.3 the actions considered for past, present, and reasonably foreseeable actions include those planned by non-Federal agencies. Cumulative Impacts of past activities for the use, storage, generation, handling, and disposal of hazardous substances and hazardous wastes and from current training operations and MEC from past training operations at KTA, Poamoho, and MMR were taken in account as discussed in Section 3.6.5.</p>
<p>Ryan K. P. Kanaka’ole (Russell Y. Tsuji - Land Division)</p>	<p>State of Hawai’i Department of Land and Natural Resources</p>	<p>[Land Division] SUBJECT: Comments on the Draft Environmental Impact Statement for Army Training Land Retention of State Lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Makua Military Reservation Located on the Island of O’ahu Tax Map Keys (TMKs): (1) 5-8-002:002; 5-9-006:026; 7-2-001:006; 6-9-003:001 (por.); 8"001:008 and portions of 007 &amp; 012; and 8-2-001:001, 022, 024, 025, and portions of 002 Thank you for the opportunity to review the subject document. The Land Division offers the following comments. After review of the document, the Land Division finds that the document, as currently written, does not meet the requirements of Hawai’i Revised Statutes (HRS) Chapter 343 and Hawai’i Administrative Rules (HAR) Chapter 11-200.1. 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 version and the Draft EIS would need to be republished to provide further public review and comment. Please be aware, should the Applicant choose to move forward with a Final EIS and not correct the deficiencies, the Department will recommend denial of the acceptance of the Final</p>	<p>Not all referenced documents are included as appendices. Links to the publicly available referenced documents have been added to the O’ahu ATR EIS website (<a href="https://home.army.mil/hawaii/OahuEIS/project-home">https://home.army.mil/hawaii/OahuEIS/project-home</a>) under the “Documents” tab.</p> <p>To request other documents, 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>

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		<p>EIS before the Board of Land and Natural Resources. The deficiencies are as follows: · 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.. ” 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 minimal environmental impacts as well as appropriate management practices/mitigation measures currently in practice should be reproduced and included in the appendices in their entirety. Further, there appears to be no current comprehensive studies or surveys prepared (i.e. technical data) for the State lands, in support of this EIS, that would assist us, other agencies, and the public in evaluating potential environmental impacts to existing resources.</p>	
<p>Ryan K. P. Kanaka’ole (Russell Y. Tsuji - Land Division)</p>	<p>State of Hawai’i Department of Land and Natural Resources</p>	<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) .” Along the same lines of the above comment, the description of the environmental setting should have been supported by current comprehensive studies and surveys that covered the entirety of the State-owned lands that are proposed to be leased. Rather, it appears that the U.S. Army Garrison-Hawaii (USAG-HI) and their consultants have relied on previous studies that have been piecemealed together in an attempt to provide a comprehensive overview of the environmental setting. However, the information is insufficient resulting in what we would consider to be major data gaps. For example, when discussing the biological resources at all three training sites, the discussion on species occurrence at the sites mainly relied on a list provided by the Pacific Island Fish and Wildlife Office (PIFWO) which the Army “ cross</p>	<p>Per NEPA and HEPA requirements, the best available data for biological species was incorporated into this EIS.</p> <p>Section 3.3.5 has been updated with the most recently available distribution for native and protected species.</p>

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		<p>referenced with biological surveys ” (that were not provided) to determine the overall presence of a species at a specific site. Staff is concerned as this methodology resulted in several listed species being described as “ not being documented on State-owned lands. ” Given that the locations of the surveys and the timeframe in which those surveys were done were not provided, Staff is not confident that we can determine the extent of certain resources on the State-owned lands, thus any conclusion made regarding impacts is questionable.</p>	
<p>Ryan K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)</p>	<p>State of Hawai‘i Department of Land and Natural Resources</p>	<p>Most concerning is that the inventory of archeological sites is incomplete. While reviewing Section 3.4 of the Draft EIS, as well as Appendix I, Staff noted that at KTA, Tract A-1 has mostly been surveyed, yet Tract A-3 is approximately half surveyed, none of Poamoho has been surveyed (see statement of page 3-104 where the Draft EIS states “ No historic or cultural resources have been identified within the ROI for Poamoho because no surveys have been conducted ), and less than half of MMR has been surveyed. No explanation was given as to why the remainder of the State-owned lands were not surveyed. 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 in turn provide meaningful mitigation measures to protect any archeological resources. This would include any ‘iwi kūpuna, which was identified in the Cultural Impact Assessment (CIA), but appears to not be addressed in the Draft EIS.</p>	<p>Section 3.4 of the Final EIS has been updated with new Figures 3-14 and 3-15 (for KTA and MMR, respectively) showing cultural resource survey coverage areas. Sections 3.4.5.1 (for KTA) and 3.4.5.3 (for MMR) have been revised to explain that the majority of State-owned lands used for ground training have been surveyed, and reasons why remaining areas are constrained. Poamoho is not used for ground training and is a heavily dissected, steeply sloping landscape. All training related activities are subject to NHPA Section 106 Compliance. The Army continues to conduct surveys as funding is made available prior to using land for training to fulfill NHPA compliance commitments.</p>
<p>Ryan K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)</p>	<p>State of Hawai‘i Department of Land and Natural Resources</p>	<p>In addition, the Cultural Impact Assessment (CIA) also appears to be lacking consultation with people from the relevant moku, specifically as it relates to MMR. 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 D-3 of the CIA, the Executive Director noted</p>	<p>A summary of information from CIA interviewees and impacts regarding cultural access at KTA and Poamoho are discussed in Sections 3.5.5.1 and 3.5.5.2, respectively.</p> <p>Appendix L, Additional Public Engagement Efforts,</p>

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		<p>that there were several key kūpuna that should have been included. We note that prior to the publication of the Draft EIS, we highly encouraged the Army to consult with the Aha Moku, and as of July 18, 2024, it would appear there has been little to no attempt on the Army’s side to request consultation. Further, Staff notes that impacts regarding cultural access at KTA and Poamoho and impacts to ‘iwi kūpuna were mentioned in the CIA, but not addressed nor acknowledged in the Draft EIS.</p>	<p>includes a summary of public involvement activities by the Army beyond the CIA and EIS process.</p> <p>Caring for ‘iwi kūpuna was mentioned as a cultural practice in the CIA, and was addressed in Section 3.4.2 of the EIS. It was not discussed specifically in the EIS because ‘iwi kūpuna and burial sites have not been confirmed to exist within the State-owned land.</p>
<p>Ryan K. P. Kanaka’ole (Russell Y. Tsuji - Land Division)</p>	<p>State of Hawai’i Department of Land and Natural Resources</p>	<p>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 regulatory 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 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>Section 3.5 of the EIS, the appended CIA (Appendix B), and the Historic and Cultural Resources Literature Review (Appendix I) 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 Hawai’i Constitution to protect Native Hawaiian Traditional and Customary Native Hawaiian Rights.</p>
<p>Ryan K. P. Kanaka’ole (Russell Y. Tsuji - Land Division)</p>	<p>State of Hawai’i Department of Land and Natural Resources</p>	<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...” Due to the lack of current studies and surveys, the Draft EIS lacks technical information sufficient to determine whether the statements made by USAG-HI and their consultants regarding impacts to the environment are valid. Using phrases such as “there have been no documented occurrences” or stating that a resource has not been</p>	<p>The EIS uses the most recent and best available data for analysis. The referenced documents in the EIS are identified in Chapter 5 and links have been added to the O’ahu ATR EIS project website (<a href="https://home.army.mil/hawaii/OahuEIS/project-home">https://home.army.mil/hawaii/OahuEIS/project-home</a>) under the "Documents" tab.</p> <p>To request other documents, the Army 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>

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		<p>observed does not negate the presence of such resource on the State-owned lands. Rather, Staff questions how USAG-HI can appropriately identify impacts if they lack a comprehensive understanding of the resources present on the properties.</p>	<p>There have been no noise studies conducted specifically on the Hawaiian hoary bat. References to additional studies have been added to Sections 3.3 and 3.8.</p>
		<p>In addition, the biological resource section claims that noise impacts to the Hawaiian hoary bat are not an issue as “it has likely become habituated to the noise of ongoing training activities.” The Draft EIS goes on to further state that “while no noise impact studies have been done on Hawaiian hoary bat, numerous studies notes that wildlife become habituated after continuous or frequent exposure.” Staff again questions the validity of such as statement as no technical data has been provided. Further, it would appear that the study referenced in conjunction with this conclusion was a noise study done for the monarch flycatcher, which is an avifauna species, not a mammalian species.</p>	<p>The EIS uses the most recent and available data for analysis. The referenced documents in the EIS are identified in Chapter 5 and links have been added to the O‘ahu ATR EIS project website (<a href="https://home.army.mil/hawaii/OahuEIS">https://home.army.mil/hawaii/OahuEIS</a>) under the "Documents" tab.</p> <p>To request other documents, the Army 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>There have been no noise studies conducted specifically on the Hawaiian hoary bat. References to additional studies that discuss wildlife responses to noise have been added to Sections 3.3.5 and 3.8.5.</p>
<p>Ryan K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)</p>	<p>State of Hawai‘i 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</p>	<p>The phasing, timing, and description of mitigation measures to address significant adverse impacts is provided in Section 3.1 of the Final EIS.</p> <p>Where applicable and to the extent feasible, discussions of BMPs and SOPs have been revised to include more detail in Appendix F.</p>

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		<p>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 the BMPs, SOPs, and management activities needs to be included and elaborated upon. For example, there are many management measures that call for a program to be established and implemented. It is not clear whether or not that measure has been implemented nor any indication of the success of such program. In addition, there is mention of monitoring efforts by the Army, but no indication of how often such monitoring takes place.</p>	
<p>Ryan K. P. Kanaka’ole (Russell Y. Tsuji - Land Division)</p>	<p>State of Hawai’i Department of Land and Natural Resources</p>	<p>Regarding the mitigation measures proposed for impacts to cultural resources, the Draft EIS only considers impacts and mitigation for access to MMR. However, the CIA interviews revealed potential impacts to cultural access for both KTA and Poamoho as well. This should be properly documented in the Draft EIS and appropriate mitigation proposed. Regarding mitigation for MMR, the mitigation proposed should be a part of USAG-HI’s actively ongoing management practices. In addition, it should be noted that a cultural access plan does not provide any guarantee that the process would not further frustrate access. 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.</p>	<p>Section 3.1 of the Final EIS has been revised to include the phasing and timing of mitigation measures.</p> <p>EIS Section 3.4 provides a summary of CIA interviewee responses as well as cultural access policies for KTA and Poamoho.</p>
<p>Ryan K. P. Kanaka’ole (Russell Y. Tsuji - Land Division)</p>	<p>State of Hawai’i Department of Land and Natural Resources</p>	<p>Regarding mitigation measures for military munitions and MECs, we would request that the Army clean up any areas not currently in use, including those areas that are under Federal control, but are State owned ceded lands.</p>	<p>Section 3.6.1 and Appendix J have been revised to add the definition of operational ranges. Current management measures to mitigate potential impacts from hazardous substances and hazardous wastes are discussed in Section 3.6.5.</p> <p>Lease compliance actions and cleanup and restoration activities which would occur upon lease expiration are discussed in Section 4.2.4.</p>

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			Cleanup of Federal lands is outside the scope of this EIS.
Ryan K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)	State of Hawai‘i 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 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 4.5 has been revised to provide a clarification of irreversible and irretrievable commitment of applicable resources.
Ryan K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)	State of Hawai‘i Department of Land and Natural Resources	<ul style="list-style-type: none"> <li>• 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 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 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.</li> </ul>	<p>Future lease conditions text in the Executive Summary, Chapter 2, and Appendix G has been revised to note that future lease conditions:</p> <ul style="list-style-type: none"> <li>* Would be similar to the current lease.</li> <li>* May include references to Federal and State regulations in existence at the time of a new lease.</li> <li>* May be revised or added by the State in a new lease, but that the EIS cannot precisely analyze potential impacts because those lease conditions are unknown.</li> </ul>
Ryan K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)	State of Hawai‘i Department of Land and Natural Resources	<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>We also offer the following general comments regarding the Draft</p>	Please see General Response.

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Ryan K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)	State of Hawai‘i Department of Land and Natural Resources	<p>EIS and the action as well as comments regarding specific sections of the document:</p> <ul style="list-style-type: none"> <li>• We find that discussions surrounding the use of the airspace over the State-owned lands are contradictory. In Section 3.1.4, page 3-6, subheading Airspace, the USAG-HI claims that the “use and management of the airspace overlying the land areas...is unrelated to land use...and airspace boundaries and designations would not change...” However, the Army is requesting to retain the Poamoho Tract under Alternative 2. The Poamoho Tract appears to be only used for low-aviation training and has not been used for ground training for at least the last decade. Further, the Draft EIS states in Section 2.2.3.1 that “There are no U.S. Government-owned or -managed assets at Poamoho.” Therefore, we ask that you clarify what the low-level aviation training involves as it would appear the land retention of Poamoho Tract (land use) is in fact related to the use of airspace. This comment also somewhat applies to the North and South Ridge Tracts for MMR as it would appear only aviation training is allowable as per the 2007 Biological Opinion and the Integrated Wildland Fire Management Plan (IWFMP). For the MMR Tracts, we request that a discussion be included regarding the type of aviation training conducted and the purpose/importance of the U.S. Government-owned or -managed infrastructure on State land to better understand the need to retain the lease for these two tracts, as well as a discussion regarding the restrictions on training.</li> </ul>	Aviation training activities at the training areas containing the State-owned lands are discussed in Section 2.2.1.5. The discussions for each training area in Section 2.2 also identify specific aviation training activities. While the No Action Alternative is now identified as the Preferred Alternative for Poamoho and MMR as stated in Section 2.5 of the Final EIS, aviation training can still occur without the continued retention of State-owned lands.
Ryan K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)	State of Hawai‘i Department of Land and Natural Resources	We also ask that you review the Office of Conservation and Coastal Lands (OCCL) comments that the Army received on the Second Draft EIS for the Pohakuloa Training Area (PTA) as their comments pertaining to a potential rule amendment in order for the proposed action to comply with the rules and regulations of the State Land Use Conservation District would appear to be applicable to the O‘ahu training lands.	Compliance with HAR Chapter 13-5, Conservation District, has been revised in Sections 1.4.3 (Table 1-2), 3.2, and 4.3.2 (Table 4-3).
Ryan K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)	State of Hawai‘i Department of Land and Natural Resources	ACRONYMS AND ABBREVIATIONS: Archaeological Resources Protection Act (ARPA) and Very Small Quantity Generator (VSQG) are not listed in this section. A further review of the document may be warranted to check if there are other omissions.	Editorial corrections have been made in the Final EIS (e.g., ARPA and VSQG have been removed from the EIS text; acronyms/abbreviations are



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	Natural Resources		only listed for words that appear at least three times in the document).
Ryan K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)	State of Hawai‘i Department of Land and Natural Resources	EXECUTIVE SUMMARY: • Regarding the documents listed in Table ES-1, there should be some type of access provided to the NEPA documents regarding the training and infrastructure within the State-owned lands at KTA, Poamoho and MMR. Searching the documents via the web did not produce access to any copies of the documents.	Publicly-available referenced documents in the EIS are identified in Chapter 5 and links have been added to the O‘ahu ATR EIS project website ( <a href="https://home.army.mil/hawaii/OahuEIS">https://home.army.mil/hawaii/OahuEIS</a> ) under the "Documents" tab.  To request other documents, the Army 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 K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)	State of Hawai‘i Department of Land and Natural Resources	Table ES-2, column one, portions should be revised as currently what is listed is regulatory citations rather than the permit or approval itself. Also, please also include the permits that are listed in Section 3.3.5.1, page 3-61 which are not included in Table ES-2. Note that these comments also apply to Table 1-2.	Tables ES-2 and 1-3 have been revised to include the potential permits noted in Table 3-8 in Section 3.3.5. Rows in these tables listing regulatory citations are intended to demonstrate acknowledgement, approval, or compliance with that regulation as appropriate as noted in the last column of the table.
Ryan K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)	State of Hawai‘i Department of Land and Natural Resources	In Section ES.4, it is identified that Alternative 2 is the preferred alternative. We suggest including a short discussion summarizing the reasoning for choosing Alternative 2 as this would be consistent with the concept that the Executive Summary should be self-contained without any further reference.	The Preferred Alternative has been modified in the Final EIS, and the reasoning for the Preferred Alternative has been updated in Section 2.5 and supplemented in Section ES.4.
Ryan K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)	State of Hawai‘i 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.	Sections ES.6 and 2.1 have been revised to clarify that the Proposed Action does not include a defined land retention duration for lease or easement 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. Future construction (modernization) is not part of the

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			Proposed Action, not currently planned, and would require separate future NEPA compliance.
Ryan K. P. Kanaka’ole (Russell Y. Tsuji - Land Division)	State of Hawai’i 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.
Ryan K. P. Kanaka’ole (Russell Y. Tsuji - Land Division)	State of Hawai’i Department of Land and Natural Resources	We also note that the resources section titled “Cultural and Historic Resources” is identified in Table 3-59 as “Historic and Cultural Resources.” You may wish to check the document for consistency.	Table ES-3 resource section has been corrected to read "Historic and Cultural Resources".
Ryan K. P. Kanaka’ole (Russell Y. Tsuji - Land Division)	State of Hawai’i Department of Land and Natural Resources	In Section ES.9, given the importance of identifying significant adverse impacts, we suggest including a more robust summary of the adverse impacts which would be consistent with the concept that the Executive Summary should be self-contained without necessarily further reference.	The Executive Summary provides a synopsis of the EIS. More detailed information on the adverse impacts can be found within each subsection of Chapter 3.
Ryan K. P. Kanaka’ole (Russell Y. Tsuji - Land Division)	State of Hawai’i Department of Land and Natural Resources	Section ES. 10 should include more information regarding the specific cumulative impacts as this would be consistent with the concept that the Executive Summary should be self-contained without necessarily further reference	The Executive Summary provides a synopsis of the EIS. More detailed information on the cumulative impacts can be found within each subsection of Chapter 3.
Ryan K. P. Kanaka’ole (Russell Y. Tsuji - Land Division)	State of Hawai’i 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 adverse impacts has been updated in ES. 11 and Section 3.5 of the Final EIS, and would be committed to in the ROD (under NEPA); however, should a lease option be pursued, discretionary decisions made in coordination with the Board of Land and Natural Resources may identify additional measures.
Ryan K. P. Kanaka’ole (Russell Y. Tsuji - Land Division)	State of Hawai’i Department of Land and Natural Resources	ES.12 as well as Section 2.1, page 2-2, second 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	Future lease conditions text in the Executive Summary, Chapter 2, and Appendix G has been revised to note that future lease conditions: * Would be similar to the current lease. * May include references to Federal and State

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		should be expected that lease conditions would be different and expanded.	regulations in existence at the time of a new lease. * May be revised or added by the State in a new lease, but that the EIS cannot precisely analyze potential impacts because those lease conditions are unknown.
Ryan K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)	State of Hawai‘i Department of Land and Natural Resources	ES.12 also includes a statement 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 regarding emerging contaminants in Sections ES.12 and 4.2.4 has been deleted. The cleanup and restoration activities for State-owned lands not retained would also be completed in accordance with applicable future requirements that are not yet known.
Ryan K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)	State of Hawai‘i Department of Land and Natural Resources	In addition, there is a statement that “Cleanup would likely fall under CERCLA, which has its own process outside this EIS process.” In Section 3.6 and 4.2.2 we would appreciate a summary or explanation of what the CERCLA procedure may entail as this would be helpful towards understanding the cleanup and restoration process.	Sections ES.12, 2.1, and 3.6 have been revised to include a summary that the Army would follow the CERCLA process in accordance with applicable DoD and Army regulations and processes. The CERCLA process includes phases such as preliminary assessment/site inspection, remedial investigation/feasibility study, remedial design/remedial action, and post-construction completion phases.  The Army would coordinate cleanup and restoration activities with the State of Hawai‘i throughout the CERCLA process.
Ryan K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)	State of Hawai‘i Department of Land and Natural Resources	CHAPTER 1: • If Section 1.1.2 is supposed to address the history of the Army land use on the O‘ahu state-owned lands, it is confusing as to why the reader is referred to other sections for additional information regarding the historical land tenures for the three areas.	References to other sections in the EIS were included so that a detailed history of land use could be tied to the impacts to relevant resources in their resource area sections of the EIS, to avoid redundancy, and to adhere to document page limits as required by NEPA.
Ryan K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)	State of Hawai‘i Department of Land and Natural Resources	• In Section 1.5, 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 1.5 has been revised and an Appendix L, Additional Public Engagement Efforts, has been added. Table 3-58 in Section 3.12 also includes descriptions of major community engagement

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	Natural Resources		activities and ongoing community outreach and support programs.
Ryan K. P. Kanaka’ole (Russell Y. Tsuji - Land Division)	State of Hawai’i Department of Land and Natural Resources	CHAPTER 2 • In Section 2.1, the second paragraph 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.	Section 2.1 has been revised to reference HEPA compliance.
Ryan K. P. Kanaka’ole (Russell Y. Tsuji - Land Division)	State of Hawai’i Department of Land and Natural Resources	First paragraph of page 2-3, the document states that “After the lease expires, 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), within the State-owned land not retained [would occur]...” While we understand you believe this is not a part of the proposed action, any lands returned to the State would need to go through such a process and thus may be considered, from a HEPA perspective, a part of the project. Moreso, the no action alternative would require cleanup and remediation work and should be analyzed within the Draft EIS, therefore, USAG-HI should provide a summary of what cleanup and remediation could potentially involve.	<p>Section 2.1 has been revised to indicate that the Army would coordinate cleanup and restoration activities with the State of Hawai’i throughout the CERCLA process.</p> <p>Sections ES.12, 2.1, and 3.6 have been revised to include a summary that the Army would follow the CERCLA process in accordance with applicable DoD and Army regulations and processes. The CERCLA process includes phases such as preliminary assessment/site inspection, remedial investigation/feasibility study, remedial design/remedial action, and post-construction completion phases.</p> <p>Section 4.2.4 discusses the reasons why specific cleanup and restoration activities after lease expiration are not able to be determined at this time.</p>
Ryan K. P. Kanaka’ole (Russell Y. Tsuji - Land Division)	State of Hawai’i Department of Land and Natural Resources	Please provide the standard operating procedure documents for the different training areas that were referenced in Chapter 2.	Training Standard Operating Procedures (SOPs) are internal documents that are not available for public disclosure. Appendix F includes relevant information from the SOPs. The Freedom of Information Act (FOIA) Library and FOIA Request processes 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> .

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<p>Ryan K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)</p>	<p>State of Hawai‘i Department of Land and Natural Resources</p>	<p>Section 2.2.4.2 states that “MMR has combined live-fire capability that is not currently being used” and that “...the Army has determined that it will not pursue live-fire training at MMR. It is therefore not reasonably foreseeable and is not analyzed in this EIS.” This language appears to be somewhat contrary as to what was released by the media back in December 2023 as it lacks the level of commitment that was expressed by the US Army Pacific Spokesperson, Colonel Rob Phillips, who was quoted saying that “The U.S. Army discontinued live first activities at the Makua Military Reservation in 2004. In October, U.S. Army Pacific leadership signed a memorandum stating that there are no plans to resume live-fire at MMR, now or in the future.” This commitment should be reiterated and conveyed in the Draft EIS, unless the Army has since decided otherwise.</p>	<p>Section 1.1.2.3 has been revised to indicate that the Army will not pursue live-fire training at MMR at this time or in the future.</p>
<p>Ryan K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)</p>	<p>State of Hawai‘i Department of Land and Natural Resources</p>	<p>Section 2.2.4.3 discusses training on the Center Tract at MMR. It would appear there are areas with MEC hazards that are not usable due to the hazards. Please clarify if these hazardous areas are located within the State-owned lands and if so, please explain why these lands have not undergone remediation as of yet.</p>	<p>Section 3.6.1 and Appendix J have been revised to add the definition of operational ranges. Current management measures to mitigate potential impacts from hazardous substances and hazardous wastes are discussed in Section 3.6.5.</p> <p>Section 3.6.5 has been revised to clarify that the entirety of the State-owned land enclosed by the fence east of Farrington Highway at MMR, 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. Until lease expiration, or designation of certain areas of the State-owned land as “closed ranges,” MEC on State-owned land at MMR will continue to be managed under the MMR SOPs.</p>

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Ryan K. P. Kanaka’ole (Russell Y. Tsuji - Land Division)	State of Hawai’i Department of Land and Natural Resources	Section 2.3.2.3, Alternative 3, states that an issue is that the Army would no longer have access to the maneuver training lands (approximately 610 acres) and support facilities on the North Ridge, South Ridge, and the Makai Tracts. However, it would appear that the only training being conducted on all three of these tracts is aviation training. Therefore, it isn’t clear why not having access to those lands would be problematic as they mostly act as a buffer for encroachments and accidental or intentional trespass.	The MMR tracts (i.e., North Ridge, South Ridge, and Makai Tracts) would have value as encroachment buffers.  Aviation training activities at the training areas containing the State-owned lands are discussed in Section 2.2.1.5. The discussions for each training area in Section 2.2 also identify specific aviation training activities. While the No Action Alternative is now identified as the Preferred Alternative for Poamoho and MMR as stated in Section 2.5 of the Final EIS, aviation training can still occur without the continued retention of State-owned lands.
Ryan K. P. Kanaka’ole (Russell Y. Tsuji - Land Division)	State of Hawai’i Department of Land and Natural Resources	Section 2.3.3.2 includes a discussion of training at MMR’s CCAC which states that the Army is no longer able to use the Buffalo Objective to support maneuver training due to the presence of cultural resources. We note that the training objective units are listed on Figure 2-3 but are not discussed in any of the sections. Therefore, we ask that more context be given regarding the objective units and their importance to training, and which units are in use or not in use.	Section 2.2.4 has been revised to reflect that the CCAAC is no longer in use and is in the process of being dismantled. The locations of the objectives have been removed from Figure 2-3; the CCAAC location/boundary has been left on the figure for context only.
Ryan K. P. Kanaka’ole (Russell Y. Tsuji - Land Division)	State of Hawai’i Department of Land and Natural Resources	CHAPTER 3: • Please include a complete copy of all the referenced documents in their entirety as referenced within this Chapter.	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...” This EIS provides such summaries, and including reference documents in the Appendices is not an explicit content requirement of HAR 11-200.1. Reference documents for public access have been added to the O’ahu EIS website ( <a href="https://home.army.mil/hawaii/oahueis/project-home">https://home.army.mil/hawaii/oahueis/project-home</a> ) under the “Documents” tab.
Ryan K. P. Kanaka’ole	State of Hawai’i Department of	In Section 3.2.5, the ceded lands discussion should further elaborate that the Admission Act also included language that that	The discussion of ceded lands under Section 3.2 has been revised to include that the Admission

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(Russell Y. Tsuji - Land Division)	Land and Natural Resources	lands no longer needed by the US should be conveyed back to the State.	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 K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)	State of Hawai‘i 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.	All the resource areas, and Land Use, Biological Resources, and Noise in particular, in Chapter 3 present Existing Management Measures before the Existing Conditions subsection of each respective training area to avoid unnecessary repetition because the measures are applicable to all three training areas. To avoid confusion and better guide the reader, headers and references back to the Existing Management Measures section, where appropriate, have been added after each training area in Existing Conditions to guide the reader.
Ryan K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)	State of Hawai‘i Department of Land and Natural Resources	Section 3.2.5.2 and Section 3.2.5.3 are missing a discussion on impacts to recreation. Please revise accordingly.	The Recreation discussion was presented in the Draft EIS, but was missing headers; this formatting error has been corrected in the Final EIS.
Ryan K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)	State of Hawai‘i Department of Land and Natural Resources	Section 3.3.5.1 under the subheading Environmental Consequences, on page 3-61, the third paragraph focuses on impacts to the pueo. Staff notes that while the Draft EIS notes that the pueo is a State listed endangered species, there is no discussion regarding compliance with State rules and regulations. Further, we ask that the Army clarify what additional protections they believe would be involved should the State “require (through negotiation) that the Army treat the pueo as if it were federally listed.” Staff also notes that under the subsection, Full retention via Fee Simple Title and its Impacts, the Draft EIS states that “the pueo might receive less protection under fee simple title retention compared to a lease.” Staff asks that the Army elaborate on the impacts to the pueo as it would appear that less protection would also equate to a larger impact. Further, Staff would ask the Army to confirm that under the	The current lease does not require special measures for the pueo, or any State-listed species, and does not differ from conditions under fee simple Federal ownership of the lands; however, in accordance with Department of Defense Instruction (DODI) 4715.03, the Army would protect pueo and other State-listed species, to the extent practicable.  A new lease might require more protection of State-listed species; the Army cannot predict what those protections would be, and therefore, cannot predict what the difference in impacts, if any, would be. As noted in the EIS, protection of

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		fee simple alternative, it intends to invoke the supremacy clause thus not needing to comply with the State laws and regulations protecting the pueo.	<p>State-listed species occurs when it is practicable as outlined in the installation's INRMP, which includes the availability of funds. Section 3.3.5 has been updated to reflect additional information.</p> <p>Volume II Appendix J describes the regulatory framework to which the Army complies.</p>
Ryan K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)	State of Hawai‘i Department of Land and Natural Resources	Section 3.3.5.3, under the subheading Amphibians, Reptiles, and Fish, please elaborate on the statement made that “Constituents associated with military training were detected in samples collected from marine species.” The discussion should include the type of constituents found, in what quantities, and the effects on the marine species.	Additional information has been included in Section 3.3.5.3 to address constituents associated with military training found in marine species.
Ryan K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)	State of Hawai‘i Department of Land and Natural Resources	Section 3.10.4.1, subheading Surface Water Quality, please include a discussion of the impacts that the four-component program has identified as well as any mitigation that was proposed as an outcome of the four-component program.	Section 3.10.5.1 has been revised with Army plans that are implemented to address potential impacts and reference to other sections where these plans are discussed.
Ryan K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)	State of Hawai‘i Department of Land and Natural Resources	Section 3.10.4.1, subheading Environmental Consequences - KTA, please include a discussion of the impacts that may be related to vehicular or aviation spills. Please also further elaborate on what mitigation has been done or is ongoing to address impacts from runoff, erosion, and sedimentation.	Section 3.6 Hazardous Substances and Hazardous Waste contains discussion about vehicular or aviation spills. As stated, the minimization of impacts on geological and soil resources from ongoing activities is achieved through a number of institutional procedures, including the Integrated Training Area Management (ITAM) Training Requirement Integration Program, Sustainable Range Awareness Program, and training and policies provided by the USAG-HI DPW Environmental Division. These program mitigation measures are further discussed in Appendix F.
Ryan K. P. Kanaka‘ole (Russell Y. Tsuji - Land Division)	State of Hawai‘i Department of Land and Natural Resources	Section 3.10.5.3, subheading Existing Management Measures, please elaborate on “the procedures outlined in the Erosion Control BMPs Program Plan, INRMP, SPCC Plan, SWMP, [and] the SOP for MMR.” Should you have any questions or concerns regarding this correspondence, please contact Lauren Yasaka of the Land Division	Appendix F outlines the management measures from these documents relevant to training land retention and O‘ahu State-owned lands.



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Ryan K. P. Kanaka‘ole (Brian J. Neilson - Division of Aquatic Resources)	State of Hawai‘i Department of Land and Natural Resources	<p>at (808) 587-0431. Sincerely, Russell Y. Tsuji, Administrator Land Division</p> <p>Comments The leased lands discussed in the Draft Environment Impact Statement (DEIS) all contain, are adjacent to, or have connectivity with bodies of water that contain, or are suspected to contain aquatic resources. All three training areas: Makua Military Reservation, Kahuku Training Area, and the Kawaiiloa-Poamoho Training Area have water-bodies associated with them in the form of streams, floodplains, wetlands, and coastal areas. Potential impacts to aquatic resources may not just be limited to bodies of water falling within the leased lands. Connectivity to the marine environment via surface runoff and groundwater means that actions limited to these areas may have impacts falling outside of their bounds. In general, threats to these resources could include but are not limited to stream diversion, land development, sedimentation, loss of groundwater, pollution, invasive species, channel hardening, and loss of surrounding vegetation including native species. The Division of Aquatic Resources (DAR) recognizes that current leases of these lands may help to alleviate some of these threats insofar as they limit general access and development as well as providing mitigation measures. However, DAR also notes that the ongoing military exercises in these areas are not without their impacts or risks. Live fire exercises, use of military grade machinery and equipment, and other activities within these areas do present risks to the environment that would otherwise not be present under limited civilian use only. Therefore, the Division of Aquatic Resources recommends the adoption and use of Best Management Practices (BMPs) for riparian zones and other areas and specific watershed management projects to provide the mechanism for attaining watershed management goals by maintaining the integrity of stream courses, reducing the volume of surface runoff originating from disturbed areas and running directly into surface water, minimizing the movement of pollutants (e.g., nutrients) and sediment to surface water and groundwater, and</p>	<p>Existing management measures, including BMPs, are discussed in Section 3.10. Also see Appendix J for regulations enacted and policies and guidance provided that create the regulatory framework to ensure water quality and supply are protected, and impacts from Army installation activities on water resources are minimized.</p> <p>Live-fire training has not been permitted or conducted on MMR since 2004. Live-fire training is not conducted at Poamoho or on the State-owned land at KTA.</p> <p>The Proposed Action addressed in this administrative EIS is a real estate transaction (land retention). Military training is discussed only in the context of ongoing activities and their impacts because of land retention, and no changes in training are proposed. Ongoing training has been addressed through previous NEPA and other planning documents, which included measures to address impacts from training activities. This EIS reviews this ongoing use and identifies mitigation.</p> <p>Section 3.10.5.1 and 3.10.5.3 discuss Army involvement in watershed management groups.</p>

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Ryan K. P. Kanaka'ole (Brian J. Neilson - Division of Aquatic Resources)	State of Hawai'i Department of Land and Natural Resources	<p>stabilizing exposed mineral soil areas through natural or artificial revegetation means.</p> <p>The Division of Aquatic Resources requests that the U.S. Army Natural Resources Program conduct aquatic surveys in these areas as they are not readily accessible to the public. The aquatic biota in the streams are managed and conserved by the DAR and therefore an inventory of what aquatic species inhabits streams on these State-owned lands under U.S. Army jurisdiction is important for the State. Hawaiian streams, rivers, and estuaries provide habitat for native aquatic biota composed of 5 fish species 'o'opu akupa (Eleotris sandwicensis), 'o'opu naniha ( Stenogobius hawaiiensis), 'o'opu nakea (Awaous hawaiiensis), 'o'opu nopili (Sicyopterus stimpson), 'o'opu 'alamo'o (Lentipes concolor); 2 crustacean species 'opae 'oeha'a (Macrobrachium grandimanus), 'opaekala'ole (Atyoida bisu/cata); and 2 mollusk species hapawai (Neritina vespertina), and hihiwai (Neritina granosa) which may occur in the stream maintenance locations. The estuary (muliwai) also provides habitat for 3 native fish species: aholehole (Kuhlia xenura, Kuh/ia sandwicensis), 'ama'ama (Mugil cephalus). All the native stream biota shares an amphidromous life cycle which means they have a dependence on connectivity to the ocean. The adult animals lay their eggs in the stream and as the larvae hatch, they are swept downstream into the ocean, where they grow into post-larvae/juveniles before migrating back upstream. <u>Therefore, it is important that all military activities avoid creating barriers that could block this downstream and upstream movement along with stream flow, along with BMPs to prevent pollutants from entering, leaching, or blowing into the stream ecosystem.</u> DAR recognizes that these lands are important in maintaining the capability and readiness of US armed forces. A balance must be met between providing access to the lands for training activities and minimizing potential impacts. DAR supports steps to re-evaluate land use in these areas with the intent of lessening impacts or threat of impacts while still allowing access for training.</p>	A survey of aquatic resources on Federal land is outside the scope of this EIS.

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<p>Ryan K. P. Kanaka’ole (Tiger Mills - OCCL)</p>	<p>State of Hawai’i Department of Land and Natural Resources</p>	<p>Like the second draft EIS for the Pōhakuloa Training Area on Hawai’i, the O’ahu draft EIS’s Section 3.2.4 entitled Methodology and Significance Criteria under Land Use assumes: “The State would accept a petition for, and might authorize, a special subzone in the conservation district under HAR Section 13-5-16 to allow military uses of the State-owned land retained by the Army.” Therefore, the OCCL has the same comments: The process to create a Special Subzone involves a rule amendment to HAR 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 NAR, 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. 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</p>	<p>Compliance with HAR Chapter 13-5, Conservation District, has been revised in Sections 1.4.3 (Table 1-2), 3.2.4, and 4.3.2 (Table 4-3).</p>

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		<p>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 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 stated in HRS 205.</p>	
<p>Ryan K. P. Kanaka’ole (Tiger Mills - OCCL)</p>	<p>State of Hawai’i Department of Land and Natural Resources</p>	<p>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. Should there be any questions regarding this correspondence, contact Tiger Mills of the OCCL at [REDACTED] or at [REDACTED]. Sincerely, K. Tiger Mills, Staff Planner Office of Conservation and Coastal Lands</p>	<p>Please see General Response.</p>
<p>Ryan K. P. Kanaka’ole (Afsheen A. Siddiqi - DOFAW)</p>	<p>State of Hawai’i Department of Land and Natural Resources</p>	<p>The State listed 'ope'ape'a or Hawaiian Hoary Bat (<i>Lasiurus cinereus semotus</i>) could potentially occur at or in the vicinity of the project and may roost in nearby trees. Any required site clearing should be timed to avoid disturbance to bats during their birthing and pup rearing season (June 1 through September 15). During this period woody plants greater than 15 feet (4.6 meters) tall should not be</p>	<p>The Proposed Action does not include any proposed construction activity that would necessitate clearing or removal of trees. The Army uses barbed wire judiciously when additional security necessitates the use, and any fences that</p>

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		<p>disturbed, removed, or trimmed. Barbed wire should also be avoided in any construction as bats can become ensnared and killed by such fencing material during flight.</p>	<p>would be put up as a mitigation measure would not have a barbed wire component.</p>
<p>Ryan K. P. Kanaka'ole (Afsheen A. Siddiqi - DOFAW)</p>	<p>State of Hawai'i Department of Land and Natural Resources</p>	<p>Artificial lighting can adversely impact seabirds that may pass through the area at night by causing them to become disoriented. This disorientation can result in their collision with manmade structures or the grounding of birds. For nighttime work that might be required, DOFAW recommends that all lights used be fully shielded to minimize the attraction of seabirds. Nighttime work that requires outdoor lighting should be avoided during the seabird fledging season, from September 15 through December 15, when young seabirds make their maiden voyage to sea. If nighttime construction is required during the seabird fledging season (September 15 to December 15), we recommend that a qualified biologist be present at the project site to monitor and assess the risk of seabirds being attracted or grounded due to the lighting. If seabirds are seen circling around the area, lights should then be turned off. If a downed seabird is detected, please follow DOFAW's recommended response protocol by visiting <a href="https://dlnr.hawaii.gov/wildlife/seabird-fallout-season/">https://dlnr.hawaii.gov/wildlife/seabird-fallout-season/</a>. Permanent lighting also poses a risk of seabird attraction, and as such should be minimized or eliminated to protect seabird flyways and preserve the night sky. For illustrations and guidance related to seabird-friendly light styles that also protect seabirds and the dark starry skies of Hawai'i please visit <a href="https://dlnr.hawaii.gov/wildlife/files/2016/03/DOC439.pdf">https://dlnr.hawaii.gov/wildlife/files/2016/03/DOC439.pdf</a>.</p>	<p>The Army complies with Policy Memorandum USAG-HI-35, Wildlife Friendly Lighting and Dark Skies which includes standard operating procedures and best management practices for lighting use. The Proposed Action does not include any proposed construction or training activities that would necessitate additional lighting.</p>
<p>Ryan K. P. Kanaka'ole (Afsheen A. Siddiqi - DOFAW)</p>	<p>State of Hawai'i Department of Land and Natural Resources</p>	<p>The State endangered pueo or Hawaiian Short-eared owl (<i>Asio f. ammeus sandwichensis</i>) could potentially occur in the project vicinity. Pueo are most active during dawn and dusk twilights. Remove and exclude non-native mammals such as mongoose, cats, dogs, and ungulates from the nesting area. Minimize habitat alterations and disturbance during pueo breeding season. Pueo nest on the ground and active nests have been found year-round. Before any potentially disturbing activity like clearing vegetation, especially ground-based disturbance, DOFAW recommends a qualified biologist conduct surveys during crepuscular hours and</p>	<p>The Army works diligently to control small mammals and ungulates on all Army lands. These efforts are generally described in Section 3.3.5, and for respective training areas in Sections 3.3.5.1, 3.3.5.2, and 3.3.5.3.</p> <p>The Proposed Action does not include any proposed construction or training activities. The Army strives to work closely and coordinate with all appropriate agencies.</p>

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		walk line transects through the area to detect any active pueo nests. If a pueo nest is discovered, notify DOFAW staff, minimize time spent at the nest, and establish a minimum buffer distance of 100 meters from the nest until chicks are capable of flight.	
Ryan K. P. Kanaka'ole (Afsheen A. Siddiqi - DOFAW)	State of Hawai'i Department of Land and Natural Resources	The State endangered 'ilio holo i ka uaua or Hawaiian Monk Seal ( <i>Monachus schauinsland</i> ) and threatened honu or Green Sea Turtle ( <i>Chelonia mydas</i> ) could potentially occur or haul out onshore within the vicinity of the proposed project site. Nesting season for honu is April through December and 'ilio halo i ka uaua can give birth to pups all year round. If either species is detected within 100 feet (30 meters) of the project area, all nearby construction operations should cease and not continue until the focal animal has departed the area on its own accord.	The Army does not conduct training activities on the Makai Tract. The Proposed Action does not include any proposed construction or training activities. The Army strives to work closely and coordinate with all appropriate agencies.
Ryan K. P. Kanaka'ole (Afsheen A. Siddiqi - DOFAW)	State of Hawai'i Department of Land and Natural Resources	State-listed waterbirds such as ae'o or Hawaiian stilt ( <i>Himantopus mexicanus knudsem</i> ), 'alae ke'oke'o or Hawaiian coot ( <i>Fulica a/a1</i> ), and 'alae 'ula or Hawaiian gallinule ( <i>Gallinula chloropus sandvicensis</i> ) could potentially occur at or in the vicinity of the proposed project site. It is against State law to harm or harass these species. If any of these species are present during construction, 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 O'ahu Branch DOFAW Office at (808) 973-9778 and establish a buffer zone around the nest.	The Army does not conduct training activities on the Makai Tract. The Proposed Action does not include any proposed construction or training activities. The Army strives to work closely and coordinate with all appropriate agencies.
Ryan K. P. Kanaka'ole (Afsheen A. Siddiqi - DOFAW)	State of Hawai'i Department of Land and Natural Resources	DOFAW recommends using native plant species for landscaping that are appropriate for the area; i.e., plants for which climate conditions are suitable for them to thrive, plants that historically occurred there, etc. Please do not plant invasive species. DOFAW also recommends referring to <a href="http://www.plantpono.org">www.plantpono.org</a> for guidance on the selection and evaluation of landscaping plants and to determine the potential invasiveness of plants proposed for use in the project.	The Army complies with Policy Memorandum USAG-HI-63, Landscaping with Native Plants, which provides guidance for usage of native plants in landscaping. The Proposed Action does not include any proposed construction; therefore, no associated landscaping would be necessary.
Ryan K. P. Kanaka'ole (Afsheen A. Siddiqi - DOFAW)	State of Hawai'i Department of Land and	DOFAW recommends minimizing the movement of plant or soil material between worksites. Soil and plant material may contain detrimental fungal pathogens (e.g., Rapid 'Ohi'a Death), vertebrate and invertebrate pests (e.g., Little Fire Ants, Coconut Rhinoceros	The Army works diligently to minimize the spread of and to control invasives species, and has invasive species experts on staff. Efforts to

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	Natural Resources	Beetles, etc.), or invasive plant parts (e.g., Miconia, Pampas Grass, etc.) that could harm our native species and ecosystems. We recommend consulting the O'ahu Invasive Species Committee (OISC) at (808) 266-7994 to help plan, design, and construct the project, learn of any high-risk invasive species in the area, and ways to mitigate their spread. All equipment, materials, and personnel should be cleaned of excess soil and debris to minimize the risk of spreading invasive species.	minimize the spread of and control of invasive species is described in Section 3.3.5.
Ryan K. P. Kanaka'ole (Afsheen A. Siddiqi - DOFAW)	State of Hawai'i Department of Land and Natural Resources	The invasive Coconut Rhinoceros Beetle (CRB) or <i>Oryctes rhinoceros</i> is found on the islands of O'ahu, Hawai'i Island, Maui and Kaua'i. On July 1, 2022, the Hawai'i Department of Agriculture (HDOA) approved Plant Quarantine Interim Rule 22-1. This rule restricts the movement of CRB-host material within or to and from the island of O'ahu, which is defined as the Quarantine Area. Regulated material (host material or host plants) is considered a risk for potential CRB infestation. Host material for the beetle specifically includes a) entire dead trees, b) mulch, compost, trimmings, fruit and vegetative scraps, and c) decaying stumps. CRB host plants include the live palm plants in the following genera: <i>Washingtonia</i> , <i>Livistona</i> , and <i>Pritchardia</i> (all commonly known as fan palms), <i>Cocos</i> (coconut palms), <i>Phoenix</i> (date palms), and <i>Roystonea</i> (royal palms). When such material or these specific plants are moved there is a risk of spreading CRB because they may contain CRB in any life stage. For more information regarding CRB, please visit <a href="https://dlnr.hawaii.gov/hisc/info/invasive-species-profiles/coconut-rhinoceros-beetle/">https://dlnr.hawaii.gov/hisc/info/invasive-species-profiles/coconut-rhinoceros-beetle/</a> .	The Army works diligently to minimize the spread of and to control invasive species and implements USAG-HI green waste Policy 50. Efforts to minimize the spread of and control of invasive species is described in Section 3.3.5.
Ryan K. P. Kanaka'ole (Afsheen A. Siddiqi - DOFAW)	State of Hawai'i Department of Land and Natural Resources	You should avoid importing to O'ahu soil or other plant material from off-island. Soil and plant material may contain fungi (e.g., Rapid 'Ohi'a Death) and other pathogens that could harm our native species and ecosystems. We recommend consulting the Hawai'i Interagency Biosecurity Plan at <a href="http://dlnr.hawaii.gov/hisc/plans/hibp/">http://dlnr.hawaii.gov/hisc/plans/hibp/</a> in planning, design, and construction of the project.	The Proposed Action is a real estate action (retention of the State-owned lands) and does not include construction or changes to ongoing activities conducted within the State-owned lands retained. No soil or plant material are expected to be imported from off-island under the Proposed Action.
Ryan K. P. Kanaka'ole	State of Hawai'i Department of	DOFAW notes that there is concern regarding potential impact to cultural resources, based on work in a nearby, adjacent project	The EIS relies on existing studies to present what is known of current conditions, and the full

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(Afsheen A. Siddiqi - DOFAW)	Land and Natural Resources	area. This area is a well-documented significant place with many undocumented archaeological sites that have not been assessed in a comprehensive way. We are finding that there are many more cultural and historic sites than previously known. DOFAW recommends that the State Historic Preservation Division be consulted regarding the proposed project work.	<p>summary in contained is the Historic and Cultural Resources Literature Review (Appendix I).</p> <p>Section 3.4 of the Final EIS has been updated with new Figures 3-14 and 3-15 (for KTA and MMR, respectively) showing cultural resource survey coverage areas. Sections 3.4.5.1 (for KTA) and 3.4.5.3 (for MMR) have been revised to explain that the majority of State-owned lands used for ground training have been surveyed, and reasons why remaining areas are constrained. Poamoho is not used for ground training and is a heavily dissected, steeply sloping landscape. All training related activities are subject to NHPA Section 106 Compliance. The Army continues to conduct surveys as funding is made available prior to using land for training to fulfill NHPA compliance commitments.</p> <p>It is unclear what the "nearby project area" is, however, the scope of the EIS is limited to identifying impacts within the ROI.</p>
Ryan K. P. Kanaka‘ole (Afsheen A. Siddiqi - DOFAW)	State of Hawai‘i Department of Land and Natural Resources	Due to the arid climate and risks of wildfire to listed species, we recommend coordinating with the Hawai'i Wildfire Management Organization at [REDACTED] or [REDACTED], on how wildfire prevention can be addressed in the project area. When engaging in activities that have a high risk of starting a wildfire (i.e. welding in grass), it is recommended that you: • Wet down the area before starting your task, • Continuously wet down the area as needed, • Have a fire extinguisher on hand, and • In the event that your vision is impaired, (i.e. welding goggles) have a spotter to watch for fire starts.	As noted in Section 3.14, the Integrated Wildland Fire Management Plan (IWFMP) for O‘ahu Installations lays out specific guidance, procedures, and protocols for the prevention and suppression of wildfires on O‘ahu training areas, including KTA, Poamoho, and MMR. The IWFMP also describes the methods and procedures necessary to minimize fire frequency, severity, and size while providing military units the ability to conduct training. Further information regarding wildfire management, prevention, and suppression was added to Section 3.14, as applicable.



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<p>Ryan K. P. Kanaka‘ole (Afsheen A. Siddiqi - DOFAW)</p>	<p>State of Hawai‘i Department of Land and Natural Resources</p>	<p>We recommend that Best Management Practices are employed during and after construction to contain any soils and sediment with the purpose of preventing damage to near-shore waters and marine ecosystems. 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 [REDACTED]. Sincerely, ~ AFSHEEN A. SIDDIQI Acting Wildlife Program Manager</p>	<p>The Proposed Action is a real estate action (retention of the State-owned lands) and does not include construction or changes to ongoing activities conducted within the State-owned lands retained.</p>
<p>Ryan K. P. Kanaka‘ole (Susan A. Lebo - SHPD)</p>	<p>State of Hawai‘i Department of Land and Natural Resources</p>	<p>The assessments of environmental impacts related to historical and cultural resources within the three training areas relies heavily on the information summarized in Volume III, Appendix I. This appendix consists of an archaeological literature review completed by Kleinfelder, Inc. (Gross et al., September 2023). It only addresses the Region of Influence (ROI) for historic and cultural resources which is defined as the entirety of the State-owned lands at KTA, Poamoho, and MMR, and a 100-foot buffer around these State-owned lands. This literature review is titled FINAL— Historic and Cultural Resources Literature Review for Army Training Land Retention of State Lands in Makua Military Reservation, Kahuku Training Area, and Kawailoa-Poamoho Training Area, Island of O‘ahu, Hawai‘i, TMKS: (1) 5-8-002:002; (1) 5-9-006:026; (1) 6-9-003:001 (por.); (1) 7-2-001:006; (1) 8-1-001:007 (por.); (1) 8-1-001:008; (1) 8-1-001:012 (por.); (1) 8-2-001:002 (por.); and (1) 8-2-001:001, 022, 024, and 025. SHPD recommends that the following critical concerns be addressed prior to concurrence with the assessments of environmental impacts related to each of the proposed alternatives: 1. The Historic and Cultural Resources Literature Review (Gross et al. 2023) provides an inadequate</p>	<p>The EIS relies on existing studies to present what is known of current conditions, and the full summary in contained is the Archaeological Literature Review (Appendix I).</p> <p>As stated in Section 1.4.3 (Table 1-2), the Proposed Action is an administrative (e.g., real estate) action, with no undertaking that would require consultation under Section 106 of the NHPA.</p> <p>It is unclear what the "nearby project area" is; however, the scope of the EIS is limited to identifying impacts within the ROI.</p>

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		<p>baseline for assessing the direct, indirect, and cumulative impacts to historic and cultural resources within the State-owned lands. No maps or descriptions are provided showing the spatial extent of surveys that extended beyond the ROI into Federal-owned property, including historic and cultural resources that extend beyond the ROI. Assessments of integrity, site significance, eligibility for listing in the National Register of Historic Places (NRHP) are at the scale of site or resource. As such, it is critical to know the full spatial extent of these historic and cultural resources, including portions outside the ROI, and what activities outside the ROI have impacted or have potential to adversely impact the portions outside the ROI. ... 6. SHPD also opines that the analysis of historic and cultural resources within the State-owned lands may only be accurately completed when the identified cultural resources are evaluated within the broader spatial context within each of the three training areas, particularly in those areas where resources within the ROI are known to extend outside the ROI.</p>	
<p>Ryan K. P. Kanaka’ole (Susan A. Lebo - SHPD)</p>	<p>State of Hawai’i Department of Land and Natural Resources</p>	<p>2. The Historic and Cultural Resources Literature Review (Gross et al. 2023) provides information on site type, age, and function, but not on condition, integrity, significance, character-defining features, and eligibility criteria per NRHP Bulletin 36. Also absent is documentation as to which historic or cultural resources have been formally evaluated for NRHP eligibility and which such evaluations the State Historic Preservation Officer (SHPO) has been provided the opportunity to review and provided concurrence.</p>	<p>As discussed in Section 3.4.5.3 all un-evaluated historic and cultural resources within the State-owned land are treated as eligible for listing in the NRHP and are required to be avoided by training actions.</p> <p>The Historic and Cultural Resources Literature Review notes that none of the historic and cultural resources at KTA have been subjected to evaluations of eligibility for the NRHP. EIS Section 3.4.5.3 states that Ukanipo Heiau is listed on the NRHP. All other historic and cultural resources within the State-owned land at MMR have not been evaluated for eligibility in the NRHP. Historic and cultural resources that have not been evaluated for eligibility in the NRHP are considered eligible and treated as such.</p>

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Ryan K. P. Kanaka‘ole (Susan A. Lebo - SHPD)	State of Hawai‘i Department of Land and Natural Resources	<p>3. The archaeological survey data provided for State-owned lands is inadequate. The following examples are not intended to be exhaustive. a. For MMR, the text and maps showing the spatial extent of completed surveys indicate only approximately 681 acres of the approximately 982 acres comprising the ROI have been subject to an adequate archaeological survey (Appendix I, Figure 22). Of the 11 surveys reported, only 1 was conducted in the past 10 years, and 8 were completed over 18 years ago. Some of the historic properties are described as extending beyond the ROI, but they are not identified, and their full spatial extent is not provided. In 2005, USAG-HI archaeologists recorded damage to Site 50-80-03-6619, a Traditional Hawaiian wall complex, indicating Features 1 and 3 were “severely impacted by the detonation of a 100-lb. bomb” despite the installation of protective measures (Site 50-80-03-6619, Features 1 and 3). However, no recent historical or cultural resources surveys have been conducted to assess current site conditions at each of the historic properties within the ROI. Thus, it is unknown as to which historic properties may have been adversely impacted since they were recorded, including impacts related to current military activities. Surveys need to be conducted of the currently un-surveyed portion of the MMR ROI in order to provide an accurate baseline of historic properties (types and distributions) and for assessing impacts of continued military activities. Lastly, not all identified archaeological sites have been adequately documented and few sites or features have been subject to subsurface testing and as such little is known about potential subsurface historic and/or cultural resources within the ROI.</p>	<p>As discussed in Section 3.4.5.3 all un-evaluated historic and cultural resources within the State-owned land are treated as eligible for listing in the NRHP and are required to be avoided by training actions.</p> <p>The Historic and Cultural Resources Literature Review notes that none of the historic and cultural resources at KTA have been subjected to evaluations of eligibility for the NRHP. EIS Section 3.4.5.3 states that Ukanipo Heiau is listed on the NRHP. All other historic and cultural resources within the State-owned land at MMR have not been evaluated for eligibility in the NRHP. Historic and cultural resources that have not been evaluated for eligibility in the NRHP are considered eligible and treated as such.</p>
Ryan K. P. Kanaka‘ole (Susan A. Lebo - SHPD)	State of Hawai‘i Department of Land and Natural Resources	<p>3. The archaeological survey data provided for State-owned lands is inadequate. The following examples are not intended to be exhaustive... b. For KTA, adequate surveys are reported for approximately 596 acres of the approximately 1,268-acre ROI. Like the data provided for MMR, no information is provided regarding the “studies at the reconnaissance level that do not meet the Army’s current standards and so are not counted toward the</p>	<p>Section 3.4.5.1 (KTA) has been updated to include additional surveys and a new Figure 3-14 is provided to show archaeological survey coverage area on KTA State-owned land.</p>

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		<p>current assessment.” While SHPD agrees that surveys that do not meet current standards should be separated from those that do, they should be discussed, their spatial extent shown, and any potential historic or cultural resources observed. The two studies identified were reconnaissance surveys with limited subsurface testing. The majority are related to pre-World War II and later military use of the area.</p>	
<p>Ryan K. P. Kanaka’ole (Susan A. Lebo - SHPD)</p>	<p>State of Hawai’i Department of Land and Natural Resources</p>	<p>3. The archaeological survey data provided for State-owned lands is inadequate. The following examples are not intended to be exhaustive... c. No surveys have been conducted and no historic or cultural resources have been identified within the ROI for Poamoho. Gross et al. (2023) indicates that the lack of surveys reflects the rugged environment and low non-aviation training activities, thus a lack of compliance needs. <u>SHPD opines that the USAG-HI is responsible for conducting surveys to identify, document, and assess the eligibility of historic and cultural resources within each training area and, where such resources are identified to undertake measures to avoid, minimize, or mitigate impacts to them.</u> As such, no baseline data regarding historic and cultural resources has been obtained for Poamoho.</p>	<p>EIS Section 3.4.5.1 (KTA) has been updated to discuss surveys that do not meet Army standards and a new Figure 3-14 is provided to show archaeological survey coverage area on KTA State-owned land.</p> <p>Army survey standards include one or more qualified and supervised personnel conducting surveys, appropriately distanced transects, compliance with Army’s artifact collection policy, and documentation requirements for discoveries of potential historic properties. These standards are discussed in greater detail in Appendix F of the 2018 Section 106 PA (<a href="https://home.army.mil/hawaii/5915/8379/7698/F9_USAG-HI_Oahu_Training_PA_Signed_24AUG18_PUBLIC_RELEASE_VERSION.pdf">https://home.army.mil/hawaii/5915/8379/7698/F9_USAG-HI_Oahu_Training_PA_Signed_24AUG18_PUBLIC_RELEASE_VERSION.pdf</a>).</p>
<p>Ryan K. P. Kanaka’ole (Susan A. Lebo - SHPD)</p>	<p>State of Hawai’i Department of Land and Natural Resources</p>	<p>4. Gross et al. (2023) provide the following critical assessment, “5,248 acres of the total 6,322 acres of the State-owned lands have not been surveyed; thus, the presence of historic and cultural resources as well as previous impacts to those resources are unknown for these areas.” They further state, 46 historic and cultural resources are recorded within or partially within the ROI and include Traditional Hawaiian and historic (including military) sites, structures, and features and, to date, approximately 19% (1,277 acres) of the ROI has been subject to an archaeological survey, comprising 13 separate investigations. Based on this</p>	<p>Section 3.4.5 discusses the Army’s Cultural Resources program, including the State-owned lands. Previous archaeological surveys are provided in Table 3-23 and Table 3-25 of the EIS. The majority of the State-owned lands have been surveyed with the exception of steep slopes. Sections 3.4.5.1 (for KTA) and 3.4.5.3 (for MMR) have been revised to explain that the majority of State-owned lands used for ground training have been surveyed, and reasons why remaining areas</p>

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		assessment, SHPD argues that the “baseline” data provided for the State-owned lands is inadequate to support the USAG-HI’s assessment that anticipated environmental impacts to historic and cultural resources within KTA and MMR under Alternatives 1 and 2 is less than significant and that within Poamoho it is no impact.	are constrained. Poamoho is not used for ground training and is a heavily dissected, steeply sloping landscape.
Ryan K. P. Kanaka‘ole (Susan A. Lebo - SHPD)	State of Hawai‘i Department of Land and Natural Resources	5. Again, as indicated above, surveys have not been completed to assess the current condition of historic and cultural resources within KTA and MMR. Thus, it remains unknown which previously recorded resources have been impacted, the nature and severity of such impacts. Additionally, no data are provided assessing the adequacy of the best management practices (BMPs) implemented to avoid, minimize, or mitigation adverse impacts to individual or groups of resources within each ROI.	Sections 3.4.5.1 and 3.4.5.3 discuss the impacts to historic and cultural resources. Specifically, impacts to historic and cultural resources at KTA and MMR are described in Sections 3.4.5.1 and 3.4.5.3, respectively. As noted in Section 3.4.5.3, past impacts to historic and cultural resources are largely associated with physical impacts from live-fire activities which were suspended in 2004. Section 3.5.4.3 also notes that no adverse impacts associated with ongoing activities are recorded for historic and cultural resources within the State-owned land after live-fire training was suspended in 2004. Section 3.4.5.1 states that no significant beneficial or adverse impacts from current activities are recorded for historic and cultural resources known to be extant within the State-owned land at KTA.
Ryan K. P. Kanaka‘ole (Susan A. Lebo - SHPD)	State of Hawai‘i Department of Land and Natural Resources	7. Pursuant to the Programmatic Agreement (PA) (2018) [1 Programmatic Agreement Among 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 United States Army Training Areas and Ranges on the Island of O‘ahu, Hawai‘i (16 August 2018) ] SHPD requests the second draft EIS be revised to provide documentation of the efforts taken, and the results thereof, by the USAG-HI to complete archaeological surveys, historic property identification efforts, and evaluations of NRHP-eligibility since the PA was executed in August 2018 (Stipulation III.B.1 through III.B.4) and, if none have occurred to provide rationale why none were undertaken in accordance with the Programmatic Agreement or in	NRHP eligibility is not included in the EIS. The Army continues identification and evaluation efforts for potential NRHP-eligible resources, but Native Hawaiian consultations have not identified any on State-owned lands at KTA and Poamoho. Ongoing military training that would occur under any of the retention alternatives has already been subject to NHPA Section 106 consultation and does not require further consultation; this is also separate from the EIS analysis.  As noted in EIS Section 1.4, HRS Chapter 6E compliance is also separate from the EIS process.

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		<p>support of the proposed Army Training Land Retention of State Lands at KTA, MMR, and Poamoho Training Area EIS. The most recent archaeological survey referenced in the draft EIS is 2015.</p>	<p>The Proposed Action is an administrative action; no new activities are proposed. HRS 6E would be initiated by the State when there is a specific State agency action or a proposal for the State agency to consider. Until the EIS is completed, there is no specific action for the State agency to act on or consider. The EIS relies on existing studies to present what is known of current conditions, and the full summary is contained in the Historic and Cultural Resources Literature Review (Appendix I).</p> <p>The most recent KTA survey was conducted in 2015/2016, and the Army is awaiting funding to continue survey efforts.</p> <p>The majority of State-owned lands have been surveyed with the exception of steep slopes. Poamoho is not used for ground training and is a heavily dissected, steeply sloping landscape. Sections 3.4.5.1 and 3.4.5.3 have been revised to explain such.</p>
<p>Ryan K. P. Kanaka’ole (Susan A. Lebo - SHPD)</p>	<p>State of Hawai’i Department of Land and Natural Resources</p>	<p>8. Also pursuant to the Programmatic Agreement (2018) SHPD requests the second draft EIS be revised to provide documentation of the efforts taken by the USAG-HI and the results of the historic property condition assessments (Stipulation III.C.1 through III.C.2) conducted since the PA was executed in August 2018. Stipulation III.C. states that the Cultural Resource Manager (CRM) shall routinely assess the condition of select historic properties in training areas. As indicated above, these condition assessments are important in providing a baseline for evaluating the environmental impacts of the proposed action.</p>	<p>Sections 3.4.5.1 (for KTA) and 3.4.5.3 (for MMR) have been revised to explain that the majority of State-owned lands used for ground training have been surveyed, and reasons why remaining areas are constrained. Poamoho is not used for ground training and is a heavily dissected, steeply sloping landscape. The Army continues to conduct surveys as funding is made available prior to using land for training to fulfill NHPA compliance commitments.</p>
<p>Ryan K. P. Kanaka’ole (Susan A. Lebo - SHPD)</p>	<p>State of Hawai’i Department of Land and</p>	<p>9. SHPD supports comments provided by the Cultural Impact Assessment (CIA) interviewees regarding a desire for the USAG-HI to work with cultural practitioners to develop a mutually beneficial access plan for the entirety of the MMR that promotes engagement</p>	<p>Cultural access to U.S. Government-controlled lands is outside the scope of this EIS. As identified in Sections 3.1 and 3.5.5.3, the Army identified mitigation measures that includes working with</p>

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	Natural Resources	with cultural resources, practices, and beliefs, as well as promoting better long-term stewardship with the ‘āina with regard to military use of the land. Mahalo for the opportunity to comment. The SHPO looks forward to seeing our comments taken into consideration, with meaningful revisions made to the draft EIS. Aloha, Susan A. Lebo, PhD Archaeology Branch Chief Acting Administrator, State Historic Preservation Division	Native Hawaiian Organizations and cultural practitioners to update and/or develop a mutually beneficial cultural access plan within the State-owned land.
Edwin Sniffen (Natasha Torres)	Hawai‘i State Department of Transportation	<p>Subject: Draft Environmental Impact Statement (EIS)  Army Training Land Retention of State Lands at Kahuku Training Area,  Kawailoa-Poamoho Training Area, and Makua Military Reservation  Oahu, Hawaii  Tax Map Keys: (1) 5-8-002:002•, 5-9-006:026•, 7-2-001:006•, 8"001 008; 012(por.); 8-2-001: 001; 002(por.)•, 022; 024. 025</p> <p>Thank you for requesting the Hawaii Department of Transportation's (HDOT) review and comments on the subject Draft EIS. HDOT understands the United States Army Hawaii is proposing to retain State-owned lands at Kahuku Training Area, Kawailoa-Poamoho Training Area, and Makua Military Reservation on the island of Oahu, for which the leases will expire on August 16, 2029. The proposed action is a real estate action that allows the military to continue ongoing training and does not include construction or change in ongoing activities. HDOT has reviewed the Draft EIS and considering the proposed action and description, HDOT has no comments to provide.</p> <p>Please submit any subsequent land use entitlement-related requests for review or correspondence to the HDOT Land Use Intake email address at [REDACTED].</p> <p>If there are any questions, please contact Mr. Blayne Nikaido, Planner, Land Use Section of the HDOT Statewide Transportation Planning Office at [REDACTED] or via email at [REDACTED].</p> <p>Sincerely,  EDWIN H. SNIFFEN  Director of Transportation</p>	Please see General Response.

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Stacy Ferreira	Office of Hawaiian Affairs	<p>Lease term options</p> <p>Currently, there is no alternative proposing a shorter lease term. This question was proposed by OHA during the State agency meeting session on June 24. In response, Army staff indicated that minimally 25 years was needed, but that the DEIS was looking at how much land and not the “method” or duration of time in which the land would be retained. OHA finds this explanation inadequate as varying time durations would have varying degrees of impact on the land, which arguably needs to be meaningfully considered in the DEIS. 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 be afforded a full detailed environmental analysis. If there is a reason to dismiss 35 or 45 year lease options, than this must be fully explained in the DEIS.</p> <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 ordinances 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 State lands that would not be retained under the preferred alternative after decades of military use. In this regard, OHA believes the DEIS does not provide enough detail on lease expiration activities for lands not retained under the preferred alternative.</p> <p>OHA recommends that Alternative 2 include specific details and a possible timeline on lease expiration activities for unretained State owned lands.</p> <p>OHA believes the Army should not view a shorter-term lease option as punitive or some kind of mission hindrance; but rather, a better</p>	<p>Text has been added to EIS Sections ES.6, ES.12, 2.1, and 4.2 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>



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		<p>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>Stacy Ferreira</p>	<p>Office of Hawaiian Affairs</p>	<p>Cultural Impact Assessment (CIA) A CIA was prepared for this project by Honua Consulting per the Office of Environmental Quality Control (OEQC) Guidelines. The DEIS reports that it’s unclear if survey results for identified cultural practices are occurring directly within State-owned land. For KTA, ceremonial practices associated with iwi kūpuna (ancestral Native Hawaiian remains) were mentioned by several participants. The CIA concedes that not all burial locations may be known to the Army. Traditional resources gathering was also mentioned by a few individuals, including native plant gathering for lā’au lapa’au (traditional medicine practices) and canoe making. These areas of gathering were identified. The CIA goes on to mention that no cultural access requests were received for KTA in 2022. In regards to KPTA, concerns were shared regarding impacts to access and an inability to perform ceremonies. Practices identified included mālama ‘āina (caring for the land), kilo (observing the stars and environmental conditions), sharing mo’olelo (stories) and passing on knowledge. However, the CIA indicated that no direct connections to State owned lands were made. The CIA mentions that no cultural access requests were made in 2022. For MMR, recorded practices included fishing, plant gathering for lā’au lapa’au, pa’akai (salt) gathering, and trail access for canoe work. Again, the actual occurrence of practices on State owned lands was unknown. Concerns about access impediments due to unexploded ordinances (UXO) was also highlighted by interviewees for MMR. The CIA goes on to frame the Army’s cultural stewardship programs as beneficial for protecting resources and maintaining access. It is suggested that restoration work could be beneficial with minimal impacts. Given the level of uncertainty on findings in regards to practices and cultural resources on State lands, OHA recommends another round of outreach should be done, with perhaps more targeted questions regarding the location</p>	<p>The CIA (Appendix B) assesses the impacts on cultural practices within the broad geographical area, which is greater than the SOL.</p> <p>The Army has no record of denying requested access if safety protocols are followed. The Army's cultural agreement documents at this link provide more information:  <a href="https://home.army.mil/hawaii/garrison/dpw/cultural-resources">https://home.army.mil/hawaii/garrison/dpw/cultural-resources</a></p> <p>OEQC guidelines recommend a geographic extent beyond the identified or typical boundaries of the project area for Cultural Practices, which is defined as an ROI of a one-mile buffer around the State-owned lands (see Section 3.5.3). NEPA and HEPA do not require the ROI to extend outside the geographic project area of the Proposed Action for Historic and Cultural Resources, thus the focus on State-owned lands plus a 100-foot buffer (see Section 3.4.3 of the EIS).</p> <p>Section 3.6.5.3 has been updated with UXO cleanup/removal efforts at MMR.</p>

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		<p>of cultural resources and practice areas with possible site visits (if practical) . Further, OHA suggests that access statistics named to be provided for years not occurring during the pandemic . 2022, the year that is primarily cited, was perhaps a bad year to base access statistics on. Accessibility to access request processes and procedures are also unclear. OHA recommends that more detail is needed to describe specifically how access is obtained, with perhaps a CIA recommendation for an online portal link or app if one is not already available for cultural practitioners to improve accessibility . Feedback surveys post-visit could also help assess adequacy of access and overall care of cultural sites. As part of general CIA recommendations, OHA recommends that clearer timelines and goals for UXO removal be considered as part of lease terms for MMR; thus, providing leverage for clean up enforcement.</p>	
Stacy Ferreira	Office of Hawaiian Affairs	<p>HRS 6E Coordination The DEIS indicates that the HRS 6E process will follow the EIS process and that HRS 6E rules do not apply to EIS documents. While OHA does recognize that the State level processes for HRS 6E and 343 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. This is commensurate with Federal level guidance on National Historic Preservation Act (NHPA) coordination. 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 State Historic Preservation Division (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. Hawai’i</p>	<p>Section 1.4.3 clarifies that this EIS complies with the requirements of NEPA and HEPA. The proposed action is an administrative action which complies with NHPA Section 106. Ongoing military training that would occur under any of the retention alternatives has already been subject to NHPA Section 106 consultation and does not require further consultation. Section 3.4.5 discusses that there is no Section 106 consultation on KTA State-owned land beyond the O’ahu PA.</p> <p>As noted in EIS 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. HRS 6E would be initiated by the State when there is a specific State agency action or a proposal for the State agency to consider. Until the EIS is completed, there is no specific action for the State agency to act on or consider. The EIS relies on existing studies to present what is known of current conditions, and</p>

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		<p>Administrative Rules (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 fully identified as the statutory process to identify these environmental components is 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 mitigations from this statutory process cannot be included in environmental review documents if HRS 6E is not completed first. OHA thus questions the completeness of any environmental review for projects that have not yet undergone HRS 6E review. 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 would be foreclosed, our beneficiaries would not be fully informed on the proposed action when environmental review documents are specifically provided for comment. Thus, OHA recommends that the draft EIS (DEIS) demonstrate HRS 6E compliance in a way that ensures historic properties are properly identified. and mitigation provided for any adverse impacts . Further, if not done so already, OHA encourages consultation with the SHPD as soon as practicable and for the DEIS to include a timetable for HRS 6E compliance. National Historic Preservation Act (NHPA) Compliance The DEIS indicates that there will be no new NHPA Section 106 consultation for the proposed ATLR given the administrative nature of the lease extension and existing NHPA Section 106 mitigation agreements (i.e., 2018 Programmatic Agreement for KTA, various MOAs for MMR). For clarity, OHA recommends that a table or bullet points be added that shows specific Tax Map Keys (TMKs), training activities, and respective NHPA coverage/mitigations from existing</p>	<p>the full summary in contained in the Historic and Cultural Resources Literature Review (Appendix I).</p> <p>Section 3.4.5 describes the Army's responsibilities for cultural management under the agreement to minimize impacts to sites.</p> <p>The ongoing Army activities described in 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.</p>

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		<p>agreements. OHA believes this is necessary to address perceived inconsistencies with NHPA mitigation agreement dates and the years in which certain types of training were established. For example, the training for “unmanned aerial systems” (UAS) at KTA appears to has been established in the 2019 O’ahu UAS Training Record of Consideration, yet the Programmatic Agreements (PA) cited was executed in 2018. Thus, it is unclear how the PA specifically covers the inclusion of any new training activities established in 2019 or if pre-existing language for unmanned vehicles is sufficient. In another example, it is not clear if “assembly area operations” and “combined company arms assault course” training/activities at MMR are clearly covered under existing MOA agreements that are cited in the DEIS. For KTA and MMR areas, the DEIS claims that “beneficial impacts have occurred” from respective cultural resource programs and that general cultural awareness amongst soldiers has arisen. It is implied that cultural resources within areas of active military use result in “more frequent and robust cultural resource protection and management efforts”. To demonstrate this, it appears to OHA that the DEIS section for MMR provides clear bullet points for cultural resource activities and subsequent past NHPA agreement documents; however, the KTA section does not have such specific bullet points. Rather, readers are referred to a 2018 PA and Standard Operating Procedures (SOPs) in the Integrated Cultural Resources Management Plan (ICRMP) for KTA. For consistency and clarity, OHA recommends that the DEIS clearly detail with bullets or a table what specific cultural resource activities are at KTA and what NHPA mitigation agreement condition(s) or document(s) they are tied to as was done with the MMR section of the DEIS .</p>	
Stacy Ferreira	Office of Hawaiian Affairs	<p>Biological Resources The DEIS states that there will be no new Endangered Species Act (ESA) Section 7 consultations as the ATLR is an administrative action and in consideration of previous US Fish &amp; Wildlife (USFWS) Biological Opinions (BO) completed over the years as part of ESA compliance for existing military activities. The DEIS goes on to provide tables for each area that show ongoing species</p>	<p>Tables 3-7, 3-13, and 3-21 in the Final EIS have been updated to show which actions have been completed and which are ongoing. The current consultation process for the programmatic Biological Assessment, a Federal process, is ongoing and is not a part of this EIS process;</p>

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		<p>management activities and the respective BO that they are following. Given that all of these BOs are over a decade old, OHA recommends that the DEIS demonstrate that any training activities that post-date the BOs are appropriately being mitigated from possible impacts to endangered or threatened species and critical habitats . As an example (and as was detailed in the previous section), it appears UAS training is a fairly recent development established in 2019. Further, the Army is said to be preparing a Programmatic Biological Assessment (PBA) in consultation with USFWS to cover listed species and critical habitats with full consideration of Army training and operations. The PBA would then supersede all previous USFWS BOs. Given the specificity and emphasis in the DEIS regarding each BO, it is perhaps a little concerning that they will soon be replaced by the PBA. OHA recommends that the DEIS 1) detail where changes may be made between the PBA and Bos; and, 2) provide assurances that the PBA will incorporate existing BO activities . Failing to disclose possible differences between the PBA and BO may arguably undermine the integrity of information provided to the general public for comment as part of the HRS 343 process. A timeline should also be provided for execution and implementation of the PBA . Its also unclear to OHA if existing biological surveys and BOs obtained knowledge from cultural practitioners (with vast generational knowledge on cultural resources in training areas). It is clear from the DEIS’s CIA that cultural practitioners are indeed utilizing plants and fauna in the area for cultural practices. OHA recommends that any prior or ongoing consultations with Native Hawaiian cultural practitioners in regards to BO activities and development of the PBA be summarized in the DEIS . Additionally, consultation with the DLNR’s Division of Forestry and Wildlife (DOFAW) should be occurring (or should have already occurred) as part of development of existing BOs and the forthcoming PBA. Per DOFAW’s mission statement, they “protect, manage, and restore natural and cultural resources in collaboration with the people of Hawai’i”; thus, they have a vast wealth of knowledge that could be useful to the Army. OHA</p>	<p>therefore, the conservation measures that may be associated with the new programmatic Biological Opinion and how they differ or replace the existing Biological Opinions cannot be known at this time and are beyond the scope of this EIS.</p> <p>UAS training is analyzed within the draft programmatic Biological Assessment.</p> <p>The Army strives to work closely and coordinate with Division of Forestry and Wildlife. At a project-specific level, the Army collaborates with all appropriate agencies on natural resource conservation program actions. An ESA Section 7 consultation is a Federal process between the Army and the Regulating Agency.</p>

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		<p>recommends that any consultation with DOFAW be discussed within the DEIS as it relates to past BOs and forthcoming PBA . Comments and concerns from DOFAW are important as they are the State’s experts regarding this environmental component.</p>	
Stacy Ferreira	Office of Hawaiian Affairs	<p>Ceded Land and Conservation District Considerations In regards to OHA’s own trust responsibilities, we have a vested interested in ceded lands that are part of the public land trust. Per the State of Hawai’i Constitution. Article XII, Sections 5 and 6, the OHA trustees exercise their power “to manage and administer the proceeds from the sale or other disposition of the lands, natural resources, minerals, and income derived from whatever sources for native Hawaiians and Hawaiians, including all income and proceeds from that pro rata portion of the trust referred to in section 4 of this article for native Hawaiians...” [3 See State of Hawai’i Constitution, Article XII, Sections 5 and 6.] Affirmation of OHA’s public trust duties our further captured in Hawai’i Revised Statutes (HRS) Chapter 10 to assess the practices of other agencies and advocate where necessary to make recommendations that limit or eliminate potential irrevocable harm to cultural resources and the public land trust. As such, OHA must be consulted as part of the easement acquisition process as well as the land valuation process and included in discussions with the DLNR . We advise that the DEIS include direct mention of this process and the procedures for land valuation. Previously, OHA opted not to participate in cultural impact assessment (CIA) consultations for this project in June 2022 as it was unclear if the Department of Land and Natural Resources (DLNR) had been actively conducting periodic monitoring and site visits of these lease areas as an essential component of the State's duty to protect and preserve trust land. At the time, it also appeared that OHA was not invited to comment on the EIS Preparation Notice (EISPN) for ATLR. As part of our decline to participate in the CIA, OHA made clear that the State has an obligation to reasonably monitor a third party’s use of the property. To hold otherwise would permit the State to ignore the risk of impending damage to the land, leaving trust beneficiaries</p>	<p>The Final EIS has been updated to include information on State site visits and inspection reports of the lands leased to the Army. See Section 3.2.5 for additional details. Links to the inspection reports and ECOPs have been added to Chapter 5 of the EIS as well as the O’ahu EIS website (<a href="https://home.army.mil/hawaii/oahueis/project-home">https://home.army.mil/hawaii/oahueis/project-home</a>) under the “Documents” tab.</p> <p>The Proposed Action does not include a defined land retention duration for lease or easement for long-term use because that negotiation process would occur with the State following completion of the EIS. Details including timing for the petition of a subzone and land valuation is outside the scope of this EIS.</p>

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		<p>powerless to prevent irreparable harm before it occurs. This is especially true for lands with UXOs. Procedurally, the DEIS should address any possible concerns noted by the State via an independent inspection; in turn, the public would be allowed to comment via the HRS 343 process on how these deficiencies are being corrected or not. As you may be aware the Pōhakuloa Training Area (PTA) on Hawai’i Island had a Environmental Condition of Property (ECOP) report prepared in 2015. More recently military use of State lands at PTA was challenged in court (see Ching v Case) over the matter of oversight and inspection of State leased lands. In 2019, the court ordered the DLNR to prepare a management plan that must include provisions for periodic monitoring of these lands as to ensure fulfillment of State trust responsibilities. OHA would assume that provisions for the State to independently conduct periodic monitoring and site visits at PTA would apply (or could be applied) to other State lands leased by the military for similar training purposes that included past or present live-fire training. The DEIS should make clear any site visits done by DLNR, inspection records (i.e., ECOP), and corrective actions (if any). Conservation District In regards to conservation district use, it would appear that the DEIS is proposing that the Army will be exploring a petition for a rule amendment to create a special subzone. During the June 24th State agency meeting, Army staff indicated that consultation with DLNR’s Office of Conservation and Coastal Lands (OCCL) was ongoing and that an administrative rule change would be difficult. Given the complexities of this project and the administrative rule change process, OHA recommends that any OCCL consultations/comments/concerns and the rule change process be elaborated upon fully within the DEIS with a projected timeline for completion for conservation district use compliance. Absent such detail, the Army’s proposed actions in the conservation district are arguably non-compliant and the general public does not have the ability to assess any mitigations for non-compliance as part of the HRS 343 process. Per HAR 13-5-13, the resource subzone is to “ensure, with proper management, the sustainable use of the</p>	

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		<p>natural resources of those areas. ...”. Arguably, it is unclear how a military special subzone would impact other nearby resource subzone areas not utilized by the military. Essentially, you would have discontinuous resource subzones. The impacts of creating a special subzone on other nearby resource subzones should be fully detailed within the DEIS .</p>	
Stacy Ferreira	Office of Hawaiian Affairs	<p>Recordation of Comments HAR 11-200.1-24(s)(1) states that a DEIS shall include “reproductions of all written comments submitted during the consultation period required in section 11-200.1-23.” Typically, state level DEIS’s or DEA’s will provide copies of all written comments as they were originally received. OHA believes that while some agencies sometimes opt to recreate or summarize comments in their own formats, the intent of the rules is to include actual copies to demonstrate that comments were unaltered and applicable to the public scoping or early consultation process for HRS 343 compliance. As such, please include unaltered copies of any written comments received as part of the DEIS and EISPN comment periods.</p>	<p>Reproductions of all written comments submitted during the scoping period are included in the Draft EIS Appendix M-1. The Final EIS includes, in Appendix M-2, reproductions of all written comments submitted during the scoping period and Draft EIS public comment period.</p>
Ernest Lau	Board of Water Supply	<p>Thank you for your letter regarding the land retention proposal. The Board of Water Supply (BWS) does not have a water system serving and in the areas around the Army training lands. All water services should be provided by the private water systems servicing the area. For your information, the BWS has four source wells along the northern boundary of the KTA parcels. All proposed developments shall verify with the State Department of Health regarding wastewater disposal systems that are allowable within the "no pass zone". Ground disposal of wastewater could detrimentally impact the underlying freshwater aquifer. If you have any questions, please contact Daniel Koge, Project Review Branch of our Water Resources Division at [REDACTED].</p>	<p>The Proposed Action is a real estate action (retention of the State-owned lands) and does not include construction or changes to ongoing activities conducted within the State-owned lands retained. No ground disposal of wastewater is occurring within the State-owned land from military activities conducted at KTA. There is wastewater disposal through a leach field on the Cantonment on U.S. Government-controlled land.</p> <p>As stated in Section 3.10.5.1 there is limited data for groundwater quality for State-owned land at KTA because groundwater is not being withdrawn from from the State-owned land due to the absence of monitoring wells within the aquifer. According to DOH Safe Drinking Water Branch groundwater contamination maps, no wells with</p>



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			contamination exist within at least 5 miles of the State-owned land at KTA.
Glenn Hayashi	Honolulu Police Department	<p>Good Afternoon. Please refer to the attachment for HPD's comments regarding the subject projects. Mahalo, Lynelle Stone Administrative Operations Honolulu Police Department To Whom It May Concern: This is in response to your correspondence requesting input on the Draft Environmental Impact Statement regarding the Army Training Land Retention of State Lands at Kahuku Training Area, Kawaioloa-Poamoho Training Area, and Mékua Military Reservation. Based on the information provided, the Honolulu Police Department does not have any concerns at this time. Thank you for the opportunity to review this project. If there are any questions, please call Management Analyst Emily Ogasawara of our Support Services Bureau at (808) 723-3751. Sincerely, GLENN HAYASHI                      Assistant Chief of Police Support Services Bureau</p>	Please see General Response.
Kurt Fevella	Hawai'i State Senator Kurt Fevella, District 20	<p>Thank you. My question is tonight for you. Hawaii is at war with anybody? That would be the question. No. Hawaii is not at war with anybody, so why are we having the most training grounds for war? We never had or ever declared war with any other country or any other people. Why are we training to kill, not only kill, but even steal and of course the famous one is destroyed? . . . . So I say this, yeah, I am totally against this whole extended lease that the State do not even have permission from anybody here to lease any of the land. They are supposed to be caretakers. They're really caring for our land, yeah? Doing a great job. Negative. They don't have the authority to be leasing land anymore to you guys. Whatever what happened back in the war days or whatever, us guys being frightened or whatever the situation, yeah, because the big boogeyman was going to come attack us. Well, the boogeyman is no -- no more already. The military is the boogeyman. Okay? . . . . The United States Military is the biggest bully. They don't ask. They take. You just heard -- I got educated tonight from my family from Makua and Waianae. I never knew you could go over there, and you guys get so many hours to get so many hours to get your</p>	Please see General Response.

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		<p>property out of there. I know the new family, yeah, going forward. . . . . By going forward, I just, I understand that they -- they sent you here and I'll tell you this. As much as you take in all of this and I respect you, you're doing an injustice. . . . . The reason for the whole song and dance is that you guys can go back to the State and Land Use Commission and all of these guys said check the box, negative. We don't want to extend the lease at Makua and you guys need to know that. You guys need to be good stewards of the land like you guys said you guys are and be gracious to the host family who is us, that hosted you enough, and leave. . . . . You know, I -- I understand that they only sent you for whatever reason. The rest of the people are probably cowards, yeah, hiding behind a desk. But the bottom line is we need to have better-- not saying that you're not -- better representation of the leaders. Because you know why I say this? When -- when it comes to military, by the time it gets to the guy on the top, done he not going to hear none of this all of this what you guys just heard. You know, the wahine when she went to Japan with her husband and felt ill? . . . . . Again, sir, we're connected to the aina. When she had to leave, that was the feeling she had and every other Hawaiian that goes to the continent feels. You never have that feeling because I'll never go to your property or your state or your island where you stay and evict you guys. I get 10 more minutes. I was counting the other guys. Just -- just joking. But the bottom line is, as she said, I came here as Kurt Fevella, but I am a state senator, and I know you guys got my letters because I am for no more lease extensions to none of the establishments that we have. . . . . Okay. One more before I leave. You can answer this or not. Do you know where Pearl Lagoon is? Do you know where Pearl Lagoon is? Where? Pearl Harbor. That was the most place that you get food, everything. The Hawaiians was -- was flourishing with these things and guess what happened? They dredged it. They made tombstones for people. . . . . Again, an act of war, finishing up on the Japan situation. Hawaii was never in war with Japan. America was. That's the reason why they had to respect not to kill everybody from Kolekole Pass all the way to Pearl</p>	

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		<p>Harbor. Sad to say three of our residents did die, but they didn't intend to kill civilians. . . . Just remember this, when we dropped the bomb, we intended to kill civilians. America, the biggest bully. Thank you.</p>	
Kurt Fevella	Hawai'i State Senator Kurt Fevella, District 20	<p>Tonight, different place, different time. You guys not listening. Nobody there. Nobody here. So I'm turn around, I got a lot of brothers and family, to the people actually listening. Dawn Chang is our sell out. She had a chance to kill this in a board meeting. I couldn't attend that meeting. But it was all trickery. She never tell you guys and our neighbor island guys that she had an appointment with them at that meeting at 2:00. And everybody came from the neighbor island of crack of dawn. I couldn't because I was in committee hearings to be there. I wanted to be there. But then I was getting texts from her own board members on the tragedy that she was trying to underhand do in front of their members. Because all of you left, because you guys all get lives. They had to go back to neighbor islands, because they get lives. She was trying to do leasehold land, tried to force them to give her the executive permission to go ahead and do this deal without us. That's the reason why I wrote the letter to the governor, and I asked the governor to kick her out, to have her resign, because she does not resent (sic) -- represent the people that she said she is. Just because she get the blood kakou doesn't mean she representing us, because she not. So we went take to the streets and sit down with Dawn Chang, because she could have stopped all of this. You guys don't have to have been here. Keep to the promise of 2029 and be gone. There's nothing that they do in our lands that was great, nothing. You guys suffering from the devil weed? Who brought that? Hawaiians? No. Their machines, their helicopters, their soldiers in their shoes. How I know this? Because when I first got there, that was Senator Kai Kahele, water and land, tried to figure out how we could help them get rid of this because we couldn't figure it out. They was not going to take care of that. If anybody noticed, this is the most flammable -- flammable weed out there. And guess where it grows? On areas</p>	Please see General Response.

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		<p>that we cannot reach, because we don't have helicopters. So how are we going to get it -- take those invasive species out, get rid of them? The guy came over here talking about Russia and -- sorry, I was going to read that, but forget it already -- and Russia and Germany. None of them would come over here because they still, to this day, each country still recognize Hawaii as a nation. The only one don't recognize us is the United States. This is not the United States. This is the Hawaii nation. It's our place. They're visitors, and their visitor pass has ended. They need to leave. Okay. Then you guys, like, say, oh, no, right? Military like say no. These guys will come, Saddam Hussein. Forget what president already -- he said this. Go google him. Saddam Hussein told the president: When you unoccupy Hawaii, I will unoccupied Kuwait. This is from a former dictator that died by their hands that respected Hawaii that much. Every single country. Japan. We was not war with Japan. The United States was at war with Japan. When Japan came here, they never took any Hawaiian lives. I say like that last night at the Waianae meeting, three tragedies from my community of a camp accidentally got and passed away, three of them. It wasn't deliberate. When we bomb Japan, we was deliberate in putting them to their knees by killing private citizens. That's why they went -- they went surrender because we was murdering them. Time after time, bullies, United States. Every country, every place they went, they bully. Last night, I only learned something so much that I could not sleep last night, that those Makua families was threatened by military to move within hours. Who does that? What country does that? America. But we, again, we need to educate ourselves. We all need to tell the governor to fire Dawn Chang, put our people in, make sure they protect the aina like they said, deal or no, yeah, said they're gonna take care of this. They're not. They're lying. Like how the other uncle came up and said, pretty much a done deal, yeah. Only way it gonna be a done deal, if we lay down. But we need to take to the streets. I'm gonna do them. I just was talking to -- oh, she knows. She went out. I was just talking to Melissa. I live and breathe for that in front of the capitol. Whether it</p>	

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		<p>gets one of me or 10 of me, it doesn't matter. Dawn has to go. This lease, the trickery -- they said leases, right? No, that's not what they gonna call them. They gonna call them something else, right? Retention. So when I told Melissa and I told my family in Waianae, I never know about the meeting. I wrote an opposition letter. I never get no alert. You know why? They put them under retention and not leases. So my staff didn't pull it for the leases, because I told them watch when these meetings come up for lease extensions, because we're gonna stop them. We don't want it. Dawn could have done her job and said: You know what? We gonna to hold you guys to your promise. We not gonna have these lease extensions or land, whatever they call them, and done. But because somebody -- you gotta understand, Dawn is a puppet. She's a puppet. Some people are not gonna believe that. You know, I know she from the community around here. But she's a puppet to the governor. That's the reason why she doing this. The governor already, like they said, is already toasting champagne and caviar. We need to make sure the governor hears us, Dawn -- lose money -- Chang, and down with her, because you guys are important. When I was driving into Kahuku from Ewa Beach, I went this way. I see the desecration of these ugly windmills that we got sold out. That's the governor calling me. I guess you heard it complaining about him. But the bottom line is look what's happening to this community. When is it enough? You guys need to heal and take time to heal. We still never heal from the windmills, and then now you gonna desecrate more? Negative. Negative. So I ask you guys, whenever it's time, let's take to the streets. Down with Dawn Chang. If we gotta go march her house -- I don't know her address, but we can find out -- we'll go out there, and down with Dawn Chang. Thank you guys.</p>	
Amy Perruso	Hawai'i State Representative Amy Peruso, District 46	To whom it may concern, As a dedicated representative of my community and an advocate for the protection and restoration of these lands, I am compelled to address the findings of the Draft Environmental Impact Statement (EIS) concerning three parcels, focusing specifically on the Poamoho Training Area. The analysis	Please see General Response.

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		<p>presented in Sections 2.2.3, 2.3.2.2, and 3.2.5.2 provides critical insight into the current use and management of Poamoho, and underscores the necessity for significant change in how these lands are utilized and overseen. These changes are only possible if and when these lands are returned back to the state to hold in trust for the Hawaiian people, so I oppose renewal of these leases.</p> <p><b>Cultural and Environmental Significance</b> The Poamoho area is steeped in cultural significance and ecological value. The fenced conservation areas within Poamoho are crucial for protecting endangered resources and natural communities from ungulates. However, the military's periodic low-aviation training exercises over these lands disrupt the sanctity and ecological balance of the area. Despite prohibitions on digging and pyrotechnics, the mere presence of military operations undermines the spiritual and environmental integrity of Poamoho.</p> <p><b>Socioeconomic and Legal Considerations</b> The continued military presence on state-owned lands like Poamoho, governed by outdated leases from 1964, perpetuates historical injustices against Native Hawaiians. The lack of U.S. Government-owned assets at Poamoho further emphasizes that the land’s primary value lies in its natural and cultural resources, not in its military utility. Returning these lands to state control and placing them in trust for the Hawaiian people would allow for more equitable and beneficial use, fostering community-led conservation and cultural preservation efforts.</p> <p><b>Encroachment Management and Scenic Views</b> Poamoho serves as an important buffer for training activities at Schofield Barracks East Range (SBER), but this role should not overshadow the environmental and cultural degradation resulting from continued military use. The steep terrain and dense vegetation of Poamoho offer panoramic views and recreational opportunities, which are restricted by military control.</p> <p><b>Conclusion</b> The Draft EIS for Poamoho underscores the need for a paradigm shift in land management that prioritizes cultural preservation, environmental protection, and socioeconomic equity.</p>	

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		Ending military leases and returning Poamoho to state trust will honor the land's true value and foster a sustainable future for Hawai'i and its people. The recommendations outlined towards that end provide a path forward that respects the cultural, environmental, and economic needs of the Hawaiian community, ensuring that Poamoho, along with the other important lands involved in the lease negotiation process, remain cherished and protected landscape for generations to come. Sincerely, Amy Perruso Hawai'i State Representative, District 46	
Amy Perruso	Hawai'i State Representative Amy Peruso, District 46	Inadequacy of Current Use The EIS notes that Poamoho's rugged terrain and dense vegetation make it a vital area for aviation training, particularly for low-altitude helicopter operations. However, the limited scope of training (restricted to aerial maneuvers without ground training for over a decade) begs the question of the necessity of ongoing military retention of these lands. The State maintains critical infrastructure, including hiking trails and conservation areas, which are underutilized due to military restrictions	Section 2.5 of the Final EIS has been revised to state the No Action Alternative is identified as the Preferred Alternative for Poamoho (i.e., the State-owned land at Poamoho would not be retained). Although the training at Poamoho is limited compared to other areas, the Army still needs to conduct that training. The final alternative selection would be made in the ROD, and therefore the Army is continuing to carry the action alternatives forward in the Final EIS.
Amy Perruso	Hawai'i State Representative Amy Peruso, District 46	Specific Concerns with Alternatives Alternative 1: Full Retention Under this alternative, the Army would retain all state-owned land at Poamoho (approximately 4,390 acres) and continue all current training and management activities. This alternative poses significant risks to cultural sites and environmental resources, as the military retains full control and access, potentially perpetuating the disruption and degradation of these critical areas. The continuation of military activities under this alternative is not compatible with the State's conservation district regulations and public trust responsibilities. Alternative 2: Modified Retention This alternative involves the retention of approximately 3,170 acres of state-owned land, excluding the Proposed Natural Area Reserve (NAR) Tract. While this reduces the area under military control, it still allows significant ongoing military activities, including aviation training. The state's assumption of management responsibilities for the NAR Tract is a positive step but does not fully address the	Section 2.5 of the Final EIS has been revised to state the No Action Alternative is identified as the Preferred Alternative for Poamoho (i.e., the State-owned land at Poamoho would not be retained). Section 2.3.3.1 has been revised to clarify that airspace use is independent of land retention, and aviation training would continue over land not retained. Although the training at Poamoho is limited compared to other areas, the Army still needs to conduct that training. The final alternative selection would be made in the ROD, and therefore the Army is continuing to carry the action alternatives forward in the Final EIS.

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		<p>broader issue of military occupation of culturally significant lands. Existing Conditions and Environmental Consequences Existing Conditions – Poamoho Poamoho is bordered by U.S. Government-controlled land to the south and a mixture of state- and privately-owned lands to the west and northeast. The surrounding land is largely undeveloped and part of the ‘Ewa Forest Reserve. The area lacks housing and resident population, emphasizing its natural and undeveloped state, which is crucial for conservation and cultural practices.</p>	
Amy Perruso	Hawai’i State Representative Amy Peruso, District 46	<p>Environmental Consequences – Poamoho The Draft EIS highlights the potential for long-term adverse impacts associated with military use of land in the conservation district, incompatible with state objectives and public trust purposes. The proposed retention under both alternatives would generate revenue but continue the adverse impacts on land tenure and the conservation district's goals</p>	<p>Compliance with HAR Chapter 13-5, Conservation District is discussed in Sections 1.4.3 (Table 1-2), 3.2, and 4.3.2 (Table 4-3). Section 4.3.2 has been revised to make clear that, "it is recognized that there is a trade off between the revenue generated by a lease or purchase and the conservation value of the land if the Army leases were to lapse in 2029. For analysis purposes, this 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>
Amy Perruso	Hawai’i State Representative Amy Peruso, District 46	<p>Analysis of Cumulative Impacts The DEIS improperly limits the scope of its cumulative impact analysis by not fully integrating the use of both state and federal lands. This segmentation prevents a comprehensive understanding of the broader environmental and cultural impacts. The Army's activities across O’ahu, including KTA, MMR, and Poamoho, should be evaluated as interconnected actions, as required by Hawai’i Revised Statutes (HRS) Chapter 343. The exclusion of federal land use impacts in the DEIS undermines the assessment of significance. For example, hazardous substances on federal lands can affect adjacent state lands and communities, a critical omission that skews the analysis of potential environmental risks.</p>	<p>The cumulative impact analysis for each resource area in Chapter 3 of the EIS addresses past and ongoing activities on the three O’ahu training areas containing State-owned lands. The EIS also assumes that training activities that currently occur on State-owned lands that would not be retained would shift to nearby U.S. Government-controlled lands (where possible), and addresses these impacts. As stated in Section 3.6.3, the ROI for Hazardous Substances and Hazardous Waste resource area in the EIS includes surrounding lands, particularly within a 100-foot buffer. Where</p>



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			there is a combined impact from the use of State-owned lands in combination with use of adjacent U.S. Government-controlled land, the combined impact is described. An example is noise impacts at KTA as described in Section 3.8.
Amy Perruso	Hawai'i State Representative Amy Peruso, District 46	Insufficient Disclosure of Cleanup and Contamination The DEIS fails to adequately address the extent to which lands will be cleaned up post-lease. The Army's historical lease terms are vague, and compliance with CERCLA does not guarantee full remediation. The DEIS must disclose the technical and economic feasibility of decontaminating the land, including any limitations that might prevent thorough cleanup. The ongoing contamination of ecosystems, particularly in Mākua, poses severe risks to local subsistence practices and the health of communities relying on these resources. The DEIS's current approach does not provide a clear plan for addressing these contamination issues.	Section 4.2.4 in the Final EIS discusses the reasons why the lease compliance actions and cleanup and restoration activities after lease expiration, and any associated impacts with such activities, are not able to be determined at this time. The technical and economic feasibility of any lease compliance or cleanup actions after lease expiration are outside the scope of this EIS.  Text added to the Environmental Consequences discussion under Section 3.6.5.3 stating " that the Army conducts routine range management activities to ensure that no materials, including debris, trash, and brass are left behind following all training exercises.
Amy Perruso	Hawai'i State Representative Amy Peruso, District 46	Assessment of Cultural Practice Impact The DEIS's assessment of cultural impacts is inadequate and disingenuous. The proposed mitigation measures, such as updating cultural access plans and public education campaigns, do not sufficiently address the long-term loss of land and cultural disconnection experienced by Native Hawaiians. The methodology used to assess cultural impacts is flawed, often discounting significant concerns raised by community members.	Section 3.4.5 describes existing management measures for cultural resources within Army training areas. Section 3.5.5.3 provides a summary of Native Hawaiian beliefs obtained from interviewees and survey respondents. These informants noted the sacredness of Mākua. 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 B.
Amy Perruso	Hawai'i State Representative	Need for Further Survey of Historic Sites The DEIS concedes that significant portions of MMR state lands remain unsurveyed, leaving many historic and cultural resources undocumented.	Section 3.4.5.3 has been updated with new Figure 3-15 showing the cultural resource survey coverage area at MMR. The majority of SOL have

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	Amy Peruso, District 46	Comprehensive surveys are essential to fully understand and mitigate the impacts of military activities on these sites	been surveyed with the exception of steep slopes. The Army continues to conduct surveys as funding is made available prior to using land for training to fulfill NHPA compliance commitments.
Amy Perruso	Hawai‘i State Representative Amy Peruso, District 46	Secondary Impacts and Socioeconomic Considerations The DEIS does not adequately disclose the secondary impacts of changing land use laws to accommodate military purposes. The proposed rulemaking and permitting processes must be fully assessed to understand their potential widespread effects on conservation and agricultural lands.	Section 1.4.3 (Table 1-2) has been revised to clarify assumptions of a rule amendment for the conservation district. Secondary and cumulative impacts that could result on land use are discussed in Section 3.2.6, but only in the context of the State-owned lands at KTA, Poamoho, and MMR.
Amy Perruso	Hawai‘i State Representative Amy Peruso, District 46	Moreover, the DEIS fails to consider the socioeconomic impacts of military land retention on affordable housing availability. Military housing allowances and cost of living adjustments place military personnel at a competitive advantage, exacerbating the housing crisis for local residents.	Sections 3.11.5.1, 3.11.5.2, and 3.11.5.3 discuss KTA, Poamoho, and MMR socioeconomic conditions, respectively. These sections discuss the housing supply for the three areas and note that demand for these areas shows a deficit. Because the Proposed Action does not include the relocation of any additional soldiers or civilian employees to Hawai‘i, the situation of housing affordability and availability would not be affected by the Proposed Action.
Amy Perruso	Hawai‘i State Representative Amy Peruso, District 46	Greenhouse Gas Emissions and Native Species The DEIS's approach to assessing greenhouse gas emissions is fundamentally flawed, relying on global comparisons rather than a focused analysis of local impacts. The significant contributions of military operations to GHG emissions must be transparently evaluated.	The Proposed Action is a real estate transaction (i.e., administrative action), and there would be no additional fuel consumed or miles driven. Therefore, no new air emissions or changes in emissions would occur, and no further analysis beyond the qualitative air quality and climate change analysis presented in Section 3.7 of the EIS is necessary. Section 3.7.4 explains why a quantitative, full life-cycle analysis of greenhouse gases (GHGs) has not been performed, and this text has been further clarified in the Final EIS. Section 3.7.5 provides a qualitative analysis of the direct and indirect greenhouse gas emissions from the Proposed Action alternatives. HEPA does not

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			require a quantitative analysis of greenhouse gas emissions. Text has been added to Section 4.2 (incomplete information/ unresolved issues) to discuss the lack of new emissions that would trigger a quantitative analysis of GHG emissions and associated social costs of carbon as well as the reasons for proceeding without such an analysis.
Amy Perruso	Hawai'i State Representative Amy Peruso, District 46	Additionally, the DEIS inadequately addresses the impacts on native species, particularly those sensitive to noise and habitat disruption. Poamoho is home to multiple critically endangered and vulnerable species that are also dependent on the proper conservation of critical habitat. The assertion that wildlife becomes habituated to noise is unsupported by comprehensive evidence and contradicts existing research on the detrimental effects of anthropogenic noise on wildlife. Full or partial retention of the land at Poamoho would continue to neutralize decades long conservation efforts of critical habitat and strip away the opportunity to expand natural area reserves that protect our native species.	Additional noise studies that address impacts on native and protected species have been included in Sections 3.3.5 and 3.8 of the Final EIS.
Amy Perruso	Hawai'i State Representative Amy Peruso, District 46	Recommendations 1. Terminate Military Leases: End all military leases at Poamoho, Mākua and Kahuku, upon their expiration, with no extensions or renewals. This action is essential to restore the land to its rightful custodians and align with the public trust doctrine. 2. Transfer to State Trust: Return Poamoho, Mākua and Kahuku to state control, managing the land in trust for the benefit of Native Hawaiians. This transfer will honor historical and cultural commitments and facilitate community-led stewardship.	Please see General Response.
Amy Perruso		3. Environmental Restoration: Hold the military accountable for environmental remediation, including the restoration of native habitats and ensuring clean water resources. This responsibility includes addressing any hazardous substances found during compliance reviews.	Section 2.5 identifies the preferred alternative, and Section 3.2 includes assumptions on how the State would hold public trust lands.
Amy Perruso		4. Cultural and Community Engagement: Involve Native Hawaiian communities in the planning and management of Poamoho, Mākua and Kahuku, ensuring that traditional practices and cultural heritage	Section 3.12.5, Table 3-58, and Appendix L describe public engagement efforts involving the Native Hawaiian Community.

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Cedric Gates	Hawai’i State Representative Cedric Gates, Distric 45	<p>are preserved and promoted. Community-led initiatives should be prioritized to restore and maintain the cultural integrity of the land.</p> <p>Can you hear? Okay. Aloha, my kakou. My name is Cedric Asuega Gates. I'm a lifelong native of the beautiful Waianae Coast. I'm born and raised makaha boy. . . . . I'm here to stand with my community of 96792 to testify on behalf of the 25,000-plus residents that I'm honored to represent to tell the military that Makua Valley should not be retained by the U.S. Army, especially after 2029, and should be restored and cleared of all UXOs and be returned to its rightful people, our community of Waianae. . . . . As the representative of 96792, every year I introduce legislation to return Makau back to our people because it's obvious that it's the pono thing to do. But we haven't seen the support for the bill because I know the military opposes these types of policies. But now, you have the opportunity to take that upon yourself. . . . . Most recently, we added Luualalei Naval to the list of lands that we would like to also see returned to our Waianae moku and the legislation that we introduce every year. Our community and I also strongly supported a bill that was introduced in congress by former Representative Kahele, I mean, the Leandra Wai Act. Through this process, my heart and mind are with the many ohana and lineal descendants who were once caretakers of this sacred place, but were evicted from Makua during the war and land grab. It was a bittersweet moment to be in Makua with our kupuna to celebrate the U.S. Government signing of a document stating they will no longer need Makua for live firing. If that is truly the case, I see no need to retain this sacred aina. . . . . In closing, I would like to say mahalo nui loa to the many residents and our kupuna who came before us to stop the desecration and keeping the agenda to Malama Makua alive along with other initiatives. They have sincerely inspired me to continue the good fight as a community member and now, as a life -- as an elected official along with educating all of us on how important this aina is to our people, our culture, and our history. . . . . I look forward to seeing the continuation of the live firing agreement and, ultimately, see Makua</p>	Please see General Response.

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		Valley restored to the majestic place it once was.· Mahalo to the military for hosting tonight's meeting.· My hope is that you will hear sincerely the voices and hearts of our people and provide your assistance and full support to clean up all the UXOs and toxins before the aina is rightfully returned to our native Hawaiian community.· Mahalo.	
Arianna Adabachi		TO: Maui Planning Commission Chairperson, Kimberly Thayer Maui Planning Commission Chairperson Vice-Chairperson, Dale Thompson FROM: Arianna Adabachi RE: Mākena Mauka Environmental Impact Statement Preparation Notice Aloha, My name is Arianna Adabachi and I was raised on Maui. I am writing in STRONG OPPOSITION of the Mākena Mauka Master Planned Residential Community Development This project has Negative impacts on our water resources. We should prioritize water resources for local housing and the rebuilding of Lahaina. This project has negative impacts on marine life and the environment. There has been a decrease of marine animals like ‘opihi, hā‘uke‘uke, ‘uhu, manini, limu, and other natural resources as a result of present large scale developments and foreign human population. The impacts of Settler Colonialism on Hawaiian ‘ohana and kama‘āina have been beyond detrimental to the environment. Many Maui ‘ohana have been displaced due to the affects of luxury developments: Increased housing cost and property taxes. The negative impacts to traditional and cultural sites and practice must be stopped. Kānaka ‘ōiwi mauka and makai gathering rights according to Article 12 Section 7 will be greatly affected and have a detrimental impact on our cultural and traditional natural resources. Moreover, the increase of tourists and visitors traffic in areas such as Palauea, Po‘olenalena, Pāpa‘anui,	Please see General Response.

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Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>Kā’eo, Keauhou, Maluaka, Oneloa, and adjacent shoreline areas has had a negative impact</p> <p>Live-fire training ceased in 2004 after numerous community lawsuits were filed; however, clean-up and restoration remain to be completed.</p>	<p>Section 2.1 describes the steps to range cleanup and restoration. Section 3.6.5 has been revised to clarify that the entirety of the State-owned land enclosed by the fence east of Farrington Highway at MMR, 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. Until lease expiration, or designation of certain areas of the State-owned land as “closed ranges,” MEC on State-owned land at MMR will continue to be managed under the MMR SOPs.</p> <p>The last major live fire exercise at MMR was in 2004. No live-fire training is proposed at MMR through this Proposed Action.</p>
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>Fundamentally, the Environmental Caucus of the DPH objects to the retention of the 65-year military leases for, inter alia, the unconscionable consideration of \$1.00 USD (for the entire lease term, and it is even questionable whether that single dollar was ever paid!). These leases began in 1964 and will expire on August 16, 2029. The Environmental Caucus advocates for the NO ACTION ALTERNATIVE. The basis for this opposition rests on the National Environmental Policy Act (NEPA).</p> <p>Historically, the military's actions have not demonstrated any real great concern for the local communities, their culture, and their history. As it stands, the military has plenty of land available even without the 6,322 acres of state land on O’ahu subject to retention. Pohakuloa Training Area is the largest contiguous live-fire range and maneuver training area in Hawai’i, covering nearly 36 square miles</p>	Please see General Response.

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		<p>on Hawai‘i Island. It is also subject to State lease renewal on August 16, 2029. The EIS process for Pohakuloa Training Area started earlier, on September 23, 2020.</p> <p>The military has 17,725 acres (72 km<sup>2</sup>) on Central O‘ahu at Schofield Barracks; the Marine Corps Base Hawai‘i at Kane‘ohe, occupies 2,951 acres (11.94 km<sup>2</sup>), which is the entire Mokapu Peninsula; and the Joint Base Pearl Harbor–Hickam consisting of 2,850 acres of land and facilities valued at more than \$444 million, all of which could be used as alternative maneuvering and training sites should the three State lease retention requests be rejected. For these reasons, the “no action alternative” regarding the retention of these three State leases will not adversely affect the Army’s current operations, because alternative training locations are viable and available. The question should be, is the retention of these State leases absolutely necessary for military exercises?</p> <p>The answer to this question resounds in the negative especially in light of the environmental degradation of the lands, the endangerment of plant and animal species, and the destruction of historical, traditional, and cultural properties. While the Environmental Caucus reserved oral testimony for our written testimony during the three public comment meetings held on July 9, 2023 at the Waianae District Park MultiPurpose Room, July 10, 2024 at Kahuku High and Intermediate School, and July 11, 2024 at Leilehua High School, the Environmental Caucus observed through video recordings of these meetings that nearly 100% of the oral testimony received was in opposition to the State lease retention, thus seeking the no action alternative, which would allow these Military leases to expire according to their written terms.</p> <p>The reasons for this opposition have been multiple: First, 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 in the State of Hawai‘i and nationwide. Second, the proposed renewal at these three locations would continue to be environmentally destructive and entirely out of proportion to what</p>	

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		<p>minimal benefit it might provide to the host native Hawaiian people, its traditions and culture, and all residents of the State of Hawai‘i in general.</p> <p>As to the first reason: 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, an ongoing threat or risk to the public may remain. 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> <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 purposes of NEPA and HEPA cannot be accomplished by the retention of the three State Leases and allowing the Army to continue its maneuvering and training thereon as it did for the last 60+ years.</p> <p>There are 115 Military installations with hazardous sites in the State of Hawai‘i ALONE with an estimated total past and future cleanup cost of \$2.77+ Billion and of the 115 Military installations, 43 are determined by the DOD to be HIGH and MEDIUM hazardous risk Installations. See the following chart: [see original letter for chart] [...]</p> <p><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>	



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		<p>The point of providing this listing is to demonstrate the absolutely deplorable record of the U.S. military in exercising its stewardship responsibilities as a lessee and as titleholder of lands in the State of Hawai’i.</p> <p>Given the multitude of Military Installations throughout the State of Hawai’i that remain at 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 State lease retentions. Our bases include, but are not limited to NEPA, HEPA, 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), as well as fundamental principles of environmental protection and logic. 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 Article XI, Section 1 of the Hawai’i State Constitution provides that the Public Trust Doctrine (“PTD”) is a fundamental element of Constitutional Law in the State of Hawai’i. The Federal Government in its activities is required to conform to the laws under the Hawai’i State Constitution. 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:</p> <ol style="list-style-type: none"> <li>1. Domestic water use of the general public, particularly drinking</li> </ol>	

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		<p>water,</p> <p>2. The exercise of Native Hawaiian and traditional and customary rights including appurtenant rights,</p> <p>3. Reservations of water for Hawaiian Home Land allotments, and</p> <p>4. Maintenance of waters in their natural state. (Water Resource Protection Plan (2008), Commission on Water Resource Management)</p> <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 PTD. 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> <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, residents, businesses, and visitors to the State of Hawai’i, adopted the following Resolution:</p> <p>GOV:2018-18 Urging the Congressional Delegation to Actively Work to Ensure that the Military Protects Our Natural Resources</p> <p>Whereas, Damaging the land and impairing natural resources is inconsistent with protecting the homeland; and Whereas, 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; and Whereas, 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; and Whereas, A state judge questioned the Army’s veracity and reliability when it</p>	

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		<p>claimed to regularly clean up debris after each training exercise at Pōhakuloa; and Whereas, 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 it Resolved, 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 it Ordered, That copies of this Resolution be transmitted to the Hawai‘i Congressional delegation. [End quote]</p> <p>In addition, the Democratic Party of Hawai‘i passed the following Resolution in light of the Hawai‘i Supreme Court’s opinion in Ching v. Case, (supra), approving the decisions of three levels of the Hawai‘i Judiciary that declared that administrative agencies must follow the environmental protection provisions of the Hawaii Constitution, or else their decisions will be overturned. The same should apply to any Hawai‘i State agency that approves renewal of the Military’s leases if environmental considerations are not given appropriate deference.</p> <p>ENV:2018-09 Urging the Board of Land and Natural Resources to Abide by the Principles of Mālama ‘Āina Whereas, The Board of Land and Natural Resources (BLNR) has a trust duty to mālama ‘āina; and Whereas, The BLNR refused to assess the environmental impact of commercial aquarium collection until ordered to do so by the courts;</p> <p>Whereas, In Ching v. Case (Civ. 14-1085-04) on April 3, 2018, First Circuit Judge Gary Chang concluded that the BLNR breached its duty to mālama ‘āina when it failed to monitor and investigate the Army’s compliance with lease terms to clean up unexploded ordnance at Pōhakuloa on Hawai‘i Island; and Whereas, The Hawai‘i Supreme Court, the Intermediate Court of Appeals, and a circuit court concluded in three different cases that BLNR’s historic preservation division has violated its own rules that protect significant historic sites; and Whereas, The BLNR attempted to</p>	

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		<p>relinquish the public’s interest in a shoreline path in Waikīkī;                      Whereas, For years, the BLNR has continued to allow Alexander &amp; Baldwin to take millions of gallons of water daily from dozens of streams without ever analyzing the impact on aquatic life in each of these streams; and Whereas, The Hawai’i Supreme Court concluded that the BLNR acted arbitrarily and capriciously, and abused its discretion by ignoring court decisions and a court order when certifying the shoreline; now therefore, be it Resolved, That the Democratic Party of Hawai’i urge all members of the Board of Land and Natural Resources to abide by the principles of mālama ‘āina as described in Ching v. Case (cited above); and be it Ordered, That copies of this Resolution be transmitted to the Governor of the state of Hawai’i and each member of the Board of Land and Natural Resources. [End quote]</p> <p>As to the second reason, the Environmental Caucus strongly prefers the No Action Alternative is preferred as neither (1) Full Retention, (2) Modified Retention, nor (3) Minimum Retention and Access of the expiring military KTA, PTA, and MMR State Leases would comply 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.</p> <p>Clearly, there are serious environmental, social, and cultural concerns associated with the KTA, PTA, and MMR State Lease Retentions, even if modified retention or minimum retention and access. The circumstances surrounding the State lease retentions coupled with the existing frustration of Hawai’i residents over current military unsatisfactory stewardship of the Pōhakuloa Training Area and other areas described, supra; current endangerment of O’ahu’s MoanaluaWaimalu groundwater aquifer below the Red Hill fuel storage tanks which supplies potable water</p>	

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		<p>to Moanalua through Honolulu to Hawai’i Kai, and the numerous Pearl Harbor CERCLA superfund sites that evidences the military-caused environmental degradation, give the local community ample grounds to object the full, modified, and minimum retention and access to KTA, PTA, and MMR. These military-related uses of KTA, PTA, and MMR (a) fail to encourage productive and enjoyable harmony between man and the environment as the environment suffers irreparable harm; (b) as to MMR, fail 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 fail to stimulate the health and welfare of man; and (c) fail to enrich the understanding of the rare ecological systems and natural resources and wildlife important to our Nation as required under NEPA and HEPA.</p>	
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>Preliminarily, the Environmental Caucus rejects the process involved in developing a draft EIS for the Army Training Land Retention of State Lands at Kahuku Training Area, Pōamoho Training Area, and Mākua Military Reservation, Island of O’ahu, Hawai’i for the Department of Army (Army). Given that the Army has retained itself to process the draft EIS, we find that to be a blatant conflict-of-interest, and we, therefore, urge the Army to retain an independent disinterested third-party to conduct this draft EIS to assure a fair and just result, free from bias and self-interest in the resulting EIS, compiled in the best of interests of all stakeholders and not just in the best interests of the Army. Currently, having the Army process an EIS concerning the Army’s authority, responsibility, and past and future activities is clearly a conflict of interest and should not have been allowed under any circumstances. This foreseeable and inevitable conflict is clearly unreasonable and unjustifiable without any grounds to allow such conflict to stand without challenge. Back in August 2021, the Environmental Caucus demanded that this conflict of interest be eliminated and resolved by replacing the DOA immediately with a disinterested third-party to complete the draft EIS. It is apparent</p>	<p>NEPA Section 102 requires the responsibility for preparation of NEPA documents with "all agencies of the Federal Government," including the Army. The Army is the lead Federal agency for the Proposed Action, and per the NEPA definition for a lead agency, the Army is responsible for preparing the EIS.</p>

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		that the Army has failed to do so, and therefore, this EIS and the process surrounding it are tainted by this fundamental conflict of interest.	
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	Fundamentally, over the past three years, since we made our preliminary comments back in August 2021, the Army has ignored the 12 environmental issues that we previously have raised. Indeed, now, we believe that we must add a proposal for a key procedural requirement for any lease renewals to include ongoing enforceable requirements for environmental protection, and add one more very critical substantive environmental issue relating to environmental toxins in the PFAS family of chemicals. Any Lease Renewals Must Have Enforceable Requirements for Environmental Protection Before we proceed with our objections to the approval of any renewals of the current set of military leases, we recognize the immense power imbalances that will almost certainly result in the renewal of at least some of the current leases. We believe that it is essential for any future lease renewals must include ongoing enforceable requirements for environmental protection and restoration. We outline below how these protections need to be implemented. As detailed below, the current leases have resulted in multiple forms of environmental contamination. The military cannot deny these irrefutable facts. Among the contamination are: (1) Littering some sites with unexploded ordinance that has not been cleaned up; indeed, we are unaware of any serious effort by the military to remove them; and (2) Contamination of the soil, groundwater, and drinking water with environmental contaminants whose toxicity is only recently becoming understood. These contaminants must be removed, and citizen-enforceable provisions need to be inserted into any future leases to ensure that actual removal activities will take place on an expedited timetable, rather than being empty promises. We also believe that there needs to be a citizen oversight board for each military base that will have the legal standing and authority to engage on a regular and frequent basis with well-briefed representatives of the relevant military branch(es) who will respond in an adequate and timely manner to	<p>Section 3.6.5 has been revised to discuss the purpose and conclusions of the Army Preliminary Assessment/Site Inspection (PA/SI), and explain that no further PFAS investigations at these installations were warranted.</p> <p>Section 3.6.5.3 has been revised to include UXO removal efforts that have occurred at MMR. An oversight board is not anticipated to be included in future leases at this time.</p>

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		<p>inquiries by such civilian oversight boards regarding environmental, health, and related issues arising from the military’s continued use of any leases. The Environmental Protection Administration (EPA) provided a partially satisfactory model for such oversight boards in the Administrative Order on Consent (AOC) issued in 2023, for the closure of the Navy’s Red Hill Underground Fuel Storage Tanks and related clean-up. For these reasons, we believe that each and every future Military Lease should be made subject to an EPA-created and administered AOC, with an oversight board, such as the Community Representation Initiative (CRI) that was established under the 2023 Red Hill AOC, so that there is a mechanism in place from the beginning to inform the Military agency of residents’ needs and to require good-faith, timely, and meaningful cooperation and responses by the Military. However, we note that the Navy has been seriously uncooperative in its duties under the 2023 Red Hill AOC. Future oversight boards must have greater powers and be given substantially more respect.</p>	
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>Environmental Issue No. 1 – Effect on Land Use:                      KTA is located on the northern part of O’ahu, beginning in the lowlands across Kamehameha Highway from the shrimp farms and agricultural fields to the summit of the Ko’olau Mountains. The Army uses KTA for pyrotechnic training, foot maneuver training, urban combat training and helicopter training. The terrain consists of rolling hills dissected by broad drainages in lower elevations, and relatively steep and windswept ridges in upper elevations. Habitat within KTA is highly disturbed with some small, predominantly native forest patches in the mid elevation mesic forest leading up to mostly native stretches of summit and wet forest. Within the mid elevation mesic forest are the populations of endangered <i>Eugenia koolauensis</i>, Hawaiian name with diacritics: Nīoi. Nīoi is formerly found in dry gulches and slopes from 325 to about 985 feet in the north and south areas of the Ko’olau Mountains, O’ahu, and Mauna Loa, Moloka’i. Now presumed extinct on Moloka’i. Currently extremely rare and now found in the northern Ko’olau Mountains on the north fork of the Kamananui</p>	Please see General Response.

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		<p>Stream, Waimea Valley and from Pūpūkea-Paumalū, O’ahu. In native Hawaiian history, the Nīoi wood was believed to be poisonous and was carved into images called kālaipāhoa, literally poison gods or goddesses. The tree is said to grow only at Maunaloa, Moloka’i where this species once grew, but now extinct there. These images were always in possessions of the ruling chiefs. Shavings from the back of the images were placed in an enemies’ food to cause death. It was only when sorcery was employed were they said to be poisonous. Today, we know these trees to be harmless.</p>	
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>The U.S. Fish and Wildlife Service acquired this land as an addition to the James Campbell National Wildlife Refuge (Refuge). The Refuge is one of the premier recovery areas on O’ahu for four species of endangered Hawaiian waterbirds and supports a variety of migratory waterfowl and shorebird species and other native wildlife. The Refuge includes lowland coastal areas that features wetlands, beach coastal dunes, and strand habitats that the Service is protecting and managing as part of the National Wildlife Refuge System. An interdisciplinary team composed of refuge managers and biologists, public use specialists, planners, wetland and endangered species recovery biologists developed a range of land protection alternatives. The Estate leases most of the Kahuku coastal area to tenants who use the lands for commercial aquaculture, commercial fruit and vegetable farms, and horse and cattle grazing.</p> <p>The Kahuku coastal plain features are some of the best undeveloped coastal lowland wetlands, dunes, and coastal strand habitat on O’ahu. The land is managed as a high-quality wildlife habitat with some areas serving as management buffer areas. This area includes lands between the Refuge units, the large aquaculture facilities adjacent to Kamehameha Highway, and a portion of wetland, dunes, and coastal strand habitat seaward from the Ki’i Unit. This area features high quality wildlife habitats that have importance for endangered species and migratory bird habitat,</p>	<p>The EIS does not discuss or address potential James Campbell wildlife refuge effects. The James Campbell wildlife refuge is outside the ROI (as defined in the EIS), and there is no evidence or surveys that support the assertion that species from James Campbell wildlife refuge use KTA or are impacted by KTA activities at the refuge.</p>



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		<p>coastal plant and animal habitats, and some management buffer areas.</p> <p>The retention of KTA would continue to cause a threat to the conservation efforts of the U.S. Fish and Wildlife Service and the National Wildlife Refuge and a disproportionate threat to the habitats of endangered species, migratory bird habitats, coastal plant and animal habitats.</p>	
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>However, unlike MMR, neither KTA nor PTA were used for live-fire maneuvering and training; therefore, the return of KTA and PTA back to the State upon expiration of these State Leases would be fairly simple, as cleanup of military debris from live-fire training and unexploded ordnances and munitions is not at issue in those two areas. If the MMR, KTA, and PTA State Leases are retained, what will the U.S. Army do to alleviate, eliminate and avoid any and all adverse effects caused by its use of these state lands and what will the Army do to cleanup any and all military debris currently on these sites?</p>	<p>Lease compliance actions and cleanup and restoration activities that would occur after lease expiration are discussed in Section 4.2.4.</p> <p>Section 3.6.5 and Appendix F describe existing management measures to manage risks from hazardous substances and hazardous wastes, including training, management and SOPs for storage, handling, and site cleanup and restoration.</p> <p>Section 3.6.6 describes the five main plans the Army uses to manage environmental issues that includes the tracking of compliance with SOPs.</p> <p>Training SOPs are internal documents that are not available for public disclosure. Appendix F includes relevant information from the KTA, Poamoho, and MMR SOPs.</p>
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>Environmental Issue No. 2- Biological Resources:  A biological resource is a substance or object in the environment required by an organism for normal growth, maintenance, and reproduction. For plants key resources are light, nutrients, water, and a place to grow. For animals, key resources are food, water, and territory. The Army said in 2020 that it annually spends more than \$12 million in Hawaii on environmental programs. Its natural resources program helped save three native plant species from</p>	<p>The Army is committed to being a good steward of natural resources and works with various partners to implement its integrated natural resource management plan, as well as managing a seedbank to enhance the protection of rare and endangered species. The Army will follow the applicable regulations for all cleanup actions.</p>

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		<p>extinction: the haha, Hawaiian mint and tree aster. However, this amount is of no consequence considering the extensive military debris cleanup that needs to be done to return the lands back to its original fertile ecosystem, if this is even possible. The saving of three endangered plant species from extinction is commendable; however, there are many, many more endangered plant and animal species that remain at risk. These endangered plant and animal species must be given top priority as many of them cannot be found elsewhere in the world. The retention of the State-Military leases will continue adverse impacts on the biological resources for areas endangered plants and wildlife as their existing biological resources will be diminished and destroyed with continued military maneuvering and training. The greatest threat to these endangered species is the loss of habitat of which continue military use will add to the risk of plant and wildlife extinction by the elimination of their habitat. There are several rare taxa at KTA. We believe that the siting of the radar installation at this location would unreasonably place these species in existential jeopardy. They are (1) <i>Bobea timonioides</i>, a species of concern; (2) <i>Nesoluma polynesianum</i>, a species of concern; (3) <i>Pteralyxia macrocarpa</i>, a candidate for endangered; (4) <i>Tetraplasandra gymnocarpa</i>, endangered; and (5) <i>Lasiurus cinereus semotus</i>, endangered.</p> <p>(1) ‘Ahakea (<i>Bobea timonioides</i>) is a species of flowering tree in the coffee family, Rubiaceae, that is endemic to Hawai‘i. It inhabits dry, coastal mesic and mixed mesic forests at elevations of 250–580 meters (820–1,900 ft). It is threatened by habitat loss.</p> <p>(2) <i>Nesoluma polynesianum</i>, the keahi or island nesoluma, is a species of flowering plant in the family Sapotaceae. This plant is found in the Cook (New Zealand), Tubuai (French Polynesia), and Hawaiian Islands (United States). It is threatened by habitat loss.</p> <p>(3) <i>Pteralyxia laurifolia</i>, the ridged pteralyxia, is a species of plant in the family Apocynaceae. It is endemic to the Island of Oahu in the Hawaiian Islands. The species is listed as vulnerable, threatened by habitat loss.(4) <i>Polyscias gymnocarpa</i>, commonly known as the Ko‘olau Range ‘ohe or Ko‘olau tetraplasandra, is a species of</p>	<p>EIS Sections 3.3, 3.6, and 3.10 provide analysis for biological resources, hazardous substances and munitions and explosives of concern, and water resource impacts, respectively.</p>

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		<p>flowering plant in the family Araliaceae, that is endemic to the Hawaiian island of O’ahu. It is threatened by habitat loss.</p> <p>(5) The Hawaiian hoary bat (<i>Lasiurus semotus</i>, sometimes given as <i>Aeorestes semotus</i>), also known as ‘ōpe‘ape‘a, is a species of bat endemic to the islands of Hawai‘i. The Hawaiian hoary bat is distributed only among the major volcanic islands of Hawai‘i, making it the only extant and native terrestrial mammal in the state. The Hawaiian hoary bat was officially named the state land mammal of Hawai‘i in 2015. It is a federally listed endangered taxon of the United States. The Hawaiian hoary bat is brown in color with a silver coloration that ‘frosts’ the fur on its back, ears, and neck. It typically weighs between 14 to 18 g (0.49 to 0.63 ounces), and has a wingspan of about 10.5 to 13.5 inches, with females being larger than males. It is insectivorous, nocturnal, and forage and hunt using echolocation.</p> <p>Hoary bats are a solitary subspecies and roost individually rather than in colonies. They are found throughout a large range of different habitats - forests, agricultural fields, and areas populated with humans. Due to their elusive and solitary nature, there is very limited knowledge on the ecology or life history of the bat. As of now, population sizes are unknown, which is problematic because this data is necessary for species recovery plans. Currently the Hawaiian hoary bat is listed as endangered under the Endangered Species Act. Regarding conservation, the Hawaiian hoary bat faces a number of possible threats including habitat loss, collisions with man-made structures such as wind turbines and barbed wire, impact of pesticides on primary food source, predation and competition with invasive species, and roost disturbance and tree cover reduction.</p> <p>(6) Hawaiian Monk Seals and Hawaiian waterbirds are a critically endangered species with habitual movements. They tend to make specific beaches their home and return to them regularly, especially while giving birth and nursing. Kahuku point and the James Campbell National wildlife Refuge and sanctuary are popular habitats for the endangered monk seals and waterbirds which will</p>	

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		<p>be threatened by the deployment of the HDR-H at the KTA-1 site. All four species of endangered Hawaiian waterbirds – Hawaiian stilt, Hawaiian coot, Hawaiian moorhen, and Hawaiian duck – nest and maintain populations on the Refuge and occur within the Kahuku coastal plain. The Refuge and surrounding areas are premier spots for observing wintering migratory waterfowl and shorebirds that visit from September through May. Important migratory species on the Refuge that would benefit from protection and management of additional habitat include Shoveler, Northern pintail, Black-crowned night heron, Pacific golden plover, Semi-palmated plover, Ruddy turnstone, Sanderling, Wandering tattler, Lesser yellowlegs, and Bristle-thighed curlew. Ring-billed gull regularly visit the Refuge during winter months. The Asian Short-eared owl (also known as Hawaiian owl or pueo) is a Species of Concern and listed as endangered on O’ahu by the State of Hawai’i. Owls have been observed hunting over grassy areas and marshes on and adjacent to the Refuge.</p> <p>In the recent past, green turtles nested in the area every other year for a total of three nesting seasons. Eggs were deposited in the sand just south of the Ki’i outlet. Endangered Hawaiian monk seals are known to occur in offshore waters and would likely use the beach area if undisturbed. Protection of the area from predators would also foster colonization of the dune strand areas by Pacific migratory seabirds including Laysan albatross, Red-footed boobies, and ground nesting seabirds such as shearwaters and petrels. All of these endangered, candidates for endangered, and species of concern are under threat of habitat diminution as the result of the proposed siting of HDR-H at KTA-1.</p>	
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>Mākua Military Reservation (MMR)                      There are numerous endangered plants species and animal species in the MMR. MMR encompasses two valleys, Kahanahaiki and Mākua, which are the northern-most valleys in the Wai'anai Mountains. Encompassing approximately 4,190 acres, MMR was once the largest maneuvering/live-fire training area on O' ahu but</p>	Section 3.3.5.3 includes analysis of endangered species at MMR.

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		<p>based on continuous community outcry, protests, and demonstrations, live-fire training in this area ceased. Elevation within MMR ranges from sea level to just over 3,000 feet. While most of the natural habitats within MMR are highly disturbed there are large pockets of relatively intact dry and mesic forest. The terrain at MMR is extremely steep, exposed and rocky. There are five MUs and two ungulate control areas within MMR (See Figure B, Management Units Mākua Military Reservation). There are a total of thirty-three endangered species in Mākua, thirty of which are plants.</p>	
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>Kahanahaiki Management Unit                      Kahanahaiki MU is located on the northeast rim of Mākua Valley. At its boundary to the East, is the State of Hawaii’s Pahole Natural Area Reserve. Kahanahaiki has an elevational range of 1,500 feet to 2,300 feet and an annual rainfall of 1,200 mm-3, 800 mm. Kahanahaiki MU is approximately 110 acres in size and is characterized as being a diverse mesic forest. Ridges and drainages that feed into the northern half of MMR (Kahanahaiki Valley) dissect the Kahanahaiki MU. A feral pig exclosure fence surrounds 90 acres of the Kahanahaiki MU. This fence was completed in December of 1996. Kahanahaiki contains twelve endangered plant species and two endangered animal species and is the site of the first endangered species outplanting on military lands in Hawaii. Because there is good road access and native resources are abundant, Kahanahaiki has been a focal point for volunteer projects.</p>	<p>Section 3.3.5.3 includes actions the Army takes to control feral ungulates and analysis of endangered species at MMR. The EIS does not include analysis of MUs on U.S. Government-controlled land.</p>
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>‘Ohikilolo Management Unit                      ‘Ohikilolo MU is located on ‘Ohikilolo Ridge, which is the southern boundary of Mākua Valley. It encompasses approximately forty acres. The terrain is extremely steep and rocky and access to the upper portion of this management unit is by helicopter only. Large patches of ‘Ohikilolo Ridge lack vegetation and erosion by wind and rain is severe. A large population of goats once exacerbated this problem by consuming most of the vegetation on the ridge. With</p>	<p>Section 3.3.5.3 includes actions the Army takes to control feral ungulates and analysis of endangered species at MMR.</p>

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		intensive goat control measures and a perimeter fence installed, this MU is now very close to being ungulate free. ‘Ohikilolo MU harbors a great deal of intact vertical cliff habitat and small patches of intact mesic forest. There is a goat-proof enclosure of approximately two and a half acres at the plateau where ‘Ohikilolo ridge meets Kea’au ridge from the south. ‘Ohikilolo contains thirteen endangered plant species and two endangered animal species. ‘Ohikilolo is also home to the largest population of <i>Achatinella mustelina</i> known to the Natural Resource Staff (NRS).	
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	Kaluakauila Management Unit Kaluakauila MU is approximately forty-five acres and is located in and around Kaluakauila drainage, just north of Mākua Valley. The area around this drainage is referred to as Keawa’ula. This MU is made up primarily of dry forest on steep slopes and contains some intact native cliff habitat. Kaluakauila MU is very susceptible to fires because the habitat surrounding the intact native forest patches is comprised of introduced grasses and shrubs, which have very high fire potentials. There are a total of six endangered plants in Kaluakauila MU.	Section 3.3.5.3 includes analysis of wildland fire impacts and endangered species at MMR.
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	Lower Mākua Management Unit The Lower Mākua MU is located at the base of the cliffs on the southern side of Mākua Valley. Portions of the lower valley contain extensive intact stands of dry forest that become intermixed with mesic forest as elevation increases. The Lower Mākua MU ranges from 800 feet to 2,200 feet in elevation and encompasses an area of 270 acres. NRS believe that the stands of dry and mesic forest found in this MU are the most intact on O’ahu. The Lower Mākua MU contains eight endangered plant species and two endangered animal species.	Section 3.3.5.3 includes analysis of endangered species at MMR. The EIS does not include analysis of MUs on U.S. Government-controlled land.
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	C-Ridge Management Unit The C-ridge MU is located on the north exposure of the large ridge, which separates Mākua and Kahanahaiki Valleys. It is a small four-acre patch of native dry forest surrounded on the lower side by introduced grasslands and on the upper side by sheer cliffs between 800 and 1,200 feet. The hike to C-ridge is lengthy which limits the	Section 3.3.5.3 includes analysis of wildland fire impacts and endangered species at MMR. The EIS does not include analysis of MUs on U.S. Government-controlled land.

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		amount of time spent and number of trips made to the area. This MU used to be susceptible to fires from military live-fire training now ceased. There are a total of three endangered plant species known from this MU.	
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>East Rim Ungulate Control Area</p> <p>The East Rim Ungulate Control Area is situated at the headwall of the southern side of Mākua Valley, opposite Pahole Natural Area Reserve. It contains small native mesic forest patches but is dominated by non-native canopy and understory species. Christmas berry (<i>Schinus terebenthifolius</i>) dominates large portions of this area. The substrate character of this Ungulate Control Area varies from loose rocky soil to rocky cliff. This unit extends from 1,800 ft to 2,600 ft and is approximately one hundred acres in area. There are a total of three endangered plant species in the East Rim Ungulate Control Area.</p>	Section 3.3.5.3 includes analysis of endangered species at MMR. The EIS does not include analysis of MUs on U.S. Government-controlled land.
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>Ko'iahi Ungulate Control Area</p> <p>Ko'iahi Ungulate Control Area is centered on Ko'iahi gulch, which is the southernmost subgulch of MMR. The southern boundary ridge of Mākua, 'Ohikilolo, and a spur ridge off of 'Ohikilolo form Ko'iahi gulch. Alien scrubby vegetation and kukui (<i>Aleurites moluccana</i>) overstory dominate this area. The substrate character of Ko'iahi ranges from rocky talus to rocky cliff and gulch substrates. This area extends from 400 ft to 2,200 ft in elevation and is approximately two hundred and thirty acres in area. There are a total of eight endangered plant species in Ko'iahi Ungulate Control Area.</p>	Section 3.3.5.3 includes analysis of endangered species at MMR. The EIS does not include analysis of MUs on U.S. Government-controlled land.
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	If the MMR, KTA, and PTA State leases are to be retained, what will the U.S. Army do to alleviate, eliminate and avoid any and all adverse effects to the area biological resources caused by its use of these state lands that impacts the habitats of endangered plant and animal species and what will the Army do to clean up any and all military debris currently on these sites that are already destroying these habitats?	<p>The Army complies with ESA Section 7 biological opinions as well as the Integrated Natural Resources Management Plan, and DoD and Army regulations for environmental stewardship.</p> <p>The Army adheres to procedures and requirements outlined in USARHAW Regulation No. 350-19 and applicable standard operating procedures for all training activities and associated range management activities. See</p>

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Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>Environmental Issue No. 3 – Effect on Historic Cultural Resources &amp; Cultural Practices: Cultural resources are the prehistoric and historic remains or indicators of past native Hawaiian activities including artifacts, sites, structures, buildings, landscapes such as rock inscription, and earthworks; and objects or collection of importance to the native Hawaiian culture or community for scientific, traditional, religious, and other reasons. Three years ago, on August 10 and 11, 2021, the U.S. Army held public scoping hearings for an Environmental Impact Statement (EIS) for Army Training Land Retention. Among the several dozens of individuals that testified, there was unanimous agreement that the U.S. military must clean up their military debris and leave, calling for the No Action Alternative. Many Kānaka Maoli (Native Hawaiians) testified about the ongoing violence of the U.S. military desecrating the environment with unexploded ordnance and depleted uranium, demolishing cultural sites, and trampling on the iwi (bones) of their ancestors. The Section 106 process requires the Army to consult with the Hawai’i State Historic Preservation Division (SHPD) and local residents regarding traditional and customary practices, cultural, historic and/or religious significance to themselves or their ohana. [...] KTA is located in the Ko’olauloa District. Ko’olauloa is the northeastern district of O’ahu, from Waimea Bay on the North Shore to Ka’a’awa on the windward coast. (“Ko’olau” means “windward”; “loa” means “long”) The valleys from La’ie to Kahana are well-watered and fertile. The most famous god of this land was Kamapua’a, “Pig-Child,” whose home was in the valley of Kaliuwa’a (Sacred Falls) in Kaluanui. The gods Kāne and Kānaloa wandered through this district, creating springs and fishing. Fish are abundant; the coastline is also noted for its shark gods and shark men (mano kanaka). The KTA is situated near a he’iau. This Hawaiian altar is an ‘ahupua’a demarcation between the `ahupua`a land division boundaries of Hanaka’oe to the west and Kahuku to the east. ‘Ahupua’a – literally the altar (‘ahu) of the pig (pua’a), is the name</p>	<p>Sections 2.2.2, 2.2.3, and 2.2.4 for training activities that occur on State-owned lands.</p> <p>Section 2.5 of the Final EIS has been revised to state the No Action Alternative is identified as the Preferred Alternative for Poamoho and MMR (i.e., the State-owned land would not be retained at these two locations); and Alternative 2 has been identified as the Preferred Alternative for KTA (i.e., only Tract A-1 would be retained for Army use and Tract A-3 would be returned to the State). Section 3.4.5 discusses the historic and cultural resources at KTA, and analyzes the impact of training activities on these resources.</p>



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		<p>for both land division and the stone altar that serves as the marker of the division. The ‘ahupua‘a system of land management was a cornerstone of traditional Hawaiian life and helped Native Hawaiians to develop one of the most sustainable methods of land use in the world. Extending from the forested mountain tops mauka (inland) or the wao akua (region of the gods), through the kula (open plains used for farming) and extending out into the makai (ocean), each ‘ahupua‘a contained everything its inhabitants needed to sustain life which it did for the more than one thousand pre-colonization years before the late 1700s. The retention of the Military Leases would alter the cultural resources of prehistoric and historic remains or indicators of past native Hawaiian traditions, culture, and activities.</p>	
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>For the Kānaka Maoli, the use of the land, the seas, and the air by the U.S. military represent a military occupation and an encroachment of their sovereign rights to determine the future of Ka Pae ‘Aina (as sovereignty activist Dr. Kekuni Blaisdell taught people should call Hawai‘i). Ka Pae ‘Aina needs to reduce its dependence on the U.S. military and tourism. The people of Ka Pae ‘Aina demand the return of the lands leased to the military to their natural state. The U.S. military must clean up its waste and unexploded ordnance from the leased lands. The collective rights of Kānaka Maoli must be protected – the right to peace, the right to a healthy environment, the right to self-determination, and the right to human-oriented development. The people of Ka Pae ‘Aina are for peace and multicultural, international understanding. They do not want any part of the escalation of military conflict between the competing imperial centers of the U.S. and China. Ka Pae ‘Aina must not be used by the U.S. war machine. Support must be afforded to the Native Hawaiians and their aspirations for peace and justice. Communities need to work together to heal, protect, and nurture their ancestral lands after decades of war and destruction. Refusing to renew the leases of lands occupied by the U.S. military is a necessary and urgent step toward this goal.</p>	Please see General Response.

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Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	If the MMR, KTA, and PTA State Leases are retained, what will the U.S. Army do to alleviate, eliminate and avoid any and all adverse effects to the area cultural resources caused by its use of these state lands that impacts the tradition and culture of native Hawaiians and what will the Army do to cleanup any and all military debris currently on these sites that are already destroying the culture and traditions of native Hawaiians?	<p>Section 3.4.5 discusses the Existing Management Measures and Efforts, including the 2018 Integrated Cultural Resources Management Plan (ICRMP) and NHPA Section 106 Programmatic Agreements (PAs) and related documents for O’ahu. Section 3.5.5.3 further delineates cultural access policies and agreements specifically for MMR; and Section 3.6.5.3 discusses the range management activities conducted to ensure no materials, including debris, trash, and brass are left behind following training exercises at MMR.</p> <p>Section 2.5 of the Final EIS has been revised to state the No Action Alternative is identified as the Preferred Alternative for Poamoho and MMR (i.e., the State-owned land would not be retained).</p>
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>Environmental Issue No. 4 – Effect on Hazardous Materials and Waste Management: Spread of PFAS and Other Toxins: In addition, and of utmost importance, is the gravity of the adverse health effects from longterm exposure to PFAS and its related chemicals, as well as other “GenX” chemicals. All Military agencies must abide by the proposed Rules for the National Primary Drinking Water Regulations (NPDWR). See, National Primary Drinking Water Regulations   US EPA. For example, the NPDWR establishes MCLs at 4 ppt for PFOA and PFOS, and 1.0 ppt Hazard Index for combined GenX chemicals. We support these new rules. They are much stricter than the merely advisory Environmental Action Levels (EALs) of the Hawai’i State Department of Health (DOH). The DOH, rather than reducing the PFAS EALs, increased them to greater unsafe levels. Adopting the NPDWR would create national uniformity, bringing Hawai’i closer to a safe measurable drinking water standard. Those EALs were adopted and increased without public notice that was anywhere near adequate or scientific justification after requests by the Military for higher action levels that would, generally, allow the Military to avoid taking remedial</p>	<p>Section 3.6.5 has been revised to discuss the purpose and conclusions of the Army Preliminary Assessment/Site Inspection (PA/SI), and explain that no further PFAS investigations at these installations were warranted.</p> <p>Section 3.6.5 and Appendix F describe existing management measures to manage risks from hazardous substances and hazardous wastes, including training, management and SOPs for storage, handling, and site cleanup and restoration.</p> <p>Lease compliance actions and cleanup and restoration activities that will occur upon lease expiration are discussed in Section 4.2.4 in the Final EIS, which was previously Section 4.2.2 in the Draft EIS.</p>

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		<p>actions. Hawai’i is a highly militarized state where the PFAS EALs do not follow the EPA’s Science Advisory Board but rather follow military requests for increased EALs upon releases of the contaminants to relieve it of notice requirements and remediation duties. For example, in Hawai’i, in December 2022, the State’s PFOA EAL was at 6 ppt; however, in April 2023, the DOH increased the level to 12 ppt. Similarly, the PFOS EAL was at 4 ppt, then DOH increased the level in April 2023 to 7.7 ppt. Combined GenX Chemicals EALs were at 652 ppt, then increased by DOH to 1801 ppt. All without any serious effort by DOH to provide public notice or any meaningful opportunity for the public to be heard. PFAS and its related chemicals are known to cause kidney cancers, liver damage, heart attacks, strokes, and developmental (birth weight) effects. PFAS have been detected in Kunia, Waipio, Honolulu and Kahului airports, and eight Hawai’i military sites, including the Navy’s Pearl Harbor drinking water. This liquid cancer is ingested through drinking water, breathing, and eating fish, animal, and agricultural products. It is absorbed through cosmetics, personal items, clothing, carpets, linen, and bedding. With these Rules come uniformity, nationally, and statewide that are much safer than our local Rules. Similarly, the Military must conform generally to EPA EAL standards, rather than the currently inadequate Hawai’i DOH standards. Military contamination hazards include unexploded ordnance, various types of fuels and petroleum products; organic solvents such as perchloroethylene and trichloroethylene; dioxins and PCB; explosives and propellants such as RDX, TNT, HMX and perchlorate; heavy metals such as lead and mercury; napalm, chemical weapons, and radioactive waste from nuclear powered ships. Cobalt 60, a radioactive waste product from nuclear-powered ships, has been found in sediment at Pearl Harbor. Between 1964 and 1978, 4,843,000 gallons of low-level radioactive waste were discharged into Pearl Harbor. 2,189 steel drums containing radioactive waste were dumped in an ocean disposal area 55 miles from Hawai’i. KTA, PTA, and MMR have delicate ecosystems that already struggle to properly manage waste. Surrounding</p>	

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		<p>communities should not be burdened with any additional magnitude of hazardous waste production and disposal. If the MMR, KTA, and PTA State Leases are retained, what will the U.S. Army do to alleviate, eliminate and avoid any and all hazardous waste production and disposal caused by its use of these state lands and what will the Army do to cleanup any and all military debris currently on these sites?</p>	
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>Environmental Issue No. 5 - Air Quality &amp; Greenhouse Gases: Between 2015 and 2017, US forces were active in 76 countries. Of these seven were on the receiving end of air or drone strikes and 15 had “boots on the ground”. There were 44 overseas military bases, and 56 countries were receiving training in counter-terrorism. In 2017, all this added up to fuel purchases of 269,230 barrels of oil a day and the release of 25,000 kilotons of carbon dioxide equivalent into the atmosphere. ‘Military’s vast furnace’ “Each of these missions requires energy – often considerable amounts of it,” the scientists say. The impacts of climate change are likely to continue in ways that are more intense, prolonged and widespread, which would give cover to even more extensive US military operations. The only way to cool what they call the “military’s vast furnace” is to turn it off. US military is huge greenhouse gas emitter   Climate News Network % One way to turn it off is to reduce its carbon footprint by allowing the KTA, PTA, and MMR State Leases to terminate accordingly on August 16, 2029; this would be a way to turn it off and not turn it back on again. If the MMR, KTA, and PTA State leases are retained, what will the U.S. Army do to alleviate, eliminate and avoid any and all greenhouse gas emissions caused by its helicopter maneuvering and training use of these state lands and what will the Army do to cleanup any and all military debris currently on these sites? What, if any, renewable energy can be available to eliminate the use of fossil fuels during the Army’s helicopter and other aviation training exercises?</p>	<p>EIS Section 3.7.5 discusses existing air quality management measures that address ongoing emissions from training; no additional air quality management measures or renewable energy sources that offset emissions from aircraft and training activities on State-owned lands are proposed or necessary. The Proposed Action would not increase air emissions or GHGs because the action is solely administrative in nature. For land retained, the Army would continue to adhere to all Federal and state air quality regulations.</p>
Melodie Aduja	Environmental Caucus of the	<p>Environmental Issue No. 6– Noise and Vibration: Sustained background noises or white-noise produced the Army helicopter and other aviation maneuver and training exercises impacts public</p>	<p>Noise impacts and mitigation are discussed in Section 3.8. Additionally, information on existing management measures is listed in the "Airspace"</p>

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	Democratic Party of Hawaii	<p>health and safety. Environments with sustained background noise can have variable effects on learning cognitive abilities, and various noise-related physiological changes. Epidemiological studies have addressed possible links between exposure to radio frequency (RF) and excess risk of cancer, decreased ability to perform mental tasks, reduced endurance, hearing effects of “buzzing”, “clicking”, “hissing”, and “popping” sounds depending on the RF pulsing characteristics. Radio frequency noise, both electromagnetic interference (EMI) and radio frequency interference (RFI) may affect residents in the surrounding communities. Radar can cause interference in medical devices like cardiac pacemakers and hearing aids and create other health emergency situations. Given that KTA, PTA and MMR are subject to continued helicopter and aviation maneuvering and training that can cause surrounding adverse health and safety effects on humans and wildlife, it would be best not to retain these State Leases where there are risks of harm to the residents of the surrounding communities. If the MMR, KTA, and PTA State Leases are retained, what will the U.S. Army do to alleviate, eliminate and avoid any and all adverse effects from noise and vibrations caused by its use of helicopters and other aviation crafts within these state lands?</p>	<p>discussion in Section 3.1.4 as well as in Appendix J of the EIS.</p> <p>Monthly training advisories are published to alert the public and neighbors of upcoming training activities that are louder in nature and may be heard outside the military installation. In addition to these notifications, USAG-HI has established internal policies and standard operating procedures in an effort to minimize training noise and its impact on the community.</p> <p>To alert USAG-HI of a specific noise complaint, please call the Community Concern Line at (808) 787-1528 or send an email to <a href="mailto:usag.hawaii.comrel@army.mil">usag.hawaii.comrel@army.mil</a>.</p>
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>Environmental Issue No. 7 – Effect on Geology and Soils: The mechanical breakup of rocks and the chemical weathering of minerals contribute to soil formation. The downward percolation of water brings dissolved ions and also facilitates chemical reactions, Soil forms most readily under temperate to tropical conditions, and moderate precipitation. The retention of the KTA, PTA, and MMR State Lease would allow the Army to continue to destroy the geology and soil at these sites just as any military causes substantial changes to the geology and soils; however, in this case, the adverse effect would be substantial to the diminishing habitats of the area’s endangered species mentioned herein. If the MMR, KTA, and PTA State Leases were retained, what will the U.S. Army do to alleviate, eliminate and avoid any and all adverse effects to the geology and soils caused by its use of these state lands and what will the Army</p>	<p>The Army would continue to avoid or minimize impacts to geological and soil resources through implementation of the existing management measures discussed in Section 3.9.5. Discussion of cleanup of debris would occur in accordance with the conditions of the leases.</p>

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Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>do to cleanup any and all military debris currently on these sites and restore these sites?</p> <p>Environmental Issue No. 8 - Effect on Water Resources: As mentioned above, the Kahuku coastal plain features some of the best undeveloped coastal lowland wetlands, dunes, and coastal strand habitat on O’ahu. The surrounding land is a high-quality wildlife habitat with some areas serving as National Wildlife Refuge management buffer areas. This area includes lands between the Refuge units, the large aquaculture facilities adjacent to Kamehameha Highway, and a portion of wetland, dunes, and coastal strand habitat seaward from the Ki’i Unit. This area features high quality wildlife habitats that have importance for endangered species and migratory bird habitat, coastal plant and animal habitats, and some management buffer areas. The goal of the National Wildlife Refuge is to assist with endangered water bird recovery as well as protect habitats for other migratory and resident wildlife. In addition, there are two watersheds in the area, and there are concerns about contamination to the drinking water in both watersheds. The retention of the KTA, PTA, and MMR State Leases would continue to cause a threat of risk of harm and damage to the habitats of endangered plant and animal species and would continue to create further risks of contamination to surrounding watersheds. If the MMR, KTA, and PTA State Leases are retained, what will the U.S. Army do to alleviate, eliminate and avoid any and all adverse effects to the area water resources caused by its use of these state lands and what will the Army do to cleanup any and all military debris currently causing water resource contamination on these sites?</p>	<p>Sections 3.3.5, 3.6.5, and 3.10.5 discuss the potential impacts associated with biological resources, hazardous substances and hazardous wastes, and water resources associated with the Proposed Action.</p> <p>Sections 3.6.5 and 3.10.5 as well as Appendix F describe existing management measures for hazardous substances and wastes and water resources for State-owned land retained. Sections 3.6.5 and 3.10.5 also address actions Army would take to cleanup and limit impacts on State-owned land not retained.</p>
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>Environmental Issue No. 9 - Socioeconomics: Socioeconomic status is the social standing or class of an individual or group. Social and economic factors, such as income, education, employment, community safety and social supports can significantly affect how well and how long we live, these factors also affect our ability to make healthy choices, afford medical care and housing, manage stress, and more. Working class refers to those</p>	<p>Sections 3.11.5.1, 3.11.5.2, and 3.11.5.3 discuss KTA, Poamoho, and MMR socioeconomic conditions, respectively. These sections discuss the housing supply for the three areas and note that demand for these areas shows a deficit. Additionally, the sections note that the Proposed Action would not result in population and growth</p>

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		<p>who must work in order to survive. The Kahuku, Wai‘anae, and Waipahu communities are composed of mainly working-class people. The retention of the KTA, PTA, and MMR State Leases in these communities’ backyard will not improve the socioeconomic condition of these communities, but rather it will reduce their socioeconomic conditions, as they will be retaining these military exercises in the “backyard” of communities that do not welcome them. The U.S. military’s current strategic posture in the Pacific is intended to provoke China. It poses the risk of World War III and the extinction of the human species. Home to the Indo-Pacific Command, Hawai‘i serves as the control center for U.S. military domination of over half the planet. For this reason, when Hawai‘i was not actually a State of the U.S., but rather a territory, Japanese imperial forces attacked Pearl Harbor in 1941. On January 13, 2018, an alert was issued to every cell phone in Hawai‘i that a ballistic missile was inbound, causing residents to scramble and some to continue to experience post-traumatic stress. That such an attack was even plausible demonstrates that the military presence does not make Hawai‘i safer, rather it made Hawai‘i a target. If the MMR, KTA, and PTA State Leases are retained, what will the U.S. Army do to alleviate, eliminate, or avoid such adverse socioeconomic effects caused by its use of these State lands and what will the Army do to improve the socioeconomic status of these communities that are adversely impacted by further military training in their backyard?</p>	<p>impacts, and therefore there would be no new impacts on housing.</p> <p>Chapter 1 notes that the policy of the United States, as set forth in the most recent National Security Strategy and National Defense Strategy, is to keep the Indo-Pacific open and accessible and to ensure that nations are free to make their own choices, consistent with obligations under international law. A free and open Indo-Pacific can only be achieved if the collective capacity of other regional states in the Indo-Pacific is built and sustained. For 75 years, the United States has maintained a strong and consistent defense presence in the Indo-Pacific and strives to meaningfully contribute to the region’s stability and peace through both diplomacy and deterrence.</p>
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>Environmental Issue No. 10 – Environmental Justice: As it is generally defined, “Environmental Justice” is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Those “policies” necessarily include the selection of site locations for governmental or commercial activities that adversely affect the neighborhoods of such sites when selected. Three sites are located close to concentrations of habitation, and those sites are indeed adversely affecting the neighboring communities. They are Pōamoho, Kahuku, and Mākuā.</p>	<p>The EIS acknowledges minor to significant adverse impacts on communities with environmental justice concerns from land retention, including from loss of ‘āina within the ROI for environmental justice as defined in Section 3.12.4, and is factoring that into decision-making on the Proposed Action to be documented in the ROD. Section 3.12 also recognizes potential impacts on other resources areas related to environmental justice, including biological resources, hazardous substances and wastes, and air quality and</p>

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		<p>We believe that the EIS fails to give adequate consideration of the adverse environmental impacts that these three sites have on the neighboring communities. We further believe that, if adequate consideration were given to these impacts, this consideration would be a strong, if not determinative factor in determining that the Military should not seek extensions of the leases for these sites.</p>	<p>greenhouse gases, among others listed in Tables 3-63, 3-68, and 3-73. The ROI for impacts on environmental justice at KTA, Poamoho, and MMR are described in Section 3.12.3 of the EIS.</p>
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>Environmental Issue No. 11 – Transportation &amp; Traffic: Transportation and traffic on the two-lane highways to KTA, PTA, and MMR have been slowed, creating a hazardous condition for the public for an unknown number of days when heavy military equipment have been transported, because it is the only roadway in the vicinity. Emergency response vehicles will be slowed, and this situation will compromise public safety. If the MMR, KTA, and PTA State Leases are retained, what will the U.S. Army do to alleviate, eliminate and avoid any and all adverse transportation and traffic effects in the area caused by its use of these state lands that impacts the ingress and egress on the two-lane highways to these sites which may compromise public safety among other inconveniences to the surrounding communities?</p>	<p>Section 3.13.5 has been revised to state that convoy traffic associated with periodic training exercises at training areas would continue to be coordinated with local authorities to avoid when possible, and otherwise minimize contributions to congestion-related along public roadways, particularly during peak travel periods and to avoid high-traffic intersections. Convoys are allowed to operate between 8:30 a.m. and 3:00 p.m., and between 6:00 p.m. and 5:00 a.m. to avoid peak traffic hours and disrupting the local community.</p> <p>Individual training units would continue to be responsible for notifying local authorities of the timing of convoys, especially to identify potential conflicts due to construction or temporary road closures. The USAG-HI Public Affairs Office would continue to assist units with the amplification of convoy advisories to the local community, including elected officials, to build awareness and inform those potentially affected by convoys.</p>
Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>Environmental Issue No. 12 – Effect on Health and Safety: If the MMR, KTA, and PTA State Leases are retained, what will the U.S. Army do to alleviate, eliminate and avoid adverse health and safety effects experienced at and from these sites to surrounding communities caused by the U.S. Army’s continued use of these sites for helicopter and other aviation maneuvering and training and what</p>	<p>Sections 3.6.5 and 3.7.5, and Appendix F contain information regarding management and mitigation measures for aviation maneuvering and training.</p>



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Melodie Aduja	Environmental Caucus of the Democratic Party of Hawaii	<p>will the Army do to cleanup military debris currently on these sites caused by its helicopter and aviation maneuvering and training?</p> <p>Conclusion We believe that a comprehensive and objective analysis of U.S. military activities at MMR, KTA, and PTA pursuant to these 12 enumerated factors (Nos. 3 and 4 are combined in No. 3) will lead inexorably to the conclusion that the military needs to cease further maneuvering and training activities, engage in thorough clean-up of the sites, and return them to the people of Hawai’i not later than the original lease expiration date of August 16, 2029. It must also pay arrearages for the grossly insufficient lease rent. As described in Table ES-3 at page ES-9 of the Draft EIS, “[o]verall, implementation of the Proposed Action, through implementation of one of the action alternatives, would result in significant, adverse impacts on land use (land tenure), cultural practices (at MMR, and environmental justice.” Draft EIS, page ES-8. As such, we favor ES.8.4, the No Action Alternative. Under the No Action Alternative, the Army would not retain any of the State-owned lands at the O’ahu training areas after expiration of the 1964 lease in 2029, and as shown on Table ES-3: Summary of Environmental Impacts at page ES-9, the No Action Alternative will provide a significant BENEFICIAL IMPACT on the land use environmental subject area of evaluation. The environmental damages from the continued military training use at MMR, KTA, and PTA are in many cases, substantial. We continue to oppose further retention of the MMR, KTA, and PTA by the U.S. Army as the risk of damage to the environment and ecosystem are great and the likelihood of substantial restoration efforts are low to the detriment of the Native Hawaiian community, the community at large, and endangered plant and animal species, many of which are indigenous of and endemic to Hawai’i. The Environmental Caucus of the DPH objects to the retention of the MMR, KTA, and PTA State Leases after their expiration of August 16, 2029, and requests that the U.S. Army adhere to the NO ACTION ALTERNATIVE. The basis for this opposition rests on the National Environmental Policy Act (NEPA), HEPA, Section 106, Case v. Ching, supra, and the Hawai’i</p>	Please see General Response.

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		State Constitution on the Public Trust Doctrine and Precautionary Principle. Mahalo for the opportunity to provide these additional comments.	
Malia Agustin		Aloha, my name is Malia Agustin and I am a resident of Nanakuli Hawaiian Homestead. I am writing as a representative of the Nanakuli-Mailii Neighborhood Board Chair of the Land & Water Committee tasked with advocating for the wellness of our ā’ina (land) and wai (water). There are many concerns addressed by this community over the Retention of Training Land for the Army, specifically Makua Military Reservation (MMR). While the damage to the land for the purpose of military training is irreversible, the restoration and conservation efforts of Makua Valleys cultural sites are a step in the right direction. Being that MMR will no longer be conducting on site munitions training, a suggestion would be to make this area a conservation site and not allow any further development by the army or the state of Hawaii. Sincerely, Malia Agustin, Secretary Education Committee Chair Land & Water Committee Chair Nānākuli-Mā’ili Neighborhood Board # 36 Email: [REDACTED]	Please see General Response.
Rexie Ah Chong		I'm sure there are miles of testimony being sent for why the military leases should end, including environmental, cultural and socioeconomic issues that cause more damage than good. I don't feel the need to restate all that is being said because I highly doubt someone sits through and reads all these comments. The main message is the military is ruining a way of life continually over generations. The American military needs to seek practices elsewhere - too much damage has been done here.	Please see General Response.
Puaena Ahn		No Action for KTA, Poamoho, MMR. Let the leases lapse and give the land back.	Please see General Response.
Silvia Ahn		As the army's lease to O'ahu lands end in 2029, I as a concerned American citizen and advocate of the original stewards of the land implore you to reconsider not renewing the army lease. Hawaiian	Please see General Response.

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		lands need to be revitalized and protected by the original stewards to continue sustaining the vitality of the islands whether it's taking care of the aina itself or allowing space for Hawaiians to own more of their own land. Please do not renew the lease for the good of our future generations and land.	
Ka'imina O Kapono Ahu		I was born and raised on Oahu, as were my family and my ancestors. I am a relatively new mother of two year old little girl. My wish for her, is to grow up in the same way I was- on her native land, with her native people, learning her native culture. The land is directly tied to the survival of Hawaiian people and Hawaiian culture. In a land that was forcibly stolen from its people, we need to begin now, making amends and working toward restoring and healing our fragile and precious island(s), before it's too late for our keiki. NO extended lease on OUR lands!!! Reparations need to be made now!	Please see General Response.
Darin Aihara		<p>This comment is related to the noise pollution and lack of Pilot accountability when the Helicopters fly from Wheeler Army Airfield (WAAF) to the Army Training Lands on the North Shore of Oahu and back. The 25 I.D. and the Combat Aviation Brigade (CAB) does not hold their Pilots accountable for flying above their flight plan floor and also has no respect for the surrounding community by flying at abnormal hours in the night with multiple flights. There have been instances where the jealousies in the houses physically rattle because the aircraft are flying so low that they actually vibrate the houses. Furthermore, the CAB regularly flies missions throughout the year during hours when most of the community is sleeping. I.e. between the hours of 11PM and 6AM.</p> <p>Many complaints have been sent by the community during using the Army Complaint Line however, the Army does not do anything about it. The Army requires a ridiculous amount of detail when filing a complaint such as what was the tail number of the aircraft, the time of the flight, the direction of the flight that they require the complainant to record however, why can't the Army police their own personnel for following the rules. At least if the community sees their folks monitoring their pilots within the community where</p>	<p>Monthly training advisories are published to alert the public and neighbors of upcoming training activities that are louder in nature and may be heard outside the military installation. In addition to these notifications, USAG-HI has established internal policies and standard operating procedures in an effort to minimize training noise and its impact on the community.</p> <p>The issue of noise and its effects on the neighbors of KTA are discussed in Section 3.8.5.1 of the EIS. The EIS states that pilots and crew would continue to receive a briefing designed to minimize noise impacts on, and disruption to, local communities and neighborhoods as aircraft transit to and from KTA. Land retention could require further limitations associated with noise. Although this would be subject to negotiations, a possible result may be greater restrictions associated with noise than are currently required.</p>

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		<p>the complaints are generated, it shows they are taking the complaints seriously. However, not once did any Army personnel ever observe one of the pilots flight patterns to determine if the pilots were following protocol in their current Flight Operations Plan. The only time they actually adjusted their flight patters was and actually was respectful to the lower Wahiawa community was when Senator Kai Kahele's office actually sent in a congressional questioning the noise pollution created by the low flying aircraft. However, the low flying and ungodly flight times have resumed. The State of Hawaii should not renew the lease for the Army Training Lands on Oahu until the 25th ID and the CAB changes their Flight Operations Manual by figuring out a way to be respectful to their surrounding neighbors as well as specifying a policy where they regularly monitor their own pilots by following the proper flight patterns in the surrounding community. If the Army cannot hold themselves ACCOUNTABLE, they do not deserve to utilize State lands for training because they lack the respect for their neighbors. Better yet, the Army should request a change to the FAA approved flight path to and from the North Shore of Oahu to be removed from flying over the Wahiawa Community and make it where the FAA flight path is completely over Schofield Barracks and agricultural land. Again, unless the 25 I.D. and the CAB make changes to their current behavior, the State of Hawaii should not lease any more training lands for them to use.</p>	<p>Information on existing managment measures is listed in the "Airspace" discussion in Section 3.1.4 as well as in Appendix J of the EIS.</p>
Kaliko Aiu		<p>Aloha, kakou. My name is Kaliko Pua Hale Aiu. I learned -- I was privileged; I am privileged to learn from Uncle Sparky that the Kahuli snail only sings when the aina is happy. Generations currently and past have yet to hear the Kahuli snail sing its song. . . . After visiting Makua, I got inspired to write a -- a short song. I'm just going to share a little bit of it. . . . (Singing) Kissed away a clearing on my tongue. Their way -- sorry. Kissed a way a clearing on my tongue. Burned it slowly in the dark. Making room for kamakani in my lungs to sing for lands swallowed by the sun. I know the keiki they understand. I know they'll be okay. They're asking about the waters they'll find a pono way, remembering our</p>	<p>Please see General Response.</p>

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		<p>kupuna learning how to say their names. . . . . Ho'okupaa e lahui, e ala e, Ho'okupaa e lahui, e ala e, Ho'okupaa e lahui, e ala e . . . . . Mahalo. I hope we get to hear the Kahuli snail sing again.</p>	
Kumella Aiu		<p>I would like to ask that the military provide a different option. An option to clean up and vacate the land by the end of the lease. There is a critical shortage of land for Hawaiians and this land will take decades to restore. That restoration needs to begin as soon as possible. The military's use of the land has cost millions of dollars of lost opportunity in housing, tax revenue, and agricultural land. The current usage has caused environmental impact to the people neighboring these sites as well as the fragile and valuable ecosystems. There is a fundamental lack of shared values between the US military and the Hawaiian people. It is time to return that land to the stewardship of The Hawaiian people.</p>	Please see General Response.
Melva Aila		<p>Aloha, my name is Melua Aila. I have lived in Wai'anae all my life. I am a STRONGLY AGAINST ALTERNATIVE 1, 2, AND 3. I STRONGLY SUPPORT: THE NO ACTION ALTERNATIVE (No retention of State owned lands after 2029).          The Army has State lands for over 65 years and they have demonstrated and proven how well they care for the land. Army needs to RETURN LANDS to the WAI'ANAE COMMUNITY. PAY COMMUNITY A "BILLION DOLLARS plus" for the cost of CLEAN UP. RESTORATION, REHABILITATION, and most IMPORTANTLY the HEALING OF MAKUA VALLEY. Mahalo for your time, Melva Aila.</p>	Please see General Response.
William Aila Jr.		<p>Excuse me, Colonel. Okay. So, for the record, my name is William Aila, Jr. I think I have to say for that young lady Hauffie it's really important that you understand that her testimony was that of an individual and not of an official that Kukui Army with restoration, so it's very important that that point is clear. . . . . Okay. So I prefer the no action alternative. That the Army keeps its promise made to Uncle Ivanhoe in 1941 and all the other families who were forcefully removed. They didn't -- they didn't give in. They didn't want to move. They were removed by gunpoint. They had an hour to load all of their ukana on the truck and they were placed just on the other side of the hill at Ohiki-Lolo. And Uncle Ivanhoe was told</p>	Please see General Response.

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		<p>by the people who had the guns drawn on them that no worry, after the war you guys can come back. Okay. . . . . So the war was done, I think, in 1946, '47. My history is a little bad, but he tried to come back. And then in 1963, when that lease was about to expire, Uncle Ivanhoe with the help of other folks went to the legislature to try to get the 1964 lease not expanded. . . . . So I would say not only return the acreage that you're talking about, the 400+ acreage, but also return the 4,000-plus acres of cedar lands that were taken during that wartime. It wasn't with the permission of the people of Hawaii. Yeah. . . . . Very important about this question. He who controls the question, controls the answer, so this is for the EIS. The EIS is flawed. The real question should be what is the impact of a hundred years of military occupation of Makua on the generations of people from Waianae? That really should be the question. We should be studying that. . . . . And then so I did read, I would say, about three-quarters of the EIS, but I got so frustrated that I stopped. So here's why. In the purpose and need section specifically to Makua because I'm speaking -- because I was brought here by Uncle Ivanhoe and Auntie Frenchie DeSoto, my involvement in Makua is mainly to those kupuna and other kupuna, so I'm going to speak mainly to Makua. . . . . So it says the Army needs state lands for, and then a number of conditions. The lands are essential for connecting maneuver areas throughout the Island of Oahu, Makua, no. There is critical U.S.-owned facilities and infrastructure located on the state lease lands. The answer is no. . . . . The retention of state lease lands at Makua is important for non-live fire company size training. The answer is no. The lease -- oh. The loss of state lease lands would result in impacts to the mission critical training of the Army because they would have to move to other maneuver areas, other lands are not available. That's not true. Other lands are available, and I will point that out in just a second, so, again, the answer is no. . . . . So the four or five critical things that you -- your EIS says is important for Makua to be released no, no, no, no. The answers are very clear no, no, no, no. You have alternatives to that. . . . . Now, I want to point out that I looked at</p>	

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		<p>all the places that you listed that were alternative training areas, and one thing that stood out to me -- and I understand it now after reading it -- is because the question that's flawed is what is the impact to the Army of the loss of state leased lands? Okay. . . . So the analysis is flawed because that's the only thing that it looks it. When in reality --I'll give you an example. Let's say this park over here for football training for the Pohakuloa kids was lease lands, state leased lands, and you came to us, and you said, hey, we absolutely need that --that field over there because without it, you know, our team is not going to be good. But you don't tell us that you're using the field in Makua, the field in Waianae, the field in Waianae Valley, the field in Nanakuli, and the field some place else. You're not telling us what the alternatives are. . . . Never once is Schofield mentioned as a place where, let's say, the training you want to do in Makua, aviation, i.e., helicopters and unmanned aerial -- unmanned aerial drones. Okay? You can train with drones anywhere that you have land right now, including Schofield, but Schofield is not in here. . . . So if Auntie Frenchie was here this is what she would say to you, because I know Auntie Frenchie pretty good. She'd say, what, look like I got stupid written on my forehead? Wait. I got to turn around. I got to look. Nobody gets stupid written on their forehead over here. . . . So the EIS is a bunch of shibai. You try to focus our -- our attention on what is the impact to the military on these specific lands, but there's no analysis of other lands that are already available to you where you're flying helicopters and where you're flying these unmanned drones, and so that is a critical flaw. . . . I suggest you go back and talk to the attorneys, especially in light of the Supreme Court's decision regarding Chevron where there's deference to the official government agency anymore. It's not we got to defer to you because you know what's best. It's, like, let's -- let's go deal with the facts. . . . And the fact here, Colonel -- and -- and I like you, you're a good guy. The fact here, Colonel, is your EIS is flawed. Your analysis is flawed because you're hiding the ball from us. So how can we truly comment if you're hiding the ball, right? . . .</p>	

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		<p>You're only telling us about that football field over there, but you're not telling us about all the other football fields that you already get training. And that maybe with all those football fields you have enough training. You don't need that one over there, so you don't need Makua. You can give Makua back just as, I think, everyone in the audience is saying. . . . And please take this message back from Auntie Frenchie. We no more stupid written on our foreheads. Thank you.</p>	
Ka'apuni Aiwohi		<p>The Army is a leech that does nothing but take. Go somewhere that you are wanted and share your resources there. You bring a lot to the table, it's just not the table that wants you here.</p>	Please see General Response.
Kylie Akiona		<p>My name is Kylie Akiona, born and raised in Kipapa, known as Mililani, right next to Kipapa Gulch, where we also suffer the house trembling, booms, and gunfire from your colonial exercises. I am Kanaka Oiwī, Filipino, a descendant of veterans. And like all of us, I perpetually refuse your presence here. It's hard just to stand here and think about how you have been able to lease stolen native Hawaiian lands for \$1, when our people are sleeping in the streets, houseless in their own home, in the ground and poor, without ever being selected from an endless waitlist, while you and your other settler pawns of the US empire freely flock into houses on your bases and in our -- and into our hometowns. I am standing here today with my fellow aloha, 'aina and allies to tell you that we will not accept our land being occupied any longer. You will keep hearing from us and seeing us until you return what is never yours and has never been yours. We will not stand down until we take our land back for ourselves. We will continue to show up, meeting after meeting, and generation after generation, until we are all free from your empire; not just here in Hawaii, but in Palestine, Guam, Puerto Rico, Philippines, Turtle Island, across the Pacific, and beyond. We are not happy natives, and you are not in America. We are done with your military exercises, your RIMPAC, your fake state government, your extreme violence against our lands, waters, and bodies. We demand a future where your oppression and poisoned waters are not normal, where we can once again freely steward</p>	Please see General Response.



Commenter	Submitted By	Comment	Response
		<p>Poamoho, Makua, Kahuku, and all of the lands that you temporarily occupy. Your simple existence, sitting there at that table in your uniforms, bearing your genocidal flag, having us beg for our genealogical land back, is a violence that we do not accept.· I mahalo everyone that shared their mana'o tonight, except for that one faka, and I echo your thoughts and your sentiments.· End the leases, and de-occupy Hawaii now.· Mahalo.</p>	
Noelani Akiona		<p>My name is Noelani Akiona, born and raised in Kipapa, now known as Mililani, right next to Kipapa gulch where we constantly and deeply suffer not just the house trembling booms and gunfire from your colonial exercises; but from the lasting harm and oppression that your military occupation brings to this ‘āina. I am Kanaka ‘Ōiwi, Filipino, a descendant of veterans, and like countless people providing testimony and comment, I perpetually refuse your presence here. It is devastating in and of itself to just exist here on my genealogical lands besides my family who has stewarded these islands for centuries and think about HOW you have been able to lease stolen Native Hawaiian lands for ONE DOLLAR when our people are sleeping on the streets, houseless in their own home, in the ground and pō without ever being selected from an endless waitlist while you and other settler pawns of the U.S. empire freely flock into houses on your bases and in our hometowns. The same bases where you colonizers flock in and out desecrating our land, our women, our māhū, our children, our waters, our communities, and more. I stand firm with my fellow hoa aloha ‘āina and allies to tell you that we will not accept our land being occupied any longer. You will keep hearing from us and seeing us until you return what was never yours. We will not stand down until we take our land back for ourselves. We will continue to show up meeting after meeting and generation after generation until we are all free from your empire; not just here in Hawai‘i but in Palestine, Guam, Puerto Rico, Philippines, Turtle Island, across the Pacific, and beyond. We are not happy Natives and you are not in America. We are done with your military exercises, your RIMPAC, your fake state government, your extreme violence against our lands, waters, and</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>bodies. We demand a future where your oppression and poisoned waters are not normal, where we can once again freely steward Poamoho, Mākua, Kahuku and all of the lands you temporarily occupy. Your simple existence, breathing on our land, in your uniforms boasting your genocidal flag, having us beg for our genealogical land back, is an extreme violence that we do not accept. End the leases and deoccupy Hawai’i. E mau ke ea o ka ‘āina i ka pono.</p>	
Sue Alana		<p>Aloha I believe that the military has over used the lands on Oahu. It's time to move on and allow the people of Hawai'i that have been affected by taking their to heal. Mahalo</p>	Please see General Response.
Donavan Kamakani Albano		<p>Aloha, My name is Donovan Kamakani Albano, and I am a Kanaka ‘Ōiwi resident from Kalihilihiolaumiha, O’ahu. My comments related to this EIS goes as follows: Time and time again, we see the impacts of military presence on Hawaiian lands as have caused extensive damage to our natural environment and resources, including water. The three army facilities related to this EIS are home to many endangered and threatened species, and simultaneously, illuminates the retaining of 6,322 stolen Hawaiian Kingdom lands. Another problematic aspect is that the DEIS only assesses a small portion of what the Army controls, since it does not include the federal hands held by the Army on these sites. Kahuku, Mākua, and Poamoho, as are all Hawaiian lands, are sacred sites where ‘Ōiwi ancestors' bones are buried and have been desecrated in the name of militarism--and military occupation of the Hawaiian Kingdom, specifically. These conversations around the 65-year leases requires that the Army and the entire U.S. military engage plans to return these lands the way that we were before military use, and must be cleaned up properly as the environmental impacts are severe. And we know that there has been mismanagement and circumventing of processes that have not been transparent. As you engage these conversations related to this DEIS, it is clear that you must listen to the Native peoples whose lands and waters we are genealogically</p>	Please see General Response.

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		<p>connected to, and have our ancestors buried on these sites. We remember the threats to our genealogies and we remember these sites as deeply sacred and will continue to protect them indefinitely.</p> <p>Mahalo for the opportunity to provide comments.</p>	
Lea Ellen Albert		<p>Aloha, I fully support the use of the area in Kahuku, Makua, and Poamoho, with the modifications or without them, in the proposal read by the colonel on July 10, 2024 at the meeting at Kahuku High &amp; Intermediate School. I was present at that meeting. I fully support the use of these lands by the United States Army for their practice, or preparation, and ask only that the military be good stewards of the land and water. Leases of these lands on O‘ahu need to be assigned to, and for, the United States Military. I am also fully aware of all the good things that the military does to help the people of Hawai‘i. Sincerely, Lea E. Albert</p>	Please see General Response.
Nancy Aleck		<p>This is NOT a FONSI</p> <p>To the Generals and the DoD officials; to the entry-level ranks who forever will be "following orders;" to the elected and selected officials continuing a legacy of pork hoarders, a mantle picked up by so many striving towards what appeared to be a shining sword wielded by the late Dan Inouye:</p> <p>I do not imagine that my testimony or my plea will change the course of things—right now. I'm in the books for submitting testimony at past meetings, scoping sessions, EIS hearings. Like so many others, unheard, ignored, and the beat went on.</p> <p>But every time we show up, we collectively strain the fabric a bit more. Someday, a giant rip will set the aina free. Many are already preparing for that time, caring for the aina, exploring new forms of economics, guiding themselves and each other in kapu aloha.</p> <p>I was there when we were unheard and ignored in calling for an end to the Vietnam War. It took years, but our cries not only began to be heard but respected, and popular opinion shifted.</p> <p>This is NOT a FONSI</p> <p>What has been done to Makua, Kahuku and Wahiawa—and continues at Pohakuloa—it is all hewa. Most horrific. Irresponsible</p>	Please see General Response.

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		<p>and wrong. I believe deep down some of you may feel this already. Surely, your children will know, and carry the weight of what you perpetuate.</p> <p>Shame on Hawaii "officials" who then and now allow these leases to continue and defile the land. When our pressure rips the fabric of militarism, the light will shine through and the land will thrive.</p> <p>My preference is: NO LEASE RENEWAL! My preference is: all military presence and occupation ENDS.</p> <p>Realistically, this is a pipedream in my lifetime. Whack-a-mole. Should the US military de-occupy Hawaii, you would go somewhere else, likely where the people don't get any say at all.</p> <p>So, I say that you must, for now, act responsibly. Clean up many decades worth of toxic and life-threatening damage. And stop desecrating the lands you have been using so freely—literally (\$1) and figuratively.</p> <p>This is NOT a FONSI</p> <p>Very Sincerely,                      Nancy Aleck</p>	
Jason Alexander		<p>I do not consent to any retention, extension, or renewal of leases in Hawai’i to the DoD — which is heavily-evidenced to have no intention of abandoning its structure of exploitative harm to Hawai’i’s ‘āina and wai — and must not be renewed or created in any new contracted form. Entering into planning phases to assess new lease terms is only beneficial if it determines that the cost is priceless, or if you instead assess the immense amount the DoD needs to pay the people to fund programs to fully clean up and atone for its decades of cumulative harm and theft of prosperous futures. Too many of the harms the US military has been inflicting on the environment are permanent and cannot be remediated or absolved through shallow apologies to the next several generations, who will have to live through increasingly submerged and poisoned seascapes.</p> <p>An honest EIS would heed the countless voices of Kānaka Maoli communities foremost, and any findings of "no significant impact" cannot be trusted, as the track record of the military-industrial</p>	Please see General Response.

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		<p>complex's environmental destruction in the Pacific islands continuously reveals.</p> <p>Continuation of military leases only accelerates species extinction, toxic contaminant release in the lands, waters, and air, genocidal violation of sociocultural heritage and indigenous lifeways, insufficient transparency and accountability mechanisms in the review process that coerces consent, and the increasing marking of homes as a sacrifice zone to be targeted in the "FOIP" arms race.</p> <p>Return O'ahu's lands and demilitarize to truly serve who you claim to protect.</p>	
Barbara Allsmas		<p>Aloha. My name is Barbara Allsmas. I'm a resident here in illegally occupied Hawaii for almost 40 years, and I raised my daughter here on the island of Oahu. I'm forever grateful to my kanaka brothers and sisters for the love, support, and welcoming they have given my daughter and myself, and a life we could never have imagined or dreamed of in this beautiful, sacred 'aina. And I'm forever grateful for this sacred, beautiful 'aina that has nourished and cared for us in all ways. I'm here to stand with my brothers and my sisters, insisting that the US military pack up and go home, clean up your toxic mess, and give reparations for the damage caused to the Kanaka Maoli, so they may heal and build back their lives for themselves, their children, and future generations. As a family therapist and human being, I have and continue to witness immense pain caused by the US military. You have come to a land of peace and aloha, and brought your mindset of killing and destruction. The -- these -- the people in these islands have lived sustainably for thousands of years, and today so many are houseless, hungry, lonely, and living a life of misery and suffering. Before you came, people took care of one another, and there was a system that cared for the land and the people. I have some questions I have for you, and I hope you bring these questions back to your so-called superiors and to other military personnel. What gives the US military the right to destroy what is sacred to the people of Hawaii? How do you justify stealing, desecrating, and destroying 'aina and the lives of the people in these beautiful islands? As an institution and as individuals, what do</p>	Please see General Response.

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		<p>you tell yourself to justify committing such crimes?· How much of your humanity are you willing to give up for whatever selfish benefit you get in money, power, or whatever it is you believe makes it worthwhile, that causes much pain -- so much pain and suffering for the people and all of our relations who live in the ocean and on the land and who fly in the air? You may justify what you are making, that you are making the world safe.· It is insane that the US military says it is making it safe for people of America, quote, unquote as it poisons the land with its war exercises, embalming with depleted uranium, white phosphorus, and countless other deadly chemicals, and more.· And the irony is the Kingdom of Hawaii was illegally overthrown violently by the US government, and to this day, illegally occupies this land that is called, quote, unquote, "America," as it kills and destroys it. [THE MODERATOR:· Ma'am, please wrap it up.] Your institution adds -- I'm almost done -- and is able to kill your own personal military personnel as well, poisoning the water and the land that they're living on. This is true not only in Hawaii, but all over the US and the world.· You try and force the identity of being American, quote, unquote, on kanaka, and at the same time, do not recognize the humanity and the right to exist as a sovereign people in their homeland. Who are you keeping safe?· How can a people be safe if they don't have a healthy place to live?· My focus is on healing.· And there can be no healing without justice.· My focus is on recognizing truth.· And the truth is that the US military has violated laws, moral, ethical and legal, national, international. My focus is also on being a good human being.· And human beings -- as good human -- as human beings, we have the capacity to reflect, look within, be honest with ourselves and others, and to make things right that are wrong.· We have the ability to have empathy and compassion.· I've grown up with many cultures, and the focus on being a good human being is a quality that healthy cultures embrace and live. I'm passionate about helping to create a safe and healthy future for our children and future generations.· And I understand that it is only possible if we each are truthful with what</p>	

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		<p>it means to be good human being, caring for ourselves and all of our relations. You have the opportunity to be a good human being, standing on the right side of history, and taking what you are hearing from the people of Hawaii to your superiors and everyone you know, and fighting like hell to ensure that the kanaka here in Hawaii are given the right to live as they choose on their sovereign land, without the presence of the US military. Stop the leases. Stop the land leases and the abuse of the land and the people of Hawaii. Enough is enough.</p>	
Ariel Alon		<p>Land back to the Hawaiian people. You have stolen and destroyed these islands, leave and let the original stewards repair what you've done.</p>	<p>Please see General Response.</p>
Kaliko Amona		<p>Aloha. My name is Kaliko Amona. I live in Pupukea, Oahu, North Shore. And I'm here tonight also in opposition to the Army's retention of the lands in discussion tonight and all lands in Hawaii. Speaking to the EIS, the no-action alternative is the only acceptable alternative in the draft, if we're going to talk in -- in that kind of language. I'll be sending in written testimony, but just sharing a portion of my thoughts tonight, and really getting back to, like, the theme of the last few testimonies, on sound. Living in Pupukea, where my three kids were born, from little -- like, these babies, they've been subjected to -- I've been subjected to that, the sound of that -- that gunfire, the explosions, the bombs, the war noise, these flights over our house, shaking our -- our tiny little old cottage house, Quonset hut, shaking it, and having to, again, answer to my kids, you know, that are much older than -- than these little babies. "Oh, what is that?" "That's -- that's the military doing their thing." And I thought I would see something like that in the EIS. I'm sure it's been talked about before, in scoping meetings. So went to the Noise section of the EIS, and just saw -- you know, it's in the language of decibels and how loud something is. Nothing about the nature of these sounds and what it does to people and what it means to people. It's, like, this constant taunting and terrorizing, this soundtrack. And also in the Noise section, it talks about, "Oh, we think it's likely that the bats and the birds, they habituate to</p>	<p>Section 3.8.5.1 discusses current mitigation measures, which include monthly training advisories are published to alert the public and neighbors of upcoming training activities that are louder in nature and may be heard outside the military installation. In addition to these notifications, USAG-HI has established internal policies and standard operating procedures in an effort to minimize training noise and its impact on the community.</p> <p>To alert USAG-HI of a specific noise complaint, please call the Community Concern Line at (808) 787-1528 or send an email to <a href="mailto:usag.hawaii.comrel@army.mil">usag.hawaii.comrel@army.mil</a>.</p>

Commenter	Submitted By	Comment	Response
		<p>these sounds. Like, not a problem." And as I was reading, I'm like, "Oh, they probably think, like, we have habituated to these sounds as well," and not just to the sounds, but the presence entirely. So we have not habituated. It has been a constant negative impact. And it's time for these leases to end and not be renewed. Thank you.</p>	
Chloe Amos		<p>As a local citizen born and raised on O'ahu, I believe that the presence of the U.S. Military in Hawai'i can only do harm for the precious ecosystems and environment of Hawai'i. The Army admits to harming the land and environment in the Draft EIS. They admit there will be "significant adverse impacts" on land use (land tenure) and environmental justice with the retention of any lands at Kahuku, Poamoho, and Mākuā.</p> <p>The Army does not commit to clean up these lands until after the EIS is finalized, and vague terms in the 1964 leases do not require future clean up actions.</p> <p>The U.S. military has never returned Hawaiian lands in any usable state. The public has no reason to believe that the military will do an efficient, just, or effective clean-up job for the damage they cause in any lands, especially after the long process we experienced in the clean-up of the Navy's Red Hill fuel leak which caused irreparable harm to civilians as well as the environment--including civilians directly affected with physical harms and all future generations of O'ahu inhabitants who will always have to deal with the irreparable strain that the leak has put upon our clean freshwater supply. The Army's cleanup commitments are limited by economic feasibility which could very likely leave contamination unaddressed.</p> <p>The DEIS fails to address the cumulative effects of military training on both state and federal lands. Hazardous substances on federal lands pose a risk to state lands and surrounding communities. Furthermore, the lands in Mākuā, Poamoho, and Kahuku are home to dozens of endangered organisms found nowhere else in the world.</p> <p>The Draft EIS underestimates the impact of noise and other training</p>	<p>Protected species at KTA, Poamoho, and MMR are discussed and analyzed in Sections 3.3.5.1, 3.3.5.2, and 3.3.5.3, respectively. Additional noise studies that address impacts on native and protected species have been included in Sections 3.3.5 and 3.8 of the Final EIS.</p> <p>Section 3.6.5 revised to clarify that 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 lands not retained). After the existing leases expire, the Army would follow applicable regulations to determine how and when the cleanup and restoration of State-owned lands not retained would occur.</p>



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		<p>activities on native species, providing insufficient evidence for its conclusions.</p> <p>A major factor of consideration in any environment is also the human population. The presence of military personnel exacerbates housing competition, decreasing the availability of affordable housing and impacting local residents, adversely impacting local residents and contributing to the displacement of many Kānaka Maoli and local families.</p> <p>The DEIS does not assess the impact of continued military operations on an island already facing a housing crisis.</p>	
Kelsey Amos		<p>The Army's impacts on O‘ahu need to be assessed in the full context of all military installations active on the island. By looking at them piece by piece you do not get the full view of the impact in terms of the effects on the environment, the impact on the ability of Native Hawaiians to perpetuate and practice their culture which relies on access to land, the opportunity cost of what could be done with these specific lands if not under Army use, and the impacts on local residents of the full military footprint on this island.</p>	Please see General Response.
Pelika Andrade		<p>I do not support the army training land extension. Lands historically have been misused and abused. Lands currently slated for army training continue to displace Native Hawaiians while ensuring future access and productivity be minimal or non existent (infrastructure and unexploded ordinance being left behind). In addition, the relationship between military and native Hawaiians have been lacking as it is very one sided leaving Native Hawaiians continually feeling the legacy of colonialism. There is very little give back and benefit to the native Hawaiian community and Hawaii as a whole. Environmentally speaking, the habitats are extremely vulnerable hosting some of the most threatened species in Hawaii and the world. Makua Valley and Pohakuloa training are leeward and historically dry forest habitiat, one of the rarest in the world. Hawaii has high endemism which is also due to the dry forest habitat. For all the reasons; environment, social justice, and native rights, the army training lands should NOT be extended.</p>	Please see General Response.

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Denise Antolini		<p>DEIS Comments only re: KTA Tract A-3 Pūpūkea/Paumalū Tract A-3 - in the ahupua'a of Pūpūkea/Paumalū - is designated State Forest Reserve, is home of the 1.9 mile Kaunalu Loop Trail (managed by DOFAW), a hunter check in station, a small picnic pavilion, and portions of Drum Road - all of which are heavily used by the community for recreation. (Fig. 2-1)</p> <p>Tract A-3 is NOT used by the Army for any training (maneuver, reconnaissance, assembly, force-on-force training, or deployment training) - see 2.2.1 - or range, impact, or cantonment areas - see 2.2.2.2). (Note: 2.2.1.7 should be corrected to state that Tract A-3 is not used for confined LZ training.).</p> <p>Essentially Tract A-3 is used only as a "buffer" and allegedly for "aviation overflight" training (2.2.2.3) (which is not significant given it takes 2 seconds for the overflight to cross A-3).</p> <p>The DEIS acknowledges that A-3 has NOT been used for any training purpose for the past 20 years (2.2.2.3, p. 2-12). Tract A-3 is a KEY natural area for the public that is highly valued for a diverse group of users - from hikers to hunters, local families to visitors. In the higher elevation areas, A-3 contains native forest including rare sandalwood trees.</p> <p>The DEIS does not fully evaluate that an extended lease would put this special natural area at risk as the Army could simply change its policies about the use of this area, limit public access, and cut off or damage a valued public recreational resource.</p> <p>The continued lease for Tract A-3 is not justified by any stated military purpose according to the DEIS. The only stated purpose - "buffer" - would be served equally well if the lease were discontinued because the area is already designated State Forest Reserve - in public hands and not at risk of private development or habitation.</p> <p>The DEIS does not adequately analyze the potential loss of recreational and natural resource values from a renewed lease of Tract A-3.</p> <p>Therefore, the lease for Tract A-3 should NOT be renewed and full ownership should revert to DLNR-DOFAW so that the area is</p>	Please see General Response.

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		<p>maintained and protected in perpetuity as a public recreational resource.                      Thank you.</p>	
<p>Destiny Joy                      Antonio</p>		<p>I am fully against these leases being renewed and the lands going into the hands of the military. The US military has always posed a threat to Hawaiians and the islands. I strongly oppose that this lease continue, and I strongly support that these lands be returned rightfully to the Hawaiians for their usage.</p>	<p>Please see General Response.</p>
<p>Anthony Arce</p>	<p>LAING Hawai'i</p>	<p>LAING Hawai'i, is a group of heritage language advocates and educators who support the health and wellbeing of the Hawaiian Islands and people. Our mission is to perpetuate, promote, preserve, and introduce the various heritage languages and cultures of the immigrant population of Hawai'i and the continent and to use them for heritage education, social services, language and cultural access, and people empowerment. We encourage young people to speak and learn their native languages and be proud of their cultural heritage. As people of the Philippine diaspora, we recognize that we are not from this land, but we call this 'āina home. We recognize the similarities between the U.S. Military occupations of both Hawai'i and the Philippines and we strongly oppose the renewal of leases for Military training and testing sites in Hawai'i and demand the immediate return of land to Kanaka Maoli, stewards of these islands.</p> <p>The issue of land rights and military leases in Hawai'i is pertinent to our work as language advocates because languages are based in the land and our environments. Our ancestral vocabularies developed as a result of our relationships to the land on which we lived. Hawaiian language and culture is no exception, with rich language traditions emerging from unique and diverse landscapes, such as the ones that continue to be devastated by military occupation today. We echo the sentiments of the thousands of other testimonies calling for an immediate end to Military leases and a return of the land to Kanaka Maoli stewardship.</p> <p>If land is being threatened and actively destroyed, so too is language and culture. This is a documented truth that has</p>	<p>Please see General Response.</p>

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		<p>continued to impact indigenous peoples around the world, from the Philippines to Latin America to Africa. Much of this threat comes from global military land usages.</p> <p>The U.S. Military leases 4,390 acres of land in Poamoho for \$1 for 65 years, 1,150 acres of land in Kahuku for \$1 for 65 years, 782 acres of land in Makua for \$1 for 65 years. In contrast, many Native Hawaiians in Hawai‘i do not own their own home and are also disproportionately represented in our unhoused populations. According to a 2020 study by Partners In Care on Oahu, Native Hawaiians accounted for 51% of surveyed unhoused individuals, the highest of any ethnic group alongside Pacific Islanders and multiracial people. There are more than 28,000 Native Hawaiians on the Department of Hawaiian Homelands' waitlist still waiting to be housed. It is socially irresponsible and unconscionable to lease thousands of acres of lands to the U.S. Military while the Native People of this land go unhoused. LAING Hawai‘i vehemently opposes the renewing of these military leases and demands that the lands be returned to Native Hawaiian people under their stewardship and discretion.</p> <p>The military uses this land for live-fire trainings and bombings conducted by all of its branches. It also uses these lands to conduct war games, such as RIMPAC. Currently 29 militaries from around the world are participating in the bombing of this land and ocean, despite calls to cancel these "games". This type of "training" threatens the biodiversity of the immediate land and surrounding areas, through pollution and fires started through these exercises, including radioactive materials, heavy metals poisoning, and the damaging and destruction of water tables and waterways. The Hawaiian archipelago is widely regarded as the Endangered Species Capital of the World. The islands are home to endemic and native plants and animals that exist nowhere else in the world and which live within the lands leased by the U.S. military.</p> <p>Furthermore, with over 25,000 military personnel expected to participate in these "games" on US military leased lands an increase in sexual violence and human trafficking follows, especially for</p>	

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		<p>Kanaka Maoli women and girls.            This violence on land, water and people extends beyond Hawai’i.            The bombs and artilleries tested will be used to commit genocides by the U.S. and partnering nations across the globe, from the Philippines to Palestine. The military exercises practiced on US military leased lands here will be used to kill and oppress people across the world - we say NO!            As representatives of the Filipino community in Hawai’i, we know the history of colonization of the Philippines and how devastating military occupation and war is and continues to be on our communities. We refuse to allow Hawai’i's land and people to continue to be used for weapons testing!            The renewal of these leases further affirms the belief that the U.S. is justified in stealing land from Native Hawaiians, poisoning them and their land, denying them access to their culture, and killing them.            Simply put, to renew these leases is to participate in the genocide of Native Hawaiian people and their land. To renew these leases is to participate in the genocide of indigenous people across the globe.            The terminology for war in most indigenous languages - bomb, soldier, explosion - are colonial terminologies that did not exist in our immediate environments, but rather were introduced. We are raising up a generation of heritage-language speakers who know how to speak out against War, in favor of Peace, and in support of this ‘āina and all lands around the world that continue to be threatened by war and imperialism.            LAING says            NO to U.S. Military on Hawaiian Lands            NO to U.S. Military in the Pythilippines            NO to the U.S. War Machine</p>	
Isa Arriola		<p>I am writing to comment on the inadequacy of the EIS for Army Training Land Retention (ATLR) at Kahuku Training Area (KTA), Kawailoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O’ahu. The EIS fails to</p>	<p>The EIS notes the involvement of the U.S. in the overthrow of the Hawaiian Kingdom, for which the U.S. Congress apologized in 1993 (PL 103-150). Section 3.12 of the EIS acknowledges</p>

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		adequately address the concerns of the Kanaka 'Oiwj, whose population struggles to maintain rightful ownership over Indigenous lands. The U.S. military has shown over and over again that the concerns of the Indigenous owners of Oahu come second to military planning, and this EIS does not adequately incorporate the cumulative social, cultural and economic impacts that these plans have on the environment and people.	significant cumulative impacts on environmental justice, and addresses impacts on cultural resources, practices, and socioeconomics in Sections 3.4, 3.5, and 3.11.
Isa Arriola		U.S. military trainings on these installations are not environmentally sound and will continue to lead to biodiversity loss and irreparable damage to the environment in the long-term (even as a real estate action). What if live-fire training is proposed in the future even if this is not currently in the plans? <u>How will the Army implement appropriate oversight of the State-owned lands by other military services and the public?</u> The EIS process has proven to be a failure for adequately respecting the rights of Indigenous Peoples and garnering their consent throughout the Pacific-this EIS is no different.	The Army manages use of lands by other military services within the State-owned lands for the three O'ahu training areas the same as how it manages use for its own training activities. Use of the State-owned lands that are accessible by the public is managed by the State, such as for the Hawai'i Motorsports Association (HMA) motocross track on State-owned land at KTA. The Army has committed to not conducting live-fire at MMR, now or in the future.
Jennifer Arun		I strongly oppose the US government and the US military using and leasing land in Hawaii for military and other government purposes and activities.	Please see General Response.
David Ashe		Aloha, My name is David Ashe and I am writing to request that the US Army fully release their control over Kahuku training area, Kawailoa- Poamoho training area and Mākua military reserve which together make up over 6,320 acres of land on O'ahu. My comment will focus mostly on Mākua valley. I have been studying natural resource management at the university of Hawai'i at Mānoa for the past 3 years. Prior to going to college, I spent 4 years as an active duty Coast Guard member, stationed here in Hawai'i. I strongly urge you to let the leases on the lands expire and clean up the mess made by decades of destruction and neglect. According to the draft environmental impact study, published by the U.S. army Corp of engineers, Mākua military reserve has control of over 782 acres of land. Live action training has been totally	Section 2.5 of the Final EIS has been revised to state the No Action Alternative is identified as the Preferred Alternative for MMR (i.e., the State-owned land at MMR would not be retained). Under the No Action Alternative, as stated in Section 8.3.4 of the CIA in Appendix B, cultural access would no longer be restricted because the land leased to the Army would be returned to the State under this scenario. This is reiterated in the environmental consequences analysis of the EIS in Section 3.4.5.3, in particular for MMR.

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		<p>suspended since 2004 and yet there are still countless UXO's littering the land where food used to grow and families used to live. The environmental impact study is surprisingly full of information which supports my position on the matter including the proposed actions and alternatives analysis on <u>Page 187 section 8.3.4. which states "As discussed with Alternatives 2 and 3, if restoration actions, such as the removal of UXO, were successfully achieved with minimal impact to cultural resources, long-term, significant, beneficial impacts would result with the removal of limitations on cultural access for Native Hawaiians and cultural practitioners into the foreseeable future."</u></p> <p>For years, myself and many others have been told that the destruction and desecration of Hawaiian land was "essential" for military readiness and national security. I don't buy that narrative anymore. Neither does the community.</p> <p>The time has come to do the right thing and return these lands better than you found them. No more leases, no more destruction, no more excuses.</p> <p>Mahalo</p>	
Mahiemainalani Askew		<p>Aloha. I actually didn't plan on speaking. I really came here to observe and take in information. My name is Mahiemainalani. I am not from Wainae. My roots are in Mauanwili. My family is from Waimanalo and Kahuku. I'm sure you'll hear from my family tomorrow night. . . . . I work in property management, and I found out about this meeting through social media on Hungry, Hungry Hawaiian. So I want to echo what everybody else was saying. . . . . Obviously, I oppose the lease renewal that you guys are after. I really came here because I don't know what's going on. I feel like I represent the average Hawaiian that's not really in touch with hawaiiiana kuleana, right? I don't really know too much about what's going on in the community. My family just moved to Waianae a couple years ago. . . . . I work with kupuna. I have over 200 tenants on this Waianae Coast. I am part of the Leeward Housing Coalition. I'm interested in knowing what information can be given to our kupuna, to the average person in this community, to</p>	<p>Sections ES.12, 2.1, and 3.6 have been revised to include a summary that the Army would follow the CERCLA process in accordance with applicable DoD and Army regulations and processes. The CERCLA process includes phases such as preliminary assessment/site inspection, remedial investigation/feasibility study, remedial design/remedial action, and post-construction completion phases.</p> <p>Section 3.6.5.3 also provides information on current and past range management activities regarding MEC within the State-owned land.</p> <p>Impacts from these lease compliance actions (including removing infrastructure, signs, and</p>

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		<p>the ones that don't have roots to Makua, but we are <b>koku</b>a. That's what I'm interested in. . . . I would like to see, in the future if the military can start to tell us -- I'm not interested in your guys' plans, the EIS, all of that. I'm sorry. <u>I'm interested in the cleanup plans. I want to know how long it's going to take, what you guys need from us, how can we hold you guys accountable. If you guys tell us in 2029 poa the lease, you guys are going to clean up, how long is it going to take? Who is it going to affect?</u> . . . . I'm 33 years old. My daughter is here. I just got off work. I got to go to work tomorrow. I'm sure I'm not the only one, so I would love for in the future to know about your guys' plans just as a regular community person, just as a regular Hawaiian. I -- I don't have roots here, but I am part of the community. I oppose your guys' lease renewal. Mahalo.</p>	<p>weapons and shells, and reforestation) and cleanup and restoration actions are analyzed under the Land Not Retained and No Action Alternative headers in each resource area in Chapter 3.</p> <p>Section 4.2.4 discusses the reasons why specific cleanup and restoration activities, including timelines, after lease expiration are not able to be determined at this time.</p>
Amanda Aymar		<p>I don't support the military extending their real estate contract on Oahu, especially for the ludicrous amount it has leased it for. They denigrate the land and sea with war games, pollute and use up resources, and leave less housing for actual local people who love their home. The land should return to the people. The army itself said it best: " Continued loss of aina represents a disproportionate and a longterm, significant, adverse impact on communities with environmental justice concerns."</p>	<p>Please see General Response.</p>
Bronson Azama		<p>‘Ano‘ai ke aloha kakou. My name is Bronson Azama. I hail from the ahupua‘a He‘eia, on the windward side of O’ahu. The thing I'd like to share is, you know, when it comes to take us back to a time in 1849, when there was a relationship that was made and a treaty signed between the agents of the United States and Kauikeaouli and his heirs and successors. That was supposed to be a beginning of a relationship that was acknowledged as a treaty of friendship. Yet, after 1893 and the participation of the United States in an illegal usurpation of our government and our queen, we find 131 years of a bad friend, where legal solutions to our illegal problem are often deduced to being a political question, and not a legal one. When it comes to that relationship and that beginning of the crime that resulted in -- and that resulted in the beginning of a tarnished legacy, pollution, of not only our environment, but also the</p>	<p>Please see General Response.</p>



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		<p>geopolitical status that's happened across the world, how is the rest of the world supposed to believe that you're the good guys, as you illegally occupy a neutral nation state that suffers a, quote -- Mahalo -- a, quote, according to the United Nations Memo on Human Rights, "an illegal military occupation and fraudulent annexation." This is patient zero when it comes to Hawaii, in the relations that are happening across the world, to pretend that what's happening here, as others say, you know, this isn't compartmentalized when it comes to the lands and the designations that you folks have provided for us to look at. When we think about the same way the biosphere works and how it's all interconnected, it's the same for the politics and the human relation and harm that's caused here in Hawaii by the United States military. You know, there has -- one of the things that I'd like to bring up, in acknowledging that my time's a little bit short, is, as others have shared about this notion that Hawaii is supposed to be a space of healing, we're taught -- and I was taught by my kūpuna -- that peace is not the absence of war, but rather the fulfillment of harmony. And what peace has been brought as a result of your occupation, not only to here in Hawaii, but also across the world? It's gotten worse. So we need something better. I ain't going to experience another 50 years of this bullshit. To be quite frank, when we think about the turmoil that's happening across the planet, I would say it's time to return to Switzerland of the Pacific again. We're tired of all of this turmoil between these global superpowers, when it's time to elevate a blue consciousness. This is a blue planet. When it comes to the harm that the United States and other colonial powers are causing here in Hawaii and the ocean, we must remember that the Pacific is a third of the world's surface. The US, and the attempts that it's making to steal our lands in the remote Pacific islands through conservation and that's the biggest lie, that the United States is the best to conserve our resources. [THE MODERATOR: Bronson, I need you to 14 wrap it up.] When it's -- thank you. I'll wrap up. So when it's time for our future, the time and the opportunity is now. When it comes to the</p>	

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		<p>things that my elders taught me, it's that you have to clean your house first, before you go into others'. And when I look at -- when I look at -- when I look at the house that's happening on the continent, where geopolitical relationships -- and, not to mention, its own domestic problems -- are seemingly risky by political speeches made every four years, I think there's an opportunity and there's a need for the return of self-determination by the people of this place. In the words of Uncle Hank Fergerstrom, which I'll close on, "Show us the treaty." Because we're not going to pretend that these processes -- Mahalo -- because we're not going to pretend that these processes are supposed to be legal. As others have said, it's a seemingly charade. But I still believe there's an opportunity for people to do good things. And I hope that you folks can do the right thing and that we free Hawaii. Mahalo.</p>	
Fallon B		Hawaii is stolen land that the US shouldn't have in the first place.	Please see General Response.
William Babre Jr.		<p>Ho. Oh, yes. Loud and clear. You know I'm not nobody special. I just -- I like to say something. I like to say something. Born and raised over here in Waianae all my life. I know one thing, you military, the military government, you guys don't care about us Hawaiians. You guys don't care about us. . . . You guys take. You guys take and you guys destroy, brah. Everybody came up here before me, you listened to their voices. I don't know if you, Mr. Steve, can feel. You feel their hurt? Do you hear their pain in their voice from what these guys fighting for and what they go through? Because I do. And everybody else in this room do. . . . You guys just take from us. You guys take our sacred lands. And what you guys do? You guys drop bombs on them. Like somebody said earlier, no, you wouldn't like nobody come bomb your grandparents' grave, but you guys do that to us local Hawaiians and stuff. You guys do that. That's not right. And you guys just -- it's time for go home and give us back our land, and just give the Hawaiians back what we deserve and stop taking from us, guys. . . . Because you guys just killing our culture. We're already dying, fading out, but you guys adding to it. You guys just destroying our lands, killing our culture, and that's not -- that's not nice and that's</p>	Please see General Response.

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		<p>not right, and you know that's not right.· So enough is enough.· Thank you for being here and taking this all in.· Aloha.· You have a good one.</p>	
<p>Alexandra Balgos</p>		<p>Hi. My name's Alex and I work in Kahuku. I'm a community organizer with Affirm Hawaii. We are a transnational feminist organization committed to the liberation of women, girls, and gender expansive kin from the violence exacted by colonial institutions that desecrate sacred land and leave its original caretakers destitute, like the thieving United States. I'm here today to voice our strong opposition to the retention of the U.S. Army's lease on state land, all 6,322 acres of which and more are actually land that was stolen from the Hawaiian Kingdom. These lands are sacred. They have been lovingly tended and cared for for millennia prior to U.S. contact, Western contact. They hold the stories of descendants who have lived here and do live here to this day, despite its increasing difficulty. From the poisoned aquifer to the unexploded ordnances that litter the grounds, the U.S. military has proven time and again that they do not respect our most precious resources. The women of Affirm are daughters and granddaughters of picture brides and comfort women. As transnational women, we know that the sexual exploitation of our foremothers comes as a result of military occupation, war, and conquest. I am a second generation Filipina immigrant. My family is from Pampanga, Angeles City, which is closest to Clark Air Base as a major American military base in the Philippines. I grew up hearing stories riddled with the horrors enacted upon the women and girls in my province. And it's well documented that military presence in a region guarantees an increased demand for commercial sex, which places women and girls in the community at risk of sexual exploitation. As a resident of the illegally occupied Kingdom of Hawaii, I can't help but draw parallels between these military occupations and the devastation that they wreak upon women, girls, and our gender expansive family, the generational trauma that the body can and will remember. We say no to retention because we know that the violence enacted upon land and water will always</p>	<p>Please see General Response.</p>

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		<p>come back to burn the women, girls, and mahu community. I'm almost done. We say no more, no more war, land back, bodies back, no to retention, protect our waters, protect our daughters, invest in taking care of the people through food sovereignty, fully resourced schools, accessible healthcare, and housing. Community care will bring safety and military -- community care will bring safety, not military conquest and war mongering. The land remembers its people, and the U.S. Military is not and will never be for this land. We demand, in conclusion, end the army's occupation of any of the state lands at Kahuku. Clean up, restore the land, and immediately return it to the stewardship of Kanaka Maoli, the rightful stewards. Mahalo.</p>	
Alexandra Balgos	AF3IRM Hawai'i	<p>AF3IRM Hawai'i strongly opposes the Army's retention of any of the "State" lands at Kahuku. 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.</p> <p>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> <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,</p>	Please see General Response.

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		<p>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.</p> <p>The extent of the environmental impacts of Kahuku 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 6,322 acres of land that are up for renewal. What is more important is 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.</p> <p>We demand that the U.S. military implement an immediate ceasefire on all conservation lands in KTA. 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> <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.</p> <p>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.</p> <p>In conclusion, end the Army's occupation of any of the "State" lands at Kahuku, clean up and restore the lands, and immediately return the land to Kānaka Maoli, its rightful stewards.</p>	

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Nicholas Ball	Americans For De-Occupation	<p>Aloha nui loa U.S. Army Pacific Command, Please forward this testimony directly to the President of The United States, as they have a Sole Executive Agreement, a treaty, which under Article 6 of The United States Constitution, must be enforced, as the agreement was binding to all successor presidents since President Grover Cleveland and Queen Liliuokalani made the executive treaty and trust.</p> <p>We owe the Hawaiian Kingdom respect, dignity and a treaty of peace. It is long overdue and our credibility is and has been on the line which is a threat to United States national security.</p> <p>We must defend and protect our oaths and the constitution our forebears prescribed. We must also defend Treaty Law, The Law of Nations, and Prescribed International Humanitarian Law.</p> <p>Treaties are the supreme law of the land in the United States, and we are out of our jurisdiction in the Hawaiian Kingdom.</p> <p>Our presence in the Hawaiian Kingdom is unnecessary, unconstitutional and unwise.</p> <p>Our presence in the Hawaiian Kingdom is more of a threat to The United States of America's national security And the Hawaiian Kingdoms Security. Our service members are in the unnecessary line of sight of nuclear strikes along with the entire population of the Hawaiian Kingdom archipelago. The Hawaiian Kingdom is a neutral country and can serve as a great sanctuary for diplomacy and food security for all of humanity. We must give our best efforts to help them help themselves.</p> <p>We must rightfully enforce Army Field Manuals FM-27-10 and FM 27-5 in the Hawaiian Kingdom.</p> <p>We would be wise to bring our service members home to defend the United States continent (after we clean up our mess) like Smedley Butler recommended, and vow to defend the Hawaiian Kingdom from anybody doing what we did to them again, we owe it to them and it would be a testament to freedom around the world.</p> <p>We do not imitate for we are an example for others.</p> <p>With our technological edge on warfare and defending our interests, we should make it our interest to defend the Hawaiian</p>	Please see General Response.

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		<p>Kingdom from afar. The United States is more than capable of building its own archipelago within 300 miles of our shores to truly defend the source of freedom, the American people, and our allies. Heck, we could build archipelagos the size of Hawaii all around our shores.</p> <p>We must uphold the rule of law in the Pacific and around the world before humanity is doomed by miscalculation or madness. That is what America can do for the world. I can think of no better nation to truly defend freedom and our own ideals, which are currently in urgent need of defense.</p> <p>With great appreciation,                      Nicholas Daniel Ball                      Americans For De-Occupation</p>	
Nicholas Daniel Ball		<p>Aloha nui loa -- Aloha nui loa kakou. Pardon me. When in Rome, I got to act like the Romans. Mahalo. Okay. So I came here just because of the sole executive agreements made between President Grover Cleveland and Queen Liliuokalani. We got them right here. I don't know if the camera can see. But if you support the permanent de-occupation of the Hawaiian Kingdom, will you please stand and make some noise in this room? Mahalo. Mahalo. So I have good news. Because the most -- one of the most experienced warriors the United States military ever had, Smedley Darlington Butler -- this is him -- he wrote the book "War is a Racket." And he wrote a three-step process for totally smashing the war racket. We must take the profit out of war, step one. Two, we must permit the youth of the land who would bear arms to decide whether or not there should be a war. Three, we must limit our military forces to home defense purposes. I'm not only calling for an end to these leases, but I'm calling for an immediate ceasefire all over this archipelago, including Lihue including Makua, the whole nine yards, the whole enchilada. We need an immediate de-occupation, through the Pacific command, through a military commission. That is the proper process. And I'm just here to ask for that, sir. And if you guys could send that to the highest office in the land of the president of the United States, I would -- I would seriously</p>	Please see General Response.

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		<p>appreciate a complete de-occupation through a military court. And -- and the last thing, just some history. This is a picture of Abraham Lincoln and some of the Kamehameha dynasty. I don't know if you guys knew, but they're pen pals. These guys are writing letters to each other, 1861, around the time of Gettysburg. Right here, it says -- this is from Abraham Lincoln to King Kamehameha V. He wrote, "To a great and good friend of the Hawaiian Kingdom." And he addressed him as "Your Majesty." It's legit. We got to -- we got to fix this, you guys. Mahalo nui.</p>	
Nicholas Ball		<p>Hey, aloha, everybody. Nicholas Daniel Ball, son of Utah. Yeah. I'm a student of the Waiane moku. I'm a haumana, and I just wanted to come up here tonight to talk to you not as a Hawaiian, but as an American that does care about what's happening to his neighbors out here in the Pacific on the frontline. . . . Oh. And good evening, sir. Good evening all the -- everybody up here on the stage tonight. . . . So, first, I would like to open up with some very wise words. This is what hit me when I decided I wanted to speak out and do something about this as an American, was, "Oh, honest Americans as Christians, hear me for my downtrodden people. . . . "Their form of government is as dear to them as yours is precious to you. Quite warmly as you love your country, so they love theirs with all your goodly positions, covering a territory so immense that there yet remain parts unexplored, possessing islands that although near at hand had to be neutral ground in time of war. . . . "Do not covet the vineyard of Naboth's so far from your shores, lest the punishment of Ahab fall upon you, if not in your day, in that of your children, for 'be not deceived, God is not mocked.'" Queen Lili'uokalani, 3 -- 7/3/1898. You know bless her. And, you know, I come from the Ball ohana. There was a man on the other side of that message, Thomas H. Ball. We're not genealogically related I just found out, but our position is the same. He said, in that day in Congress, in 1898, when he -- I'm assuming he saw this, this appeal. He said, "Gentlemen, what you are attempting to do here in regards to the joint resolution is unlawful, unconstitutional, and unwise. It is a very deliberate attempt to do unlawfully that which</p>	Please see General Response.



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		<p>cannot be done lawfully." . . . . And, you know, as an American we -- I took an oath to be here. I -- I came out here by chance, not by choice, as a Marine Corps Infantryman just like the men that were sent here to do that act of war. And it makes me very angry not only as an American, but a Marine, that we were used for the wrong reason. . . . . We are not to instill tyranny. We are not to take over our neighbors. We are not to bully them. We are the -- supposed to be the first to right or fight for right and freedom. . . . .</p> <p>The most -- one of the most decorated military officers in the history of the United States of America was Smedley Darlington Butler. Sir, I wanted to appeal to you with this. He wrote the book War is a Racket. So we have the most decorated man in the uniform at the time, this is before World War II. He came out of the Bonus Army March, and he told all the veterans that were there, you know, just like how we have our native tenants that are suffering all over the Pacific, having high suicide rates, so are the veterans that have to carry this out for the few. . . . . You know the many pay for when the few want to do tyranny and bully our neighbors and it's usually our service members, the ones who shoulder the rifle. Let them vote. Let the ones who shoulder the rifle decide if they want to go take over their neighbors, and I vote they will say nay, as would I. . . . . But, you know, everybody I -- I want to mention, War is a Racket. It's a book. It's by Smedley Darlington Butler. Please check it out. He was -- that was before World War II, before the bombs dropped out here. Get the target off Hawaii, get the target off the Hawaiian Kingdom. Honestly. And --Oh, and now also for -- for you, sir, there is a man named Albert H. Silva. You know I mentioned I'm haumana. He was Hawaiian, you know, a huge man in the community from what I understand. And he said, you know, this is his words. Sorry if I butcher it. I'm pretty sure I can get right though. . . . . He said when the Waianae way and the Hawaiian way is when they come to you and ask you for help, they're giving you a chance. They're giving you a chance to prove you're good. . . . . And, you know, I received that same chance. And, sir, I know you're not going to make the decisions</p>	

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		<p>around all this. I know you're a messenger. And, you know, on behalf of my kupuna, on the behalf of my family, I weaved this lei for you. And just to show what I learned here in Rome from the Romans, I know you don't make the decisions and I felt the pain you're probably feeling hearing the pain these guys have. So mana kēia everybody 'oe pū.</p>	
Alec Bayer		<p>Leases of lands at Kahuku Training Area (KTA), Kawaioloa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O’ahu, should be not be renewed, swapped or continued in any way, shape of form. These areas contain habitat for critical endangered species, important native Hawaiian cultural and spiritual sites and much more. They are not for bombing, shelling or artillery practice and continuing to do so will negatively impact our fragile ecosystem. They must be handed over as conservation areas with a protected status and the military must do it's due dilligance to clean up the contamination and pollution. It's only pono.</p>	
Rosemary Bearden		<p>Aloha,                      As a kama'āina and a student studying Conservation Biology and Ecology of the Hawaiian Islands, I strongly oppose the Army Training Land Retention (ATLR) at Kahuku Training Area (KTA), Kawaioloa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O’ahu. The Army has illustrated again and again that it cannot be entrusted with the care of Hawaiian land. From the posoining of O'ahu's water to the bombing of PTA and Kaho'olawe and beyond, the US military, including the Army, has decimated and desecrated the 'āina and put the health of the land, people, native species, and natural resources into jeopardy. It is in the best interest of all of Hawai'i to deny the retention of this land by the US Army. Thus, I strongly oppose the Army Training Land Retention (ATLR) at Kahuku Training Area (KTA), Kawaioloa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O’ahu.</p>	Please see General Response.
Micah Benavitz		<p>Aloha. My name is Micah Benavitz, past president of the Wahiawa Community Business Association, and current board member. We</p>	Please see General Response.

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		<p>have represented the Wahiawa community and the businesses that are the neighbors of Schofield for almost 90 years. This community and the military have strong ties. For example, the Wahiawa swimming pool was the first swimming pool in Hawaii that was public, that the US Corps of Engineers assisted in building 75 years ago today. The World War II veterans funded the pool in appreciation for the support of the Wahiawa community when they served overseas. There are 21 names at the pool of those killed in action from Wahiawa -- majority graduated from this school -- who gave their lives, a sacrifice for freedom. About 30 percent of the students that attend this very school have parents in the military. When the 25th idea was deployed in the early 2000s, I remember Wahiawa turned into a ghost town, and many businesses struggled. During lunchtime, there are many military personnel in Wahiawa who patronize the small businesses. One of the fears is that the military downsize will greatly impact the local businesses in Wahiawa negatively, as well as our national defense efforts. The US military uses these training facilities to be combat-ready and ready for humanitarian crises such as natural disasters or man-made. The current geopolitical -- the current global geopolitics is also worrisome, with the aggression of authoritarian regimes such as Russia invading Ukraine, Iran using proxies in the Middle East, North Korea escalating by providing weapons to Russia and increasing their nuclear capabilities. Our country is facing dire challenges, further complicating in this quandary faces by communities in the Indo-Pacific, with the expansion of the PRC to the Spratly Islands, encroaching upon Vietnam and the Philippines and other parts of the Pacific, including its rattle-sabering over the Straits of Taiwan. In addition, the PRC is extending its tentacles in the South Pacific, with Tonga deeply in debt with the PRC, and forging closer relations with the Solomon Islands. Last year, the Solomon Islands blocked port visits to US Naval ships. There are parallels with the current events of aggression, authoritarian regimes, to the 1930s, of fascism which led to World War II. Democracies today are being threatened both in Europe and in Indo-Pacific. The war in Ukraine is escalating, with</p>	

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		<p>transnational soldiers fighting on both sides.· Currently, the PRC is training in Belarus with the Russian military. Last year, the South African military participated in a 10-day joint day military exercise with Russia and the PRC along the South African East Coast. To conclude, the WCBA supports the US military having areas to continue their training to prepare against threats from abroad, and appreciates its prompt response to community concerns.· It's been many decades since military vehicles have traveled through our streets to East Range. The footprint has been replaced by helicopters. Any negative testimony you hear tonight is not from the vast majority of the Wahiawa community, nor is it of the vast majority of the Hawaii citizens. Mahalo.</p>	
<p>Karolle Bidgood</p>		<p>The United States Army , There are a number of reasons not to enter into a new lease agreement with the Army. Foremost for me are the contamination of the lands and the seeming disrespect of cultural practices and values. This renegotiation is not simply a real estate deal which implies that both parties have an equal bargaining position.. I oppose renewal of any longterm lease agreements with the Army. Sincerely, Karolle Bidgood</p>	<p>Please see General Response.</p>
<p>Shelby "Pikachu" Billionaire</p>		<p>I got a great left angle.· I got a great right angle.· We're going to make sure a sound check right here.· I got to shift --All right.· So we got two minutes.· How long do I get? [Moderator: you have two minutes] All right.· Just the worse (inaudible), let's go.· All right.· Aloha.· My name is Pikachu Shelby Billionaire.· I'm actually an Air Force veteran.· I used to work at J6 Paycom, so we used to do bitcoin and crypto before that that stuff even existed, so we know exactly how much Paycom is important.· Now, it's IndoPacific Command. . . . . Obama took over.· Joe Biden has dementia, so I'm going to make sure to send this to your boss and POTUS because, obviously, he has to approve the budget and I would like you guys to pay proper lease rent.· Obviously, a dollar is a joke.· That's just a contract you guys did to make the lease seem like it's valid, but it's fraud. . . . . And, you know, the State of Hawaii was made in 1959, the State of Israel is 1948.· We can look at everything at Hawaiiankingdom.org.· And luckily, if you forget everything, I</p>	<p>Please see General Response.</p>

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		<p>already put in the comments, so you can write it down, Hawaiiiankingdom.org. . . . . Because as veterans we're supposed to protect the U.S. Constitution from threats foreign and domestic. We have domestic threats, Colonel, and we have the people we call the Illuminati, the Rothschilds, the Bilderbergs, the Warburgs, Astor. It's all on the CIA website of peoples actually controlling the money, selling the bullets to you guys, all those expensive ships we used to use to supply the war. . . . . Now, we have -- we know you go to war with Korea, North Korea, China. They want to hit Taiwan and everything's going to the world shit, because they're going to split the U.S. forces on Israel, Ukraine, and we know Joe Biden helped to overthrow that with the coup, which is the CIA, again, they're called the Jackals that go to overthrow the government. If they don't take the bribe. They used four RICE from the CIA. You can contact them. . . . . R-I-C-E. Rewards, Incentives, Coercion, and Ego. That's how they overturn these governments. Cuba, you already seen the Gary Webb's movie, Kill the Messenger, where he discovered the CIA was smuggling the drugs, the coke and everything, through CONTRA through these wars. . . . . So I don't want us to get stuck in stupid wars where they're going to send us veterans back out to war, and we survive, we don't have PTSD, we have current traumatic stress disorder. It's still going on because they lied to me. They lied to Keanu Sai when he was the Army Battalion Officer. He wrote all this stuff. It's on YouTube. It's on everything. So I'd like you guys to figure something out. Definitely pay reparations and I actually adopted a highway on Mauna Kea. So you see the Hawaii Cyber Lions club because we have liability insurance, so I'd love to see the Army actually help me pick up the trash that's there on there. And we also have a lot of pickup and cleanups we can do on the beach. I believe I contacted your officers in the Nanakuli and Waianae board to do something 90 days out, maybe third week of September. We're going to coordinate with the Waianae/Nanakuli board to do something as a joint force, so you guys can get some brownie points. But we'd love</p>	

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		to see you actually do some real physical work and not wala au. Thank you very much.	
PIKACHU SHELBY BILLIONAIRE	ROYAL HAWAIIAN KINGDOM	1) PAY PROPER LEASE RENT per/ Sq. Ft. back to the people of the HAWAIIAN ISLANDS 2) Tell your Commander In Chief (POTUS) that it’s cheaper to pay the Local Residents & People of the Hawaiian Islands H.I. than to lose the lands & lose the WAR! #WETHEPEOPLE www.HAWAIIANKINGDOM.ORG DR. KEANU SAI (KEANU REEVES REAL HAWAIIAN BLOOD COUSIN) The answers you are looking for are found www.HAWAIIANKINGDOM.ORG & U.S. CONSTITUTION ARTICLE 6, CLAUSE	Please see General Response.
Eric Blanco		My -- my name is Sidney Blanco. I -- I would like to say the military has -- has destroyed our ecosystem. And I'd also like to say please leave in 2029. Mahalo.	Please see General Response.
richard bodien		End the US Military's Lease on O’ahu.	Please see General Response.
Routh Bolomet	Heirs of Kamehameha III	State of Hawaii Constitution Article XVIII, Section 5 confirms "continuity of laws" such as Hawaiian Kingdom 1840 Constitution under the "Exposition of the Principals on which the Present Dynasty is Founded"; Pararaph 3: The Kingdom is permanently confirmed to Kamehameha III and His Heirs, and His Heirs shall be persons who He and the chiefs shall appoint, during His lifetime, ....." Kamehameha III named four Heirs in His 1853 Last Will & Testament--accepted by the Hwn Kingdom Probate Court. Today two of the four named heirs have living Descendants. It is the Living Descendants who make the Diplomatic Protest, objecting to the leasing of the Private lands of Kamehameha III protected under the Geneva IV Convention. The heirs have not appointed the State of Hawaii our Representative or Land Commissioners to lease any Portion of Land in the Kamehameha II Private Land Inventory. Furthermore it is a false statement to say the State of Hawaii owns or received these lands lawfully in 1959 under US PUBLIC Law 86-3. On 3 January 1865 the Hawaiian Kingdom enacted the 1864 Chapter XXXIV Act that made all of Kamehameha III's land inalienable w/a maximum 30 year lease at market rates. So it is an impossibility for the Republic of Hawaii in 1898 to give the Crown	Please see General Response.

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		lands to the U.S. & for the U.S. to give the same to the State of Hawaii in 1959 under U.S. Public Law 86-3. [Attached Exhibit A-00001].	
Routh Bolomet		<p>Oh, sorry. Aloha kakou. My name is Routh Bolomet, and I began to learn about the crown lands in 2010 when I applied to OHA for the Kuleana land tax. They denied me. Why did they deny me? They said because the land that we purchased in cash in Pupukeya, Ahupua'a, Ko'olauloa on the island of Oahu were private lands of King Kamehameha III that was made inalienable on 3 January 1865. And according to the State of Hawaii constitution, Article 18, Section 9, the lands -- I mean, the laws are confirmed. Now, if it's confirmed enough to keep me from getting a Kuleana land tax, reducing my land tax to \$300 a year, why is it that you are saying that this belongs to the State of Hawaii? They confirmed that on June 7, 1848, the Hawaiian Kingdom confirmed the inventory of Kamehameha III that was guaranteed to himself and to his heirs and successors forever. In the Article 16 and 17 of the 1852 and the 1864 Hawaiian Kingdom constitution, it says there shall be no laws that are retroactive. So if there's no laws that are retroactive, if the State of Hawaii's own constitution says that we do not -- or they do not or they do uphold the laws that came before, how is it that these private lands went into a private trust that belongs to the public? Public lands are not private lands. Now, Article -- the Geneva 4 Convention said that private lands are confirmed to the people. Article 8 of the Geneva Convention says that nobody that's qualified as international protected persons may be coerced or volunteer away any of their protections or their rights, which includes private lands. So I am here as a direct heir of Kamehameha III. Now, I know a lot of people are saying they're heirs, but what determines the direct heir? Well, that's in the 1840 Hawaiian Kingdom constitution under the exposition of principles of what created and founded the dynasty. In paragraph 3, it says that Kamehameha III will choose his heirs in his lifetime. He did that in his probate. That probate had four people. Only two of the people have direct living descendants. And my family comes from one of</p>	Please see General Response.

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		<p>those descendants. That's Queen Kalama. The other one is princess -- Crown Princess Kamamalu. Now, if you're negotiating for lands or leases, you're going to be doing that with the actual owners, not with the State of Hawaii, not with the United States. The United States had no authority. Now, this is important, because you guys are making contracts with the wrong people, and you're upholding it. And you hold all the laws against us that you want to use against us, but you're not upholding your own laws. In Army Field Manual 2710, it is the codification of the Geneva 4 Convention that gives all of us that are qualified international protected persons, Hawaiian nationals. That doesn't mean just kanaka. It was who were Hawaiian nationals at the time before January 17, 1863. Now, all the people that are Hawaiian nationals, we have international protected person status that you are refusing to uphold. Uncle Liko told you what Dr. Alfred de Zayas wrote. He wrote that for my case -- for my case -- I went all the way to Geneva, to the UN, to speak to the United Nations. And I said why are they allowed, the United States, allowed to do this? Well, they're allowed to do it because they pay the bills for the UN. Boris Johnson just last month went on YouTube -- and all of you should look this up -- and he was telling everybody: You got to have the United States keep paying for the bombs and all the equipment going to Ukraine, because we must uphold the hegemony. That is white power over the rest of the world. It's shrinking. It is shrinking. You are the minorities. We are the voices of the people, and you're harming us. Each one of you took an oath to uphold the U.S. Constitution, and Article 1, Section 10, Clause 1, that is the contract clause. That contract clause upholds all of our allodial titles, all of our private lands that you also took an oath to uphold. Article 6, that treaties are the supreme law of the land. 1849 treaty still is in force. And that treaty, Article 1 says that it was made between his Majesty the King of the Hawaiian Islands, his heirs, and his successors. I am an heir. You want to negotiate with me, we can start talking. But it's not going to show up the way you think it's showing up. Because we as the heirs, those are our private lands. And in 1865, on the 3 January, there</p>	



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		<p>was a law that was passed that made all of Kamehameha III's private lands inalienable, with only a maximum 30 year lease. And it wasn't for a dollar a year, you know, or for any time. So, you know, you ask us to follow your laws. Within Dr. de Zayas's memorandums, both to the UN, to the UN members, they're all saying that we are entitled to protections. Our lands are protected. You are supposed to be upholding your treaties. The United States in 1950 signed the Geneva 4 Convention that protects all of our private, allodial title lands. So I'm asking you to follow the law. And I am personally, and everybody here, we're accepting your oath to uphold the U.S. Constitution. That is now a contract. And if you fail to do that, you are doing it in your personal capacity, and you can be held liable for breaking your own constitutional laws. Thank you.</p>	
Routh Bolomet		<p>Aloha mai kakou, everybody. My name is Routh Bolomet, and I'm here to speak about the negative and the false propaganda that the US military and the US federal government keeps feeding us. And a lot of us have bought into it, because when we say that the crown lands are the state lands, state-owned lands, I know that we've been fooled on levels. So what I want to do is take my time to read a memorandum that Alfred de Zayas wrote to the United Nations secretary Antonio Guterres and the member states of the United Nations. He started out by reminding the United Nations states that "The lawful political status of the Hawaiian islands is that of a sovereign nation state in continuity, but a nation state that is under a strange form of occupation by the United States, resulting from an illegal military occupation and a fraudulent annexation. As such, the international laws, the Hague and Geneva Conventions require that governance in legal matters within the occupied territory of the Hawaiian islands be administered by the application of law of the occupied state, in this case, the Hawaiian Kingdom laws; not the domestic laws of the occupier, the United States." On December 12th, 1959, the United Nations passed a general -- a general assembly resolution called "1469." It was based on the boundary descriptions that was provided by the US and US Public Law 86-3,</p>	Please see General Response.

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		<p>that excluded all of the Hawaiian islands. So none of the Hawaiian islands are included in this. So, in there, following that -- I mean using that, it gave the United States carte blanche to fool the world into believing that this was their territory. And through it, there were -- there's numerous human rights violations that stem from the wrongful occupation of the Hawaiian islands. Amongst the most egregious of abuse is being aided and abetted by the UN GA Resolution 1469, is the wrongful seizure of private lands from heirs and descendants who hold original alodial titles. That's absolute titles in perpetuity, issued by the sovereign King Kamehameha III [THE MODERATOR: I'm sorry. Can you please wrap it up?] under the laws of the Hawaiian Kingdom. The private lands in an occupied territory are protected in the Fourth Geneva Convention under Article 42 of the 1907 -- and the 1907 Hague Regulation, that states, "A territory is considered occupied when it is actually placed under the authority of a hostile Army. The occupation extends only to the territory which such authority has been established and can be exercised. According to the common Article 2 of the Fourth Geneva Convention, 1949 applies to any territory occupied during the international hostilities. They also apply in situations where the occupation of state territories meet with no armed resistance. "While the entry into -- into force of the Hague and Geneva Conventions are subsequent to the overthrow of the Hawaiian Kingdom by the United States in 1893, the hostile actions perpetrated by the occupier since 1893 entail continuing violations of fundamental rules of international law and human rights. Every occupation of -- of territory is subject to the UN charter and is regulated by international law. Once the situation exists which factually amounts to an occupation, the laws of occupation should be applied." [THE MODERATOR: I need you to please summarize the rest] "Whether or not the occupation is considered lawful, whatever its aim or its" [THE MODERATOR: Excuse me, ma'am.] Excuse me, please. [THE MODERATOR: I do] You don't [THE MODERATOR: We have it in writing. Yeah. We have a number of people who still have to go, though. So please summarize.] I'm --</p>	

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		<p>I'm nearly to the end. "Whatever the aim is, or whether it's called an invasion, liberation, administration or occupation, as the laws of occupation is primarily motivated by human rights and humanitarian considerations, it is solely the facts on the ground that determines its application. "The duties of the occupying power are spelled out in the 1907 Hague Regulations and the Fourth Geneva Convention, as well as certain provisions of additional Protocol 1 and customary international humanitarian laws.· The occupying power and the local authorities cannot deprive the population of the occupied territory of the protection afforded by international humanitarian law. "Under those laws, the -- the people --- the qualified people of Hawaii are international protected persons.· And under no circumstances can protected persons be deprived of their rights or coerced into renouncing their rights. "The main rules of -- of -- applicable is that the occupying power does not acquire sovereignty over the territory.· The occupying power must respect the laws in force in the occupied territory, unless they constitute a threat. "Three.· Reprisal against protected persons or their properties are prohibited, and for the confiscation of private properties by the occupier is prohibited.· A central provision of the convention is the principle of odhu teri odetari. That party to the treaties must prosecute a person who commits an offense against an international protected person, and, two, send that person to another state that requests his or her extradition for a prosecution of the same crime. "All members of the state of Hawaii --- judiciary, executive offices, and the US military personnel -- are required to take an oath to uphold the US Constitution, Article 6, paragraph 2, which establishes the federal laws made pursuant to it. And treaties such as the Geneva and Hague Conventions, duly ratified, constitutes the supreme law of the land."· And this is also the tenure of US Supreme Court judgment in the Paquete Habana case. Therefore, we are asking you to follow your laws, follow your treaties, that the US has been a signatory to.· We are not asking you to do anything but what you've already agreed to do.· And as the US military, it is your job to implement and make sure everything is</p>	

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		<p>-- is upheld. And if you don't uphold it, then you, in your personal capacities, can be held accountable. So I'm here to -- to give the diplomatic protests for the heirs of Kamehameha III. We do not consent. The -- the state of Hawaii does not have authority. We have not given them authority or appointed them our representatives. They are not our land commissioners. And under the 1864 law, Chapter 34, Section 3, it has made all of the crown lands inalienable. That means it couldn't be sold, and it could only be leased for a maximum of 30 years. Now, anything that happened in 1898 with the so-called "joint resolution annexation," in 1900 and in 1959, there could not be any transference of land lawfully. And that is also upheld in the case with Summa Corp against the California Land Commission, where the -- the Supreme Court ruled that unless the government was part of the original treaty -- or -- not treaty -- the original title at the time that the titles were given out, they are -- they have no say, and they cannot put any -- attach any authority. So currently, currently, I'm putting you on notice that you are trespassing upon the crown lands of Kamehameha III. They're the private lands, and all the people here also represent the kingdom lands. So you're also trespassing upon that. So thank you very much.</p>	
Alana Borsa		<p>Military land leases have done nothing good for the actual land or people. Training practices start fires constantly and pollute our limited water resources. Housing rental prices are always raised out of reach of the people already living here, forcing them to move to the mainland. Military housing allowances are raised to meet whatever the current cost is, tempting landlords to continue to raise prices to get more money. This creates an endless cycle. Please consider the impacts military practices have on the land and the people. Mahalo.</p>	Please see General Response.
Thomas Brandt		<p>So please stop pretending these problems are either exaggerated or no-existent. AT THE VERY LEAST--IF THE MILITARY IS ALLOWED TO STAY--THE MILITARY SHOULD PAY WHATEVER PRICE NATIVE HAWAIIANS DEMAND, BOTH IN CASH AND/OR IN KIND. THEN WE WILL FIND OUT HOW MUCH THE U.S. GOVERNMENT IS WILLING TO</p>	Section 3.2.5 has been revised to clarify the assumption that fair market value would be paid by the Army for any future land retention method.

Commenter	Submitted By	Comment	Response
		<p>PAY TO CONTINUE USING HAWAII TO KEEP THE WORLD SAFE FOR CAPITALISTS, INSTEAD OF PRETENDING IT IS "GOOD" FOR HAWAII TO BE AN UNWILLING CAPTIVE OF U.S. IMPERIALISM! Thomas Brandt</p>	
Emma Broderick		<p>I am in opposition to the renewal of leases from the state of Hawai'i to the U.S. Army.                      A history of environmental harm by the Army followed by a complete lack of clean up has negatively impacted the people, animals and organisms of Hawai'i nei. A renewal of leases will only continue the "significant adverse impacts" the Army admits will continue to come from their land use while these stolen lands were instead set aside through The Admissions Act to be held in a public trust for the betterment of the Hawaiian people. By not renewing these leases to the Army opportunities arise to house Hawaiian people, protect native species, mālama 'āina, access and care for culturally significant sites, and overall restore balance to what has been an extractive situation for far too long. I am hopeful that this opportunity to right past wrongs will be taken seriously and we will take an important step closer to justice for 'āina, kaiāulu, and all those with deep aloha for Hawai'i nei.</p>	Please see General Response.
Jocelyn Brody		<p>I want to speak strongly against the military being allowed to renew their contracts to continue using and abusing land in Hawaii. The military's current lease is immoral, to take so much land which is so valuable to the ecosystem here and not to compensate the Hawaiians who are then displaced as a result, this is unconscionable. The land that the army currently occupies could be better protected and stewarded by Hawaiians than it by the military, and their guidance would have positive environmental impacts for all the world as well as being the right thing to do since they deserve compensation for all the time their land was taken without their consent and giving it back is the first step in restoring justice.                      Therefore, as a citizen I believe that the military should not be allowed to renew their lease and that the land should be given to kanaka oiwī people and organizations to steward. It is the right</p>	Please see General Response.

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		<p>thing to do for justice, environmentally, and for all our futures. Thank you.</p>	
Shantee Brown		<p>Kahuku Training Area (KTA), Kawaioloa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) need to be remediated and returned to Hawaiians. I do not support the Army and other branches of the military continued use of these lands. The Army's presence in O'ahu is detrimental to Native Hawaiian rights to access and use their lands. Excessive Army personnel contributes to the housing crisis which pushes local people to leave O'ahu to the other islands or to completely leave Hawai'i. Contaminates from Army used lands are known to leach off site and many endangered species are threatened by current use.</p>	Please see General Response.
Chiemi Bryant		<p>Aloha mai kākou,                      I am submitting testimony in strong opposition to any EIS or plan that allows the U.S. Army to retain any portion of the 6,322 acres that are currently being leased in Kahuku, Makua, and Poamoho. I write in strong support of a plan that involves the Army returning all 6,322 acres of illegally occupied Hawaiian land.                      These lands were taken "without the consent of or compensation to the Native Hawaiian people of Hawaii or their sovereign government." Pub. L. 103-150, 107 Stat. 1510, 1512 (Nov. 23, 1993). Continued military occupation, degradation and desecration of Kingdom lands, including the "State-owned" lands at Makua, Kahuku, and Poamoho will inflict severe cultural and psychological harm on the Native Hawaiian people, who were unlawfully dispossessed of those lands.                      Decades of live-fire training have destroyed cultural sites and habitat for native species, contaminated the land and water, and limited access for cultural, subsistence, and recreational activities. The Army's failure to clean up after themselves has resulted in an unknown amount of unexploded ordnance littered throughout these islands.                      The draft EIS itself admits that Army activity on leased land will have "significant adverse impacts" on land use, environmental justice, cultural practices, and our freshwater resources.</p>	Please see General Response.

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		<p>The Kaho‘olawe bombings and, more recently, the Red Hill catastrophe has shown the people of Hawai‘i just how little the U.S. military cares about our ‘āina, wai, and po‘e. In light of this "legacy," how can the people of Hawai‘i support renewal of these leases? The U.S. Military has proven themselves again and again to be terrible stewards of our ‘āina and wai. The true stewards of these lands have waited generations - please listen to them and return all 6,322 acres.</p>	
Elena Bryant		<p>Aloha. My name is Elena Bryant. I'm an attorney at Earth Justice, and our office has been involved in environmental review processes and litigation related to the army's training areas across Hawaii Pae Aina, including Makua, for decades. And our office has raised serious concerns about the manner in which the army conducts activities in these culturally and environmentally sensitive lands. As a threshold matter, we kokua the community and emphasize the clear community position that the continued military occupation and use of Makua, Kahuku, and Poamoho training areas for military training is hewa and should cease immediately. Our office submitted comments during the scoping review period, raising numerous concerns that have still not been adequately addressed in the draft EIS. I won't detail them all tonight, but I will quickly note a handful of egregious oversights that have not been adequately addressed. <u>The EIS fails to address impacts associated with the U.S.'s involvement in the illegal overthrow of Hawaii.</u> The continued military occupation, degradation, and desecration of Kingdom lands, including state-owned lands, inflicts severe cultural and psychological harm on the Native Hawaiian people, who were unlawfully dispossessed of these lands. This has not been adequately addressed in the EIS. The no-action alternative must consider, but fails to consider, the substantial benefits that would come from terminating military occupation and use of state-owned lands. Decades of military occupation have destroyed habitat and the endangered and imperiled species that rely on that habitat. It's caused extensive erosion and sedimentation, noise, and contamination of our lands and waters. Ending leases would confer</p>	<p>Section 3.2.5 discusses the events of 1893 and the Apology Resolution in 1993.</p> <p>From 2019 through 2023, all requests that were made by the public for access to KTA, Pomoho, and MMR were granted regardless of affiliation.</p> <p>Section 3.12.5 discusses the connection of ‘āina to the Hawaiian people in reference to the CIA and the significant adverse impact that would occur through the loss of ‘āina regardless of the specific locations of practices. Benefits occurring as a result of returning lands to the State are identified as part of the No Action Alternative analysis in Section 3.12.5; what the State specifically chooses to do with these lands is speculative and not part of this analysis. Text has been added to Section 3.12 Environmental Justice to further assess significant impacts on Native Hawaiians.</p> <p>The Army acknowledges the comments received on the Draft EIS regarding the challenges with obtaining a new lease. The Army understands that the execution of a new lease prior to the expiration of the current lease is arduous because the processes for a rule amendment and for lease execution are contestable and could remain</p>

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		<p>substantial benefits by preventing further degradation and would trigger the army's kuleana to clean up these lands. <u>The army's lease has largely put public trust lands off limits to the beneficial use by Native Hawaiian community and the general public for generations and severely limits access to cultural, subsistence, and recreational purposes. And often, the army suddenly and unilaterally shuts down public access altogether. The analysis of alternatives and mitigation measures in the draft EIS, or lack thereof, are insufficient to minimize -- minimize impacts of continued military occupation and use of these lands that the army seeks to retain. Lastly, I'll note we're also greatly concerned with the army's proposed land retention methods, all of which are incompatible with existing law and the state's obligation as trustee of our public lands and public trust resources. When the army's lease expires in 2029, the current military training activities are prohibited unless one of the army's proposed land retention methods are approved. The first method, a new lease, requires that the conservation district rules be amended to specifically allow for military training. These are the laws that are meant to protect important natural resources that are essential to the preservation of our natural ecosystems and the sustainability of our water supply. To amend these laws specifically to allow for the destruction, degradation, and contamination of public trust resources contradicts the express purpose of state conservation rules. It'd be a gross violation of the state's public trust duties and it would set a dangerous precedent of amending rules to legalize prohibited uses. The second method would be a land exchange, and to the extent that the army has any surplus lands available for a potential land exchange, under public law 88-233, the U.S. government is already required to convert any surplus lands in its possession to the state without monetary compensation -- or consideration, making any potential surplus lands unavailable for a proposed land exchange. The third method is a purchase. And the alienation of any public trust lands for a real estate transaction would result in the permanent loss of land. This is inconsistent with</u></p>	<p>unresolved well past 2029, when the current leases expire. Several commenters have stated that continued military use of lands within the conservation district are contrary to the purposes and policies of the Conservation District. Commenters have also stated that continued military use of the State-owned lands, which are public trust lands, would be inconsistent with the State’s public trust purposes. Although a rule amendment to obtain a special subzone would be difficult and the execution of a new lease would be onerous, the EIS analyzes the impacts of a lease as a potential method of retention because a lease is one of the authorized methods for Army retention of State-owned land and because it would meet the purpose and need for the Proposed Action. Text has been added to Section 2.4 of the Final EIS accordingly.</p>



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		<p><u>the state's public trust duty to preserve trust property for the use and benefit of Native Hawaiians and the general public.</u> So in sum, the army's proposed land retention action has potential for lasting impacts on present and future generations and necessitates full and meaningful analysis of impacts, alternatives, and mitigation measures, which is grossly inadequate in the current draft EIS. Thank you.</p>	
Elena Bryant	EarthJustice	<p>Earthjustice submits these comments on behalf of Mālama Mākua in response to the U.S. Army’s solicitation for public comment on the Draft Environmental Impact Statement for Army Training Land Retention of State-Owned Lands at Kahuku Training Area (“KTA”), Kawaiiloa-Poamoho Training Area (“Poamoho”), and Makua Military Reservation (“MMR”) on O’ahu (“DEIS”), for which current leases expire on August 16, 2029. See 89 Fed. Reg. 48,600 (June 7, 2024); Army Training Land Retention on O’ahu—Draft EIS (June 2024), available at <a href="https://files.hawaii.gov/dbedt/erp/The_Environmental_Notice/2024-06-08-TEN.pdf">https://files.hawaii.gov/dbedt/erp/The_Environmental_Notice/2024-06-08-TEN.pdf</a>. The Army has prepared this DEIS pursuant to the National Environmental Policy Act (“NEPA”) to inform the Army’s own decisions regarding whether to continue occupying and training on State-owned lands and also pursuant to the Hawai’i Environmental Policy Act (“HEPA”) to inform the State of Hawai’i Board of Land and Natural Resources’ (“BLNR’s”) decisions regarding the public trust resources under its care. See DEIS at 1-26. Please note that, while Mālama Mākua’s mission focuses on safeguarding the sacred lands at Mākua, Kahanahāiki and Ko’iahi that lie within MMR, these comments apply equally to the DEIS’s analysis of the Army’s proposal to retain training lands at KTA and Poamoho. As a threshold matter, we emphasize that Mālama Mākua considers continued military occupation and use of MMR, KTA and Poamoho for military training to be hewa, which should cease immediately. Accordingly, Mālama Mākua strongly supports the “no action” alternative, under which “the Army would not retain any of the State-owned lands at KTA (Tracts A-1 and A-3), Poamoho (Poamoho Tract and Proposed NAR Tract), or MMR</p>	Please see General Response.

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		<p>(Makai, North Ridge, Center and South Ridge Tracts) after expiration of the 1964 lease.” DEIS at 2-42. While Mālama Mākua opposes any continued military occupation or use of MMR, KTA and Poamoho, it understands that the purpose of the EIS process “is to require disclosure of relevant environmental considerations that were given a ‘hard look’ by the agency, and thereby to permit informed public comment on proposed action and any choices or alternatives that might be pursued with less environmental harm.” <i>Lands Council v. Powell</i>, 395 F.3d 1019, 1027 (9th Cir. 2005); see also <i>Haw. Rev. Stat. §§ 343-1, 343-2</i>. Mālama Mākua offers its comments to assist the Army and BLNR in complying with their duties under NEPA and HEPA</p>	
Elena Bryant	EarthJustice	<p>A. The DEIS’s proposed land retention methods are not consistent with the State’s public trust duties or existing law. The DEIS acknowledges that “military use of the land in the conservation district ... is not an allowable use under HAR Chapter 13-5” and is also “not permissible under HRS Chapter 205-4.5” “in the agricultural district.” DEIS at 3-21; see also <i>id.</i> at 3-28, 3-37. To evade those state laws, the DEIS contemplates multiple methods for attaining a land interest that would allow the continued use of State-owned lands for military training activities, including (1) acquiring fee simple title to the State-owned lands for “fair market value,” (2) a potential land exchange, and (3) through the negotiation of a new lease agreement, which would require an amendment to the state conservation district rules. See DEIS at ES-12, 2-47, 3-13, 4-1. None of the land retention methods proposed in the DEIS is compatible with the State’s obligation as trustee of the public lands trust or existing law, and, therefore, they are not reasonable land retention alternatives. Moreover, all the State-owned lands being addressed under the proposed action have been identified as ceded lands. DEIS at 3-13. Given that “[t]he State’s duty of care is especially heightened in the context of ceded land held in trust for the benefit of Native Hawaiians and the general public under article XII, section 4 [of the Hawai‘i State Constitution],” <i>Ching v. Case</i>, 145 Hawai‘i 148, 177 n.49, 449 P.3d</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> <p>The Proposed Action is for the amount of land the Army seeks to retain, and does not make a decision for the land retention duration or method, whether it be for a new long-term lease, fee simple title, or land exchange, because that negotiation process would occur with the State following completion of the EIS. Details including timing for the rule amendment and land valuation is outside the scope of this EIS.</p>

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		1146, 1175 n.49 (2019), BLNR, as the approving agency for the purposes of HEPA, should not accept any of the methods proposed in the DEIS as a viable land retention option.	
Elena Bryant	EarthJustice	<p><u>Fair Market Value of the State-owned lands.</u> The DEIS claims that there will be “new,” “long-term,” and “beneficial impacts” on land tenure resulting from a sale of the State-owned lands, 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. DEIS at 3-22, 3-29, 3-37. The DEIS, however, is silent as to how “fair market value” would be determined. This deprives the public, including members of the public with expertise on the issue of determining fair market value, of the opportunity to comment on whether the Army’s proposed methodology to determine fair market value is proper. This violates NEPA and HEPA’s public engagement requirements. See 40 C.F.R. § 1501.9 (“The purpose of public engagement is to inform the public of an agency’s proposed action, allow for meaningful engagement during the NEPA process, and ensure decision makers are informed by the views of the public”). 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 that considers these and other considerations, the BLNR cannot make informed decisions regarding the public trust resources under its care. Moreover, absent disclosure of how fair market value will be determined, the DEIS’s claims that a new lease or sale would provide beneficial impacts is unsupported and purely speculative. To permit informed public review and comment on the Fair Market Value alternative and also to allow for informed decision-making, as NEPA and HEPA require, the Army was obliged, but failed, to disclose fully in the</p>	<p>In an instance where a lease is the land retention method for the State-owned lands at O’ahu, the Army has stated that they would, in coordination with the State, provide a fair-market value for the leased State-owned lands. Determination of fair market value is outside the scope of this EIS. The Final EIS has been revised in Sections 2.4, 3.1.3.1, and Appendix H to add the assumption that a new lease or fee simple title would be negotiated at no less than an equitable, fair market value with the State. Land retention negotiations, including compensation for use of the State-owned lands, would be initiated following completion of the NEPA/HEPA process.</p> <p>The Proposed Action is for the amount of land the Army seeks to retain, and does not make a decision for the land retention duration or method, whether it be for a new long-term lease, fee simple title, or land exchange, because that negotiation process would occur with the State following completion of the EIS. Details including timing for the rule amendment and land valuation is outside the scope of this EIS.</p>

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Elena Bryant	EarthJustice	<p>DEIS the considerations for determining “fair market value” for any fee simple land transaction of the State-owned public trust lands.</p> <p>Proposed Land Exchange. The DEIS 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 for military uses. DEIS at 2-47, 4-1. All the State-owned lands being addressed under the proposed action are ceded lands. DEIS at 3-13. 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.” Ching v. Case, 145 Hawai’i 148, 170, 449 P.3d 1146, 1168 (2019) (cleaned up). The alienation of any public trust lands through a land 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>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 ROD is published. Environmental impacts from the Proposed Action (Army retention of State-owned lands at O’ahu) are analyzed under lease and fee simple title as discussed in Section 2.4. Fee simple title represents the highest ownership rights possible in real property. It may be accomplished through a land exchange, and may require additional, separate NEPA analysis.</p>
Elena Bryant	EarthJustice	<p>New Lease and Amendment of Conservation District Rules. The DEIS further proposes the negotiation of a new lease agreement as a method to retain State-owned lands for continued military training activities. Any new lease agreement would require an amendment of the State’s conservation district rules to allow military uses in the conservation district. The State-owned lands 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</p>	<p>Compliance with HAR Chapter 13-5, Conservation District, has been revised and is discussed in Sections 1.4.2 and 4.3.2. Sections 1.4.2, 3.2, and 4.3.2 have also been revised to state 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>

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		<p>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 DEIS 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. DEIS at 3-13. 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 and violates BLNR’s public trust duty to use reasonable care and skill to protect, preserve and manage public trust lands. Such an amendment would be grossly inappropriate and would set a dangerous precedent of amending conservation district rules to legalize nonconforming uses</p>	
Elena Bryant	EarthJustice	<p>Analysis of the “No Action” Alternative Must Consider the Substantial Benefits of Terminating Military Occupation and Use of State-Owned Lands. In analyzing the “no action” alternative, the Army must consider the substantial benefits that would come from freeing the State-owned lands at MMR, KTA and Poamoho—and the public-trust resources found there—from continued military occupation and from putting an end to further training-related degradation, contamination, and destruction. The mere fact that the Army holds leases for these lands has largely put them off-limits to beneficial use by the public for generations. The Army severely limits access for cultural, subsistence and recreational purposes and often suddenly (and unilaterally) shuts down public access altogether. See, e.g., DEIS at 3-247 (only portions of KTA open for recreation or hunting and such access is permitted only “on weekends and holiday” or seasonally); Complaint, <i>Mālama Mākua v. Carter</i>, Civ. No. 16-00597 (D. Haw. Nov. 7, 2016) (notwithstanding court-ordered settlement, Army unilaterally shut down cultural access at MMR). Allowing the leases to expire without renewal would reopen these lands to Hawai’i’s people, conferring</p>	<p>Section 3.12.5 discusses the connection of ‘āina to the Hawaiian people in reference to the CIA and the significant adverse impact that would occur through the loss of ‘āina regardless of the specific locations of practices. Benefits occurring as a result of returning lands to the State are identified as part of the No Action Alternative analysis in Section 3.12.5; what the State specifically chooses to do with these lands is speculative and not part of this analysis. Text has been added to Section 3.12 Environmental Justice to further assess significant impacts on Native Hawaiians. Sections 3.2 and 3.5 discuss continued access with respect to recreation and cultural resources, and Section 3.10 discusses watershed protection efforts.</p>

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		<p>substantial benefits from increased public access for cultural, subsistence and recreational purposes and allowing these lands to return to culturally appropriate uses, including but not limited to the traditional practices of aloha ‘āina and mālama ‘āina; the gathering of native plants and woods, including for ceremonial and medicinal purposes; hunting; kilo (observation); watershed protection; spiritual practices; and recreational activities. The DEIS, however, fails to fully capture the substantial benefits that terminating military occupation and use of State-owned land would have on cultural resources and practices because it confines the scope of its analysis to the boundaries of the State-owned parcels. See, e.g., DEIS at 3-125 (dismissing practices and beliefs raised in the cultural impact assessment because “[i]t is unclear from the survey results if any of these practices occur directly within the State-owned land”). This is contrary to deeply rooted traditional Native Hawaiian beliefs that kānaka (people) are genealogically tied to ‘āina (land) in a way that transcends western boundaries and ways of thinking. The Hawai‘i Supreme Court in Office of Hawaiian Affairs v. Housing and Community Development Corporation of Hawai‘i, acknowledged the cultural importance of land to Native Hawaiians: The health and well-being of the native Hawaiian people is intrinsically tied to their deep feelings and attachment to the land. ‘Āina, or land, is of crucial importance to the native Hawaiian people--to their culture, their religion, their economic self-sufficiency and their sense of personal and community well-being. ‘Āina is a living and vital part of the native Hawaiian cosmology, and is irreplaceable . . . it is the foundation of their cultural and spiritual identify as Hawaiians. The ‘āina is part of their ‘ohana, and they care for it as they do for other members of their families. For them, the land and the natural environment is alive, respected, treasured, praised, and even worshipped. 121 Hawai‘i 324, 333, 219 P.3d 1111, 1120 (2009) (cleaned up). This deep connection to ‘āina is the foundation of numerous cultural practices that transcend the geographical boundaries on a map. Not only is the focus on the specific geographical boundaries of the State-owned parcels of land</p>	

Commenter	Submitted By	Comment	Response
		<p>overly constricting, it also ignores indigenous knowledge of the host of practices that were traditionally exercised over the broad geographical area that would encompass the State-owned lands and that could be reestablished on State-owned lands returned to the State. See, e.g., DEIS at 3-125 (acknowledging that cultural impact assessment interviewees identified resources, practices, and beliefs, but disregarding input because “informants did not directly connect these resources to the specific geographical boundaries of the State-owned land[.]”); see also 40 C.F.R. § 1501.8(a) (affirming the use and benefit of indigenous knowledge as a source of relevant special expertise in the environmental review process). Here, the DEIS is deficient in its evaluation of the substantial benefits of terminating military occupation and use of State-owned lands on cultural resources and practices in its “no action” alternative. See 40 C.F.R. § 1502.14(b) (requiring that an agency “discuss each alternative considered in detail . . . so that reviewers may evaluate their comparative merits”)</p>	
Elena Bryant	EarthJustice	<p>C. Analysis of Alternatives Must Consider Measures to Minimize Impacts of Continued Military Occupation and Use of State-Owned Lands. The Army’s failure to disclose its proposed action (i.e., the land retention method and terms of the selected method) renders the DEIS legally deficient. The Army claims that it is only following “completion of this EIS” that a decision will be made regarding the land retention method, and what terms would be associated with the selected methods. [1 See DEIS at ES-6 (“the land retention estate would not be selected until after completion of this EIS”); ES-12 (“Negotiation is required with the State to determine what estate(s) and method(s) would be considered. This negotiation would follow issuance of the Army [Record of Decision]”); 1-15 (“The Record of Decision (ROD) for this EIS will decide on the amount and location of State land that the Army would seek to retain. It will not decide on the method of retention . . . That decision with [sic] be made following the ROD and negotiations with the State”); 1-19 (“Any request to create a new subzone, such as one that allows for military activities under a new lease, would</p>	<p>The Army acknowledges the comments received on the Draft EIS regarding the challenges with obtaining a new lease. The Army understands that the execution of a new lease prior to the expiration of the current lease is arduous because the processes for a rule amendment and for lease execution are contestable and could remain unresolved well past 2029, when the current leases expire. Several commenters have stated that continued military use of lands within the conservation district are contrary to the purposes and policies of the conservation district. Commenters have also stated that continued military use of the State-owned lands, which are public trust lands, would be inconsistent with the State’s public trust purposes. Although a rule amendment to obtain a Special Subzone would be difficult and the execution of a new lease would</p>

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		<p>occur after completion of the EIS process”); 1-20 (“If a new lease were to be executed, military activities on State-owned lands would follow State regulations as appropriate”).] The Army misstates the legally mandated procedures. Under federal law, the alternatives section is “the heart of the environmental impact statement.” 40 C.F.R. § 1502.14. Similarly, under Hawai’i law, the EIS must evaluate “reasonable alternatives that could attain the objectives of the action,” with “particular attention ... given to alternatives that might enhance environmental quality or avoid, reduce, or minimize some or all of the adverse environmental effects, costs, and risks of the action.” Haw. Admin. R. § 11-200.1-24(h). Alternatives should examine “different designs or details of the proposed action that would present different environmental impacts.” Id. § 11-200.1-24(h)(1). Federal law similarly requires the alternatives analysis in an EIS to “[i]nclude appropriate mitigation measures not already included in the proposed action or alternatives.” 40 C.F.R. § 1502.14(e). Accordingly, under both state and federal law, the EIS itself, not some analysis performed following completion of the NEPA/HEPA process, must evaluate alternatives that incorporate measures to minimize the impacts of continued military occupation and use of any portion of MMR, KTA or Poamoho (e.g., lease conditions) that the Army proposes to retain. By refusing to disclose its Proposed Action until after all opportunity for comment has passed,” the Army illegally “insulates its decision-making process from public scrutiny.” State of Cal. v. Block, 690 F.2d 753, 771 (9th Cir. 1982). In Citizens for Better Forestry v. U.S. Dep’t of Ag., the 9th Circuit held that the deprivation of the public’s “opportunity to comment on” a NEPA analysis “violated [the plaintiff’s] rights under the regulations implementing NEPA.” 341 F.3d 961, 970 (9th Cir. 2003). The inclusion in the final EIS of a representative sample of comments does not cure this deficiency, Block, 690 F.2d at 773, and deprives the public the opportunity to meaningfully engage in the environmental review process. See 40 C.F.R. § 1501.9(a) (mandating that “the purpose of public engagement is to inform the public of an agency’s proposed action, allow for meaningful engagement</p>	<p>be onerous, the EIS analyzes the impacts of a lease as a potential method of retention because a lease is one of the authorized methods for Army retention of State-owned land and because it would meet the purpose and need for the Proposed Action. Text has been added to Section 2.4 of the Final EIS accordingly.</p>



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		<p>during the NEPA process, and ensure decision makers are informed by the views of the public”). The DEIS’s failure to do so deprives the public of the opportunity to review, evaluate and comment on the comparative merits of the proposed alternatives. See id. § 1502.14(b) (requiring that an agency “discuss each alternative considered in detail . . . so that reviewers may evaluate their comparative merits”). Reasonable conditions for any continued military occupation/use of State-owned lands that the Army was obliged to consider and analyze in its DEIS include, but are not limited to: (1) a prohibition on any live-fire training; (2) provision for community observers to monitor military activities; (3) an ongoing obligation to clear all UXO; and (4) guarantees of adequate opportunities for cultural, subsistence and recreational access. These are discussed in greater detail below, and were also raised in Mālama Mākua’s scoping comments, which were submitted by letter dated August 31, 2021, and are part of the project administrative record. The DEIS failed to consider alternatives that incorporated any of these reasonable conditions, rendering the DEIS deficient and requiring the Army to prepare and circulate a revised DEIS for public review and comment. “NEPA’s public comment procedures are at the heart of the NEPA review process.” Block, 690 F.2d at 770. “This reflects the paramount Congressional desire to internalize opposing viewpoints into the decision-making process to ensure that an agency is cognizant of all the environmental trade-offs that are implicit in a decision.” Id. 690 F.2d at 771 (citations omitted). Moreover, “[t]he existence of reasonable but unexamined alternatives renders an EIS inadequate.” ʻĪlioʻulaokalani Coalition v. Rumsfeld, 464 F.3d 1083, 1095 (9th Cir. 2006). Here, the DEIS fails to respond, let alone provide any reasoned analysis in response to any of the proposed conditions and mitigation measures provided in Mālama Mākua’s scoping comments. The failures require the Army to prepare and circulate a revised DEIS for public review and comment. See 40 C.F.R. § 1502.9(b) (“If a draft statement is so inadequate as to</p>	

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Elena Bryant	EarthJustice	<p>preclude meaningful analysis, the agency shall prepare and publish a supplemental draft of the appropriate portion”)</p> <p>1. Prohibition on Live-Fire Training The DEIS acknowledges that adverse impacts on historic and cultural resources associated with past military activities within State-owned land “are largely associated with physical impacts from live-fire training.” See DEIS at 3-111. None of the State-owned land at any of the three training areas is currently used for live-fire training, and the Army has long been able to carry out its national security mission without live-fire training at MMR, KTA or Poamoho. See DEIS at 3-144 (KTA); 3-147 (Poamoho); 3-154 (MMR). In fact, the Army has not Mālama Mākua Comments re: ATR DEIS August 7, 2024 Page 8 fired a single shot at MMR since June 2004, more than 20 years ago, and it has never conducted live-fire training at Poamoho. See DEIS at 3-147, -154. While the DEIS makes clear the Army’s determination that “it will not pursue live-fire training at MMR,” DEIS at 3-34, going forward, the prohibition on live-fire training on State-owned lands should be extended to prohibit the firing of any weapons either on leased State lands or from leased State lands into federally held training areas, which would confer protection (and, thus, significant benefit) to public trust resources on land that is currently under federal ownership. Notably, the Army’s stated purpose is to retain the use of these training lands “to allow the military to continue ongoing training and to meet combat readiness requirements” and “does not propose any changes in uses currently at the project sites.” DEIS at ES-5, 4-15 (emphasis added). As discussed, current training does not include any live-fire training at any of these facilities, and the DEIS acknowledges that land retention is important for “non-live-fire training.” DEIS at ES-5 (emphasis added). The DEIS fails, however, to evaluate as part of any alternative imposing a condition that would expressly prohibit live-fire training. The failure to evaluate an alternative that would prohibit live-fire training renders the DEIS deficient and requires the Army to prepare the circulate a revised DEIS for public review and comment. 2. Community Observers to Monitor Military Activities To minimize the impacts</p>	<p>With the Army's announcement that it will no longer pursue live-fire training at MMR as identified in the Draft EIS, there was no need to further consider those alternatives.</p> <p>While outside the scope of the EIS, the Army acknowledges observer requests and will comply with court orders regarding the use of observers.</p>

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		<p>associated with military use of State-owned land, adequate monitoring of the Army’s compliance with lease terms is vital. In <i>Ching v. Case</i>, 145 Hawai’i 148, 449 P.3d 1146 (2019), the Hawai’i Supreme Court held that the BLNR had breached its trust duties to monitor the Army’s compliance with the terms of its lease for State-owned land located within Pōhakuloa Training Area on Hawai’i Island. To help ensure adequate monitoring of the Army’s compliance with the conditions and limitations included in any new lease or other agreement for continued military occupation and use of State-owned lands at MMR, KTA or Poamoho, the EIS should examine alternatives that provide for community observers to monitor all military activities that take place on, or otherwise affect, leased lands. The court-ordered settlement currently in effect for MMR confirms the reasonableness, feasibility and importance of imposing a community observer requirement. That agreement provides that “[a]t least one member of Mālama Mākua will be allowed access as an observer to each live-fire training exercise at MMR, post-training UXO cleanup, and post-training evaluation of damage to cultural sites.” Settlement Agreement and Stipulated Order, <i>Mālama Mākua v. Rumsfeld</i>, Civ. No. 00-00813 SOM LEK, at ¶ 12 (D. Haw. Oct. 4, 2001) (“2001 Settlement”). The settlement further provides for “[o]ther members of the Wai’anae Coast community” to serve as observers. <i>Id.</i> In consultation with Mālama Mākua, the Army established detailed protocols for monitoring by community observers. See <i>Access by Members of Mālama Mākua and/or Members of the Wai’anae Coast to Observe Training at Mākua Military Reservation</i> (Nov. 2, 2001). During the limited period (from October 2001 to June 2004) when live-fire training occurred at MMR, Mālama Mākua and Wai’anae Coast community observers witnessed, flagged and prevented numerous violations by the Army of limitations on live-fire training imposed by the U.S. Fish and Wildlife Service to ensure compliance with the Endangered Species Act (e.g., unit commanders attempting to continue training exercises when the burn index was too high and mortar rounds fired outside the firebreak roads). Conditioning any lease renewal</p>	

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		<p>on the Army allowing community observers would likewise help ensure compliance with lease terms that seek to prevent harm to the human environment. Apart from a vague reference that the Army would consider developing a mitigation plan with monitoring requirements, DEIS at 3-6, the DEIS fails to consider or analyze any alternative that requires the Army to allow community observers to monitor all military activities that take place on, or otherwise affect, leased lands. Instead, the DEIS defers identification and selection of mitigation measures to the Record of Decision, following completion of the EIS. This violates NEPA’s requirement that an agency’s analysis of alternatives “sharply define the issues for the decision maker and the public and provide a clear basis for choice among options,” 40 C.F.R. § 1502.14, “[d]iscuss each alternative considered in detail . . . so that reviewers may evaluate their comparative merits,” id. § 1502.14(b), and “[i]dentify the agency’s preferred alternative . . . in the draft statement.” Id. § 1502.14(d). The failure to identify and evaluate alternatives and mitigation measures in the DEIS renders it deficient and deprives the public of the opportunity to meaningfully engage in the environmental review process. As such, NEPA requires that the Army prepare and circulate a revised DEIS for public review and comment</p>	
Elena Bryant	EarthJustice	<p>3. Comprehensive Removal of Unexploded Ordnance As noted above, the current leases for MMR, KTA and Poamoho all oblige the Army, upon expiration or other termination of the leases, to “remove weapons and shells used in connection with its training activities.” DEIS Appendix G (1964 MMR Lease 26; 1964 KTA Lease 29; 1964 Poamoho Lease 29). All three leases, however, limit the Army’s obligation to clean up UXO to only “expenditures for removal of shells [that] will not exceed the fair market value of the land.” DEIS Appendix G (1964 MMR Lease 26; 1964 KTA Lease 29; 1964 Poamoho Lease 29). Moreover, while the Army is obliged to “make every reasonable effort ... to remove or deactivate all live or blank ammunition upon completion of a training exercise,” the current leases impose no clear duty on the Army, prior to the leases’ termination, to remove any UXO that its “reasonable”</p>	<p>Section 3.6.1 and Appendix J have been revised to add the definition of operational ranges. Current management measures to mitigate potential impacts from hazardous substances and hazardous wastes are discussed in Section 3.6.5.</p> <p>Existing Conditions discussion in Section 3.6.5.3 provides the procedures in place at MMR for areas that contain or are likely to contain MEC. Text added to the Environmental Consequences discussion under Section 3.6.5.3 states that the Army conducts range management activities to ensure that no materials, including debris, trash, and brass are left behind.</p>

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		<p>efforts may have missed. DEIS Appendix G (1964 KTA Lease 9; 1964 Poamoho Lease 9; see also 1964 MMR Lease 8 (same)). UXO on Army training lands poses grave threats to the public now, not just when leases end. That threat extends to members of the public outside of Army training facilities because shrapnel from UXO that accidentally detonates does not magically stop at the military training area’s fence line. To minimize threats to the public, the EIS should examine alternatives that mandate the Army to conduct ongoing, comprehensive clearance of UXO from all leased State-owned lands, as well as from any “ceded” lands claimed by the federal government where UXO might threaten the public when conducting activities on leased lands or on lands outside of military training areas. The Army should be obliged to continue UXO clearance until all UXO is removed, with no funding limitation. The Army has also used the presence of UXO on military training lands as a justification for restricting public access to those lands to conduct cultural, subsistence and recreational activities, inflicting significant harm on neighboring communities and cultural practitioners. To minimize such harms in the future (and to mitigate the harm that military occupation and use of these lands has inflicted in the past), the DEIS should examine alternatives that condition any lease renewal on the Army’s commitment to clear UXO from all lands at MMR, KTA and Poamoho (whether leased from the State or claimed as “ceded” by the federal government), which would remove obstacles to cultural, subsistence and recreational access. The court-ordered settlement for MMR confirms the reasonableness and feasibility of such lease conditions. To reduce the risk to members of the public using Mākua Beach and Farrington Highway (i.e., conducting activities outside MMR), the settlement requires the Army to clear UXO from “the area within MMR extending 1,000 meters mauka (towards the mountains) from Farrington Highway.” 2001 Settlement 8(a). The settlement also requires the Army to clear UXO from “additional, high priority areas at MMR” in order to “increas[e] access to cultural sites.” Id. 8(b); see also High Priority Site List for UXO</p>	<p>Lease compliance actions and cleanup and restoration activities that will occur upon lease expiration are discussed in Section 4.2.4.</p> <p>Section 4.2.4 also discusses the reasons why the lease compliance actions and cleanup and restoration activities after lease expiration, and any associated impacts with such activities, are not able to be determined at this time.</p> <p>The Proposed Action’s consistency with regulations, land use plans, policies, and controls is provided in more depth in Section 4.3.</p> <p>Cleanup of Federal lands is outside the scope of this EIS.</p>

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		<p>Clearance (June 12, 2009). [2 While the 2001 Settlement obliges the Army to clear UXO from twenty-two sites to allow for cultural access, scores of other cultural sites at MMR remain off-limits to cultural access due to the presence of UXO. See Site List and Terrain Analysis for the Identification of Public Access Priorities, Makua Military Reservation, Oahu, Hawaii (Feb. 2009).] The settlement obliged the Army to “make good faith efforts to secure the necessary funding” for this UXO clearance, without placing any cap on the required expenditures. 2001 Settlement 8(a); see also id. 8(b). Instead of considering an alternative that imposes a condition requiring the Army to conduct ongoing, comprehensive clearance of UXO from all leased State-owned lands, as well as from any “ceded” lands claimed by the federal government, the DEIS defers determination of parameters for compliance with the lease conditions until “after completion of this EIS” and “following lease expiration.” See DEIS at 2-2. This violates NEPA’s requirement that an agency identify alternatives and appropriate mitigation measures in the draft statement and deprives the public of the opportunity to meaningfully engage in the environmental review process. See 40 C.F.R. § 1502.14. As such, NEPA requires the Army prepare and circulate a revised DEIS for public review and comment.</p>	
Elena Bryant	EarthJustice	<p>4. Cultural, Subsistence and Recreational Access The DEIS fails to sufficiently evaluate alternatives and mitigation measures that would reduce adverse impacts on cultural, subsistence and recreational access to State-owned lands used for military training. For many decades, military occupation of and training on lands at MMR, KTA and Poamoho have inflicted significant harm on the community by severely limiting—and often completely prohibiting—public access for cultural, subsistence and recreational purposes. The Cultural Impact Assessment further indicates that although the Army has existing access policies in place, they are largely ineffective to ensure adequate cultural access. See Appendix B at 162. Both NEPA and HEPA require a discussion of measures to mitigate, avoid, minimize, or reduce adverse environmental</p>	<p>The parameters for historic preservation compliance and cultural access in association with such cleanup activities would be defined and determined after completion of this EIS (since these activities would be outside the scope of the current EIS), but they would comply with Section 106 and its implementing regulations.</p> <p>Section 3.2.5 discusses recreational and hunting access. The Final EIS has been revised to include the phasing and timing of mitigation measures.</p>

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		<p>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). Apart from vague proposals to “review and update the Army’s public engagement efforts,” “update and/or develop a mutually beneficial cultural access plan,” and “promote long-term stewardship of the ‘āina,” DEIS at 3-135 to 3-136, the DEIS’s discussion of mitigation measures does little to ensure steps will be taken to mitigate the significant adverse impacts on cultural practices. The DEIS failed to evaluate alternatives and mitigation measures that would minimize these harms by ensuring that, should the Army be permitted to continue its occupation and use of any State-owned lands, the public will have adequate opportunities for access on both State-owned lands and “ceded” lands claimed by the federal government. The prohibition on live-fire training and mandate to conduct comprehensive UXO removal (discussed above) will create better conditions for such access to occur. The court-ordered settlement for MMR confirms the reasonableness and feasibility of such lease conditions. The settlement requires the Army to give members of the Wai‘anae Coast community “daytime access (sunrise to sunset) to MMR to conduct cultural activities at least twice a month” and to allow “overnight access (from two hours before sunset on the first day until two hours after sunset on the second day) to MMR to conduct cultural activities on at least two additional occasions per year.” 2001 Settlement ¶ 13. The Army agreed to provide this cultural access at a time that it contemplated conducting live-fire training exercises at MMR. See id. ¶¶ 2-3. Given that no live-fire training currently occurs at MMR, KTA or Poamoho, it is both reasonable and feasible for the Army to provide more frequent public access to these training areas for cultural—as well as subsistence and recreational—purposes. The failure to include alternatives that take a “hard look” at such</p>	

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		<p>measures, renders the DEIS deficient. See Robertson v. Methow Valley Citizens Council, 490 U.S. 332, 350 (1989) (noting that NEPA requires agencies to take a hard look at environmental consequences” of their proposed actions, consider alternatives, and publicly disseminate information before taking final action) Thank you for your consideration of these comments. If you have any questions or would otherwise like to discuss these comments, please feel free to contact me via email ... or telephone ....</p>	
Marisa Buhr		<p>I am against releasing these leases to the military. The military has shown a consistent lack of respect for the land they occupy, most recently and horrifically the Red Hill oil spill. They show no remorse and no capacity for accountability with either the residents of Hawai’i or even within their own ranks.                      Ku Kiai Oahu!</p>	Please see General Response.
Adam Burch		Give the land back!	Please see General Response.
Paula Ann Burgess-Tauala		<p>Aloha. My name is Paula Ann Burgess-Tauala. I am a life time resident of Wai’anae. I am writing to express my deep concerns regarding the proposed continued use of the US Army training areas: Mākua, Kahuku, and Kawailoa-Poamoho. These lands should be returned to the Native Hawaiian and local community. I suggest that the No-Action alternative involves the US Army cleaning these areas before their leases lapse in 2029. Or that in the No-Action alternative that they propose a payment plan/process for whoever takes over these lands so they can make the areas habitable.                      Mahalo.</p>	Please see General Response.
Katherine Burke		<p>As a Boston-born settler in Hawai’i for 20 years I have witnessed extensive evidence of the harm military occupation has caused in Hawai’i. The most urgent of which to me is the sexual assault of local women and girls by military personnel. This has been well documented by the Sex Abuse Treatment Center and the Hawai’i Commission on the Status of Women. The most cataclysmic of which is the ongoing degradation of the environment from exposure to Agent Orange in Wahiawa to the infestation of</p>	Please see General Response.



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		<p>ordinances that exists across the islands including these parcels to the intentional spread of invasive species at the cost of elimination of native species. This is mirrored in the human population such that the health impacts of the military from psychological terrorism to complex PTSD to the impacts of their behavioral sequelae on chronic disease and domestic violence rates have wildly, disproportionately affected Native Hawaiians in their homeland. Not to mention that for the first time ever more Native Hawaiians live outside Hawai'i than here because of the cost of housing and competition for affordable that has been driven up by military housing vouchers. No military leases in Hawai'i! Demilitarize &amp; free Hawai'i! End the occupation that is destroying these islands and their people.</p>	
Christina Busby		<p>Aloha,                      My name is Christina Busby. I am a Native Hawaiian resident of Makiki, but I was raised in Wai'anae in the 90s and 00s, close to Makua. I do not support the renewal of the army land leases. The US military has caused irreparable harm and damage to the Hawaiian islands through its use of land and ocean for live fire training, the storage of weapons and fuel, and many other uses. It is time to demilitarize Hawai'i and return these leased lands back to the stewards of the 'aina for protection and conservation of these precious resources and archaeological sites.                      Makua, for example, has long been a site of contention, as the US military claimed this ahupua'a during the WWII period, with the promise of returning the land after war time was over. Hawaiian families with genealogical ties to Makua were forcibly removed and evicted from the ahupua'a, never to return to the valley.                      Throughout the 80s and 90s, a pu'uohonua was formed there at Makua Beach, composed primarily of Native Hawaiians, to reclaim the land that was taken. The pu'uohonua was destroyed by the state and all inhabitants of the sanctuary village were forcibly removed. But the legacy of their resistance lives on and more and more people in Hawai'i are waking up to the abuse of our land.                      It's time for the US military to clean up its mess and help the land</p>	Please see General Response.

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		<p>and the people heal. It's time to take accountability for decades of pollution and abuse of the land, which is the sacred ancestor of Native Hawaiian people. It's time to be pono and return the land back to Native Hawaiians. These sites have been blocked off to the people who are the rightful stewards of these places, blocked off to people who have unique knowledge of these lands. We are prevented from fully practicing our culture and caring for our sacred sites.</p> <p>To ensure a future world where all living things thrive, the Pacific Ocean must be healthy. And in order for our ocean to be healthy, we must have a demilitarized and denuclearized Pacific. The survival of our planet and all living things depends on this. Let's start here and now. Instead of a dominating military presence in Makua, I imagine the military and community working together to clean and repair the land. Removing invasive plants, planting native forests, bringing the rain to restore the stream, and rebuilding the traditional fishponds. I imagine a valley full of kalo terraces, a community center for youth and kupuna, and a community garden. I don't know if this is possible considering the ecological harm the land has endured, but there are so many possibilities beyond power, control, imperialism, and destruction. I refuse to believe a narrative that says military domination of these lands is the best possible outcome.</p> <p>I grew up on the shores of Makua. My father has caught many fish there to feed our family through times when money and food were scarce. And though we have moved to Honolulu, we still return to Makua to hunt for food, to heal in the water, to connect with our ancestors. I have never been beyond the military fence and up into the valley, and I dream that one day, me and my descendants will be able to freely explore Makua and aloha 'aina.</p> <p>Mahalo</p>	
Lala Kamalani Buzzell		i oppose renewal of u.s. military leases on hawai'i lands. mahalo	Please see General Response.
Donna Cabelll		Return the military leases to the Hawaiian people, Donna Cabell [signature] P.O. Box 981 96792	Please see General Response.

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Megan Cabral		I strongly oppose an extension of the army leases on Hawaiian lands. As a Native Hawaiian and a local resident who lives & works near multiple military bases, the negative impacts of militarization on our land and people are undeniable. Please return our rightful access to these lands so that we can restore our water systems and protect our native plants & animals before it's too late. Mahalo	Please see General Response.
Ellen-Rae Cachola		To Whom It May Concern, I request that the Army leases come to an end. Given the third option to reduce Army use of Poamoho, Kahuku, and partially of Makua, it shows there is already a readiness to relinquish them from the Army's control. Mission critical military training has only damaged the local environment and brought moral pain to Hawai'i as it is used to practice wars that hurt people abroad. In addition to the harm of occupying Hawaiian lands at the displacement of Native Hawaiian people, many immigrants, like Filipinos who live in Hawai'i, are upset when U.S. military training in Hawai'i is used to partner with the Philippine military to commit human rights violations on people in the Philippines. The Army leases should come to an end. All of these lands under Army leases should be returned to Hawai'i and cleaned up. We have a housing crisis and local people need homes. These lands can be used for that. We need lands to grow food to feed the hungry. Security will not come from more war preparation and violence, but from caring for people.	Please see General Response.
Eileen Cain		July 28, 2024 I strongly oppose extension of military leases in Hawai'i. The people of the islands have a right to [their] land. They should not have to be subjected to the sound of live-fire training exploding in their valleys and other lands. It is their land, and it is racist for white people, like me, to take their land. It is time to give back the land that is their homeland. Blessings on the native Hawaiians for their freedom from the nightmare of these military leases. Mahalo! Eileen Cain 720 Mahi'ai st., Apt. E, Honolulu, HI 96826	Please see General Response.
Grey Calio		Hawaiian lands belong in Hawaiian hands. You have to know that this is wrong. We deserve what you stole from us.	Please see General Response.

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Mahina Camit		‘O wau Mahina Camit a noho au ma Kahuku. Kū‘ē mau no ka ho‘olimalima Amelika I ku‘u kulaiwi. [Translator: I oppose the extending of military leases on Hawaiian crown lands.] A'ole.	Please see General Response.
Courtney Caranguian		The military has taken so much from the Native Hawaiian community. Military land leases should not continue. Give the land back to those who can malama āina instead of destroying it.	Please see General Response.
Kayson Carlos-Keliikipi		<p>I, a subject of the Hawaiian Kingdom, highly oppose the potential release of this land to the colonial imperialists which is the U.S Military. For the record, my country is not the United States as I reside in Hawai'i, an occupied sovereign state. These lands should not have ever been given to the imperialistic power of the United States because it was stolen from the Hawaiian Kingdom Government following the illegal overthrow of the Kingdom in 1893 and forced annexation under a "Joint Resolution" that your congress has no jurisdiction over without the signature of the true Hawaiian Sovereign, who was Queen Lili'uokalani at the time. With no valid treaty of annexation your American laws are illegitimate, unlawful and has no jurisdiction here in Hawai'i. You continue to commit war crimes and human rights violations in my country. You've denationalized my people forcing your laws upon us, marginalizing us in our own ancestral land and sovereign state. You will pay.</p> <p>Instead of releasing I ask that you comply with International Law and stop the belligerent occupation you and your empire have bestowed upon my people for the past 131 years as we have the right to self determination. Your presence has strategically denationalized and displaced my people by banning ‘ōlelo Hawai‘i in schools and inviting migrational settler societies where capitalism conquers all to drive out Hawaiian Kingdom subjects from their ancestral lands. You have desecrated and exploited my people and natural resources. Many of my family have moved away calling it "Priced out of paradise" but really we have been displaced due to a belligerent illegal military occupation. My family has yet to own land in our home as real estate prices rise to the multi-millions, all while the U.S Military has leased these lands for only a dollar a year.</p>	Please see General Response.

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		<p>The U.S Military should not even be in Hawai'i. What you should do is leave and pay for the reparations your belligerent occupation has caused to my country. You have violated our human rights to self determination and mark my words I will live to see the day you leave and are held accountable for your actions and I cannot wait. E ola mau ke Aupuni Hawai'i. Ma hope mākou o Lili'ulani. E mau ke ea o ka 'āina i ka pono.</p>	
Kelsey Carlos-Keliikipi		You will pay.	Please see General Response.
Kelsey Carlos-Keliikipi		<p>Aloha, he Hawai'i au mau a mau. A'ole o Amelika au, e ho'omake i nā haole a pau a e ho'omake o Amelika. Pono ia 'oukou e hele aku. Eia pae 'āina no ke Aupuni Hawai'i. E ola mau ke Aupuni Hawai'i.</p> <p>-----</p> <p>[Translation:        Hello, I am Hawaiian forever. I am not American, kill all the foreigners and kill America. You all must leave. This is the land of the Hawaiian Kingdom. Long live the Hawaiian Kingdom.]</p>	Please see General Response.
Kelsey Carlos-Keliikipi		<p>I, a subject of the Hawaiian Kingdom, highly oppose the potential release of this land to the colonial imperialists which is the U.S Military. For the record, my country is the not the United States as I reside in Hawai'i, an occupied sovereign state. These lands should not have ever been given to the imperialistic power of the United States because it was stolen from the Hawaiian Kingdom Government following the illegal overthrow of the Kingdom in 1893 and forced annexation under a "Joint Resolution" that your congress has no jurisdiction over without the signature of the true Hawaiian Sovereign, who was Queen Lili'uokalani at the time. With no valid treaty of annexation your American laws are illegitimate, unlawful and has no jurisdiction here in Hawai'i. You continue to commit war crimes and human rights violations in my country. You've denationalized my people forcing your laws upon us, marginalizing us in our own ancestral land and sovereign state. You will pay.        Instead of releasing I ask that you comply with International Law</p>	Please see General Response.

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		<p>and stop the belligerent occupation you and your empire have bestowed upon my people for the past 131 years as we have the right to self determination. Your presence has strategically denationalized and displaced my people by banning ‘ōlelo Hawai‘i in schools and inviting migrational settler societies where capitalism conquers all to drive out Hawaiian Kingdom subjects from their ancestral lands. You have desecrated and exploited my people and natural resources. Many of my family have moved away calling it "Priced out of paradise" but really we have been displaced due to a belligerent illegal military occupation. My family has yet to own land in our home as real estate prices rise to the multi-millions, all while the U.S Military has leased these lands for only a dollar a year. The U.S Military should not even be in Hawai‘i. What you should do is leave and pay for the reparations your belligerent occupation has caused to my country. You have violated our human rights to self determination and mark my words I will live to see the day you leave and are held accountable for your actions and I cannot wait. E ola mau ke Aupuni Hawai‘i. Ma hope mākou o Lili‘ulani. E mau ke ea o ka ‘āina i ka pono.</p>	
Kelsey Carlos-Keliikipi		<p>Aloha. O Kelsey ku‘ulei maka mai Carlos-Keliikipi ko inoa waianae mai ou. . . . . I'd like to start by thanking you guys for your service to your great country, the empire that has been illegally occupying my country. This is not America, and it will never be. . . . . Let me remind you, sir, that the Hawaiian Kingdom was recognized as a sovereign state by America through a peace treaty in 1849, which was ratified by the U.S. president in 1850. In 1893, you guys overthrew our -- our monarchy using militant forces and in 1898, you illegally annexed the Hawaiian Kingdom through a joint resolution without the consent of the Hawaiian government. . . . . For the past 131 years, you have been illegally occupying the Hawaiian Kingdom in violation of international law, committing the war crimes of usurpation of sovereignty. Your presence here has denationalized and displaced my people. . . . . A big example of this would be the homeless encampment not too far from here called Pu'uhonua O Waianae. Let me remind you that the only legal treaty</p>	Please see General Response.

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		<p>that has allowed your presence here is the Treaty of Reciprocity in which we allowed you, Pu'u Loa, or as you may know it, Pearl Harbor. . . . . In return, you used your militant arms and your imperialistic beliefs upon the indigenous people of this land, Kanaka Maoli and Hawaiian Kingdom nationals, to continue a belligerent occupation of my country.· All your claims to these lands are illegal and you know it and you should, and mark my words, you will be held accountable. Your American Constitution does not even mention the word environment anywhere in it.· NEPA regulations were only made in the 1960s or '70s.· I don't know, I'm not sure.· I'm not American. You claim you need makua in the name of national defense for wars that you started.· You claim to know aloha aina, but all you know is desecration and genocide.· I revoke my U.S. citizenship because where will you deport me when you are the ones who do not belong here?· Let the record show that I cannot wait until America is held accountable for all the war crimes and human rights violations inflicted upon my people and country, the Hawaiian Kingdom.· He Hawaii Au, Mau a Mau. E ola mau ke aupuni Hawai'i</p>	
Corrina Carnes		<p>I oppose the renewal of these leases due to the detrimental impact of continued military presence on housing, natural resources, cultural practices, and rights of Kānaka Maoli to their native lands. While the DEIS attempts to address some of these issues, it fails to evaluate cumulative affects of hindered access to these lands by native Hawaiians and the broader cultural and historical context of military occupation in Hawai'i. The army has fallen short of its responsibility to remediate contaminated sites on O'ahu, and future cleanup commitments are hindered by economic feasibility. The DEIS also fails to address the impact of continued military occupation on affordable housing on an island that has been in a housing crisis for decades.</p> <p>The Admissions Act set aside these lands to be held in a public trust for purposes including the betterment of native Hawaiians as defined in the Hawaiian Homes Commission Act of 1920. The military leases were never valid and should not be renewed.</p>	<p>Section 3.5.6 presents an analysis of cumulative impacts on cultural practices.</p> <p>Addressing military impacts on housing is beyond the scope of this EIS.</p> <p>Section 3.6.1 and Appendix J have been revised to add the definition of operational ranges. Current management measures to mitigate potential impacts from hazardous substances and hazardous wastes are discussed in Section 3.6.5.</p>

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Kenji Cataldo		<p>I strongly oppose the Army's retention of any of the lands at Mākua, Kahuku, and Poamoho included in this so-called "real estate action," a euphemism for continuing to withhold Hawaiian land from Hawaiians. My comments below focus on Mākua, whose details I know best.</p> <p>During the peak of World War II, the Army used Mākua through Revocable Permit No. 200 (issued by the Territory in May 1943), under which the land was supposed to be returned six months after the war ended. What was supposed to be short-term use to serve wartime needs has turned into over 80 years of destruction and occupation. Over these 80 years, the community has been deprived of these lands for agriculture, cultural practice, and residential use. Not only that, the Army has so polluted and desecrated these lands with unexploded ordnance and dangerous contaminants from the open burn open detonation (OBOD) site that it will now take a massive and expensive clean up before the community can again be on this ‘āina safely. That clean up process needs to begin now. It should never have needed to happen in the first place, certainly not on this scale, but since this is the situation inherited by today's decision makers, the process needs to start already.</p> <p>The past 60 years have witnessed immense environmental, economic, and cultural harm due to Army training and occupation of land that could otherwise be used in genuinely beneficial ways. The draft EIS even admits the current harms that would be continued. Regarding MMR Alternative 1 in the discussion of impacts on Land Tenure, the draft reads:</p> <p>"There would be continued long-term, significant, adverse impacts on land tenure because the use of the land would be incompatible with the objectives and policies of the State to hold public lands in trust for the use and benefit of Native Hawaiians and the public throughout the duration of the new lease" (3-37).</p> <p>One of the real costs of Army retention is further decades of delay before this land is cleaned up and returned to use that actually benefits the community. The postponement of addressing the harms of the past 60 years is itself another harm to current</p>	<p>The Army refers to the action as a "real estate action" to distinguish that the action to be decided on is the retention of the State-owned lands for Army use, as opposed to a proposal for additional training or construction. Nevertheless, the EIS looks in detail at the existing training that would occur on any State-owned lands retained, along with impacts and mitigation measures.</p> <p>The EIS identifies long-term, significant, beneficial impacts on land tenure for all alternatives that involve land not retained. The extent to which cleanup and restoration could be accomplished within technical and economic capabilities is subject to negotiation with the State, regulation changes, future cleanup processes and costs, and applicable future requirements that are not known. Section 4.2.4 has been revised with text regarding uncertainties associated with technical and economic capabilities for future cleanup.</p> <p>Section 3.6.5 has been revised to clarify that 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 laws and regulations to determine how and when the cleanup and restoration of State-owned lands not retained would occur.</p>



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		<p>generations who might then never see Mākua restored and returned in their lifetimes. Both the lands in the lease and the "fee simple" lands that together make up Mākua Valley must be restored and returned to culturally appropriate stewardship, with clean up beginning now in preparation for the No Action Alternative and the expiration of the current lease in 2029.</p> <p>This draft EIS is misleading in its presentation of the impacts of the various alternatives for Mākua by obscuring the benefits of the No Action Alternative. In the MMR No Action Alternative discussion on Land Tenure, the draft EIS simply says: "Impacts would be the same as those described for land not retained under Alternatives 2 and 3" (3-41). There is distance inserted between this alternative and its immense benefits, as named under those other alternatives: "There would be new long-term, significant, beneficial impacts on land tenure through resumption of State control of the land not retained for the use and benefit of Native Hawaiians and for the public" (3-39).</p> <p>Let's put it together: The No Action Alternative would bring new long-term, significant, beneficial impacts on land tenure. The community knows that the Army leadership knows that the No Action Alternative is the most beneficial to the public, because the draft EIS admits it. I urge the Army to choose the No Action Alternative and release these ‘āina. They have been held hostage for too long already.</p>	
Marian Chau		<p>The draft EIS does not acknowledge the US military's central role in the illegal overthrow, occupation, and colonization of Hawai‘i, which caused significant harm to Kānaka Maoli, nor does it take full responsibility for ongoing harms. While the army's natural resources programs have done some good work to begin mitigating past wrongs, it is a drop in the bucket. The damage the army has done to our ecosystems, environments, and local communities at Makua, Poamoho, and Kahuku (like all military activities across Hawai‘i) is extensive, and will become irreparable if military training activities continue for decades more to come. Endangered species may go extinct, and fragile ecosystems will reach a point of no</p>	Please see General Response.

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		<p>recovery if their native species and their local genetic diversity are lost. The US Army has not been good stewards of the land. The ‘āina should be returned to its rightful stewards, Kānaka Maoli, who treat the land with respect and preserve it for future generations. The proof is on Kanaloa (Kaho‘olawe), where the devastation from 50 years of military training will take multiple generations, perhaps centuries of work to restore, and yet Kānaka Maoli today are doing exactly that, knowing they won't live to see full restoration, doing it for their mo‘opuna. We must end the militarization and the colonization now, so the healing of people and land can begin.</p>	
Cassandra Chee		<p>Do not renew military leases in Makua, Poamoho, and Kahuku. This 'āina was taken without consent or compensation of Kānaka Maoli. When the leases expire the land should be restored and returned to Kānaka Maoli stewardship with compensation for the damages and use of stolen lands.</p>	Please see General Response.
Jacob Chinn		<p>Aloha, I would like to voice my opposition to the extension of U.S. Army Land Leases on Hawai‘i. It is nearly impossible for local folks to afford to remain on the islands. Given our limited resources, especially related to land on the island, leased lands need to be returned to the state for possible other uses, especially housing, agriculture, and preservation. Reducing the size of army lands, will not only increase the opportunity for other land uses increasing the possibilities of locals being able to stay on the island, it may also release the number of army personnel on the island. This too, could reduce housing demand opening up the opportunity for local residents. Please do not extend or renew these leases. Mahalo, Jacob</p>	Please see General Response.
Glenn Choy		<p>The cost-benefit balance tips heavily against the impacted communities of Hawaii with military occupation and exploitation. Hawaii would be immensely enhanced by the absence of military exploitation, and probably more secure. Hawaii bases figure centrally in Chinese war planning.</p>	Please see General Response.
Carl Christensen		<p>Section 1.4.3.2: Endangered Species Act. This section recognizes that the Army must comply with the requirements of the Federal Endangered Species Act, but fails to recognize and the Hawaii Board</p>	<p>Section 3.3.5 provides analysis for both lease and fee simple title. A new lease might require more protections; the Army cannot predict what those</p>

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		<p>and Department of Land and Natural Resources must also comply with the requirements of the Hawaii Endangered Species Act, Chapter 195D, Hawaii Revised Statutes, which may impose responsibilities beyond those required to comply with the Federal Act. The FEIS must address any additional requirements imposed by this legislation. The same issue arises in Section 3.3.2 of the DEIS.</p>	<p>protections would be, and therefore, cannot predict what the difference in impacts, if any, would be.</p> <p>As noted in the EIS, protection of State-listed species occurs when it is practicable as outlines in the installation's INRMP, which includes the availability of funds. Additionally, in accordance with Department of Defense Instruction (DoDI) 4715.03, the Army protects State-listed species, to the extent practicable. Impacts to listed species are described in Section 3.3.5.</p> <p>Volume II Appendix J describes the regulatory framework to which the Army complies.</p>
Carl Christensen		<p>Chapter 3: Affected Environment and Environmental Consequences                      Section 3.2.4 states that "The State would hold in public trust the State-owned land not retained by the Army" for the purposes set forth in Section 5(f) of the Hawaii Admission Act and HRS Section 171-18. This implies, incorrectly, that the State's responsibilities under these provisions (and the additional non-waivable obligations imposed on the State under such provisions as Article XII, section 4, and Article XI, section 1, of the Hawaii Constitution) would cease with regard to any State-owned land retained by the Army under the terms of any eventual lease. This is not so; the entering into such a lease would not terminate the State's responsibility to comply with these provisions, and the Hawaii Supreme Court, in its 2018 decision entitled <u>Ching v. Case</u>, recognized that these responsibilities can be enforced against it in a suit brought by beneficiaries of these public land trusts. As with Chapter 195D, HRS, mentioned above, no State law allows the State to abdicate these responsibilities, and the Army, like any lessee of State lands, must comply with them and all other State laws applicable to public lands. Indeed, since <u>Federal sovereign immunity</u> would prevent State citizens from suing the Army directly to enforce these</p>	<p>The State would still retain management authority under a new lease. Requirements under a new lease would be subject to negotiation. Only Congress can waive the Federal government's sovereign immunity. Such a waiver would not be necessary because lease provisions would be enforceable by the State as a matter of contract. Citizens could bring actions against the State for failure to enforce the provisions of the leases. The Ching litigation (i.e., Ching vs. Case) demonstrates that citizens are heard in court on such matters.</p> <p>Compliance with HAR Chapter 13-5, Conservation District, has been revised and is discussed in Sections 1.4.3 (Table 1-2), 3.2, and 4.3.2 (Table 4-3). 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>

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		<p>requirements, the FEIS must address the question of whether the State would be in breach of its trust duties if it fails to include in any <u>lease to the Army a requirement that the United States explicitly waive its immunity to allow citizen enforcement against the Army directly</u>, since the Ching case demonstrated that the State cannot be relied upon to enforce these requirements against the Army. Section 3.2.4 also states that the State will be requested to accept a petition to authorize a special subzone in the conservation district to allow military uses on leased lands. <u>The FEIS should address the questions of whether existing State law would allow for the acceptance of such a provision</u> and, if not, what new State legislation or regulations might be required to authorize such use.</p>	<p>Such a special subzone would be novel and represents a departure from current conservation district uses.</p>
Carl Christensen		<p>Chapter 6: List of Preparers The DEIS includes among the Government Contributors Ms. Hilary (Kapua) Kawelo of the U.S. Army Garrison-Hawaii. Ms. Kawelo is active in the Army's efforts to conserve Achatinella species on the MMR, but the extent of her experience in other sites under review is unknown to this reviewer and is not apparent from the references cited. The list of Consultant Contributors, on the other hand, lists no individuals identified and having any knowledge of Hawaiian non-marine mollusks, an important and highly endangered element in the native biota of the sites under review for possible retention by the Army. No mention is made of any consultation with recognized experts in this field at DLNR, The University of Hawaii, or Bishop Museum, the persons who could be expected to have the most accurate and up-to-date knowledge of the status of this element of the fauna. <u>The absence of any mention of consultation with Dr. David Sischo of DLNR's Snail Extinction Prevention Program or Dr. Norine Yeung of Bishop Museum, who with her associates has been actively surveying the status of Hawaii's native land snail fauna, strongly suggests that the DEIS's review of this element of the native biota is deficient</u> and is in need of substantial supplementation.</p>	<p>USAG-HI Natural Resource staff coordinate closely with experts at the Bishop Museum and DLNR. The Army also has a rare snail conservation biologist permanently on staff through the University of Hawai'i who is in communication with all of the nonmarine snail experts and collaborates in working groups and projects.</p>
Carl Christensen		<p>Draft Environmental Impact Statement, Volume III: Appendices E-1 Part II Table H-3: KTA Native Species The only native land snail species listed here as inhabiting the KTA is an unidentified species</p>	<p>Per NEPA and HEPA requirements, the best available data for biological species has been incorporated into Section 3.3.5 and Appendix H,</p>

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		<p>of the achatinellid genus Tornatellides. <u>It does not state what surveys of the land snail fauna of the KTA has been undertaken, and there can be no assurance that additional native species may not occur there.</u> An archival survey of the occurrence of Achatinella on Army lands (Christensen, 1983, An Archival Survey of the Endangered Oahu Tree Snail (Genus Achatinella) on U.S. Army Support Command, Hawaii, Installations), not referenced in the DEIS, revealed the historical occurrence of Achatinella species within the KTA, information worthy of mention here.</p>	<p>including Christensen 1983.</p> <p>Additional species information has been included where available.</p>
Carl Christensen		<p>Table H-7: Poamoho Native Species The current status of protected Achatinella species at Poamoho has been documented in USAG-HI (2008a), cited in the DEIS. Table H-7 purports, however, to be a comprehensive listing of all other native land snail species present within the site. None of the titles of the references cited as supporting this Table (USAG-HI 2010b, DLNR 2015a, Kawelo 2022b, 2022e) appear to address the non-Achatinella land snail species present within the area. This table's listing of such native species within this site is <u>seriously deficient with regards to the native land snails present: only Philonesia spp., Succinea spp., and Tornatellides/Tornatellina spp. are mentioned.</u> No citations is provided to any recent on-the-ground surveys of the other native land snails of the site. In the absence of such data there can be no assurance that the Army's knowledge of the land snail fauna of the site is complete. The Army should conduct such studies BEFORE any FEIS is approved for this land retention. Furthermore, it is highly likely that additional native species beyond the sparse numbers listed here will be discovered in the course of such studies. In short, the treatment of the site's land snail fauna is sorely inadequate and legally insufficient to meet the disclosure requirement of NEPA and HEPA. The report claims the presence of snails identified as "Tornatellides/Tornatellina spp." Tornatellina is a genus the distribution of which is restricted to the islands of Juan Fernandez, off the coast of South America; it does not occur in the Hawaiian Islands. This important distinction has been well-known since at least the 1960s. "Tornatellina" is likely a misidentification of one or</p>	<p>Section 3.3.5 and Appendix H have been updated with additional survey information. The Proposed Action does not include any construction or additional training activities. Poamoho has not been used for ground training in over 15 years and no such training is anticipated. Because of this and the environmental conditions (i.e., impenetrable jungle), it has been a low priority for biological surveys.</p> <p>Per NEPA and HEPA requirements, the best available data for biological species has been incorporated into Section 3.3.5 and Appendix H, including Christensen 1983. The Army, in collaboration with agencies including the Division of Forestry and Wildlife, has conduct extensive and ongoing surveys of endangered snail species at Poamoho. Survey efforts are comprehensive and not limited to a single event across the area, with data collection being a continuous, coordinated effort.</p>

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		<p>more species of Lamellidea or Pacificella, but their true identities cannot be determined until the material is examined by competent malacologists. This glaring error in basic molluscan taxonomy casts serious doubt on the adequacy of the malacological investigations relied upon in the preparation of this portion of the study, and thus this estimate of the molluscan diversity at the site cannot be regarded as acceptable.</p>	
Carl Christensen		<p>Table H-11: MMR Native Species As with Poamoho, the status of protected Achatinella at MMR is addressed in the references cited. The <u>listing of other native land snails provided here is seriously incomplete, however; only Amastra rubens, Auriculella ambusta, Auriculella sp. aff. castanea, Auriculella sp. aff. perpusilla [almost certainly the species recently described as Auriculella gagneorum], and "Auriculella Partulina dubia" [error; should be corrected to read "Partulina dubia"]</u> are listed. The presence of living Partulina dubia is particularly significant as post-World War II records of its survival are vanishingly few. Additional native land snail species known to have been present on the site in the course of a 1984 field survey of the site (Christensen and Hadfield, 1984, Field Survey of Endangered Oahu Tree Snails (Genus Achatinella) on the Makua Military Reservation, Oahu, Hawaii, a reference not cited in the DEIS) include Tornatellides spp., Philonesia sp., Nesopupa sp., Pleuropoma sandwichensis, and Leptachatina sp. In light of the obvious inadequacy of the inventory provided in Table H-11 additional on-the-ground surveys should be conducted to more fully document the native land snail fauna of the site.</p>	<p>The EIS uses the most recent and available data for analysis. <i>Partulina dubia</i> species name has been updated. The Proposed Action does not include any construction or additional training activities.</p> <p>The Army, in collaboration with agencies including DOFAW and experts at the Bishop Museum, has conducted extensive and ongoing surveys of endangered snail species at Poamoho. Survey efforts are comprehensive and not limited to a single event across the area, with data collection being a continuous, coordinated effort. All relevant data regarding endangered snail species is documented and shared between involved agencies. However, to safeguard these species, this data is not publicly available.</p> <p>The Army also has a rare snail conservation biologist permanently on staff through University of Hawaii who is in communication with all of the nonmarine snail experts and collaborates in working groups and projects.</p>
Barryn Chun		<p>As a lifelong resident of Oahu and knowing the context of Hawaiian history, I say that there should not be any retention of the land by the US or its military once the leases expire. I object to any renewal of the leases, it should be allowed to lapse.</p>	<p>Please see General Response.</p>

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Barryn Chun		Hi. I spoke yesterday, so I'll just keep this short. As a lifelong resident of Oahu, born and raised, I oppose the renewal of these leases. No-action alternative, but also give this land back to the people of Kahuku. And to all of you, wherever you are from, keep building and organizing power so that they cannot object. Military or state, that auntie who spoke earlier should not have to worry about her son's grave. Thank you.	Please see General Response.
Barryn Chun		Okay. I just want to speak as a resident of Oahu, born and raised. I am not Kanaka Maoli, not Hawaiian, and yet, I've been told the proper context about the history of Hawaii, of how she was forcefully stolen from her people by a literal 1 percent bourgeois at gunpoint. Of how her people were violently forced off of their land, their language and culture violently suppressed. Of how their land was ever since used and abused for weapons testing, extraction, and profit. . . . . And your country was the one behind all that, so it continues. Your bombing hasn't stopped. Your exercises have not stopped. One of your facilities have contaminated a whole aquifer with fuel and probably soon PFOS and the state that you walk hand in hand with has done nothing to prevent the sale of our housing to investors, to the wealthy, allows water diversions for corporations. It makes the people of Hawaii poor, houseless, and leaving. Almost like it wants that to happen. I don't know. . . . . So, again, even just as a resident, I say no action. Land should be given back to the people of Hawaii, period. I have nothing against you specifically. I hope if you decide to understand and if you decide to follow directions. I have nothing against veterans specifically if they decide to understand and also follow directions. But your institution, however, has overstepped its bounds here and across the world. I see what your country is instigating, and I see who your country is slaughtering. This will not end until it is made right.	Please see General Response.
Kaala Clarke		Absolutely against any American governmental force agency or entity including military, army, navy occupying any more of Hawaiian lands. You have not cared for the land you occupy look at red hill, Pohakuloa, Kahoolawe many examples of this. My Family is not in support of the Army leasing or using any more land in Hawaii.	Please see General Response.

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Anoilea Clemente		<p>I am writing to express my strong opposition to the Draft Environmental Impact Statement (EIS) for Army Training Land Retention at Kahuku Training Area (KTA), Kawailoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O’ahu.</p> <p>The cultural significance of these lands to the Native Hawaiian community cannot be overlooked. The preservation of these areas is crucial for maintaining our cultural heritage and practices that are deeply rooted in our land.</p> <p>The proposed retention of these lands for military training also poses significant environmental and social concerns. The continued use of these areas for military purposes threatens the delicate ecosystems and biodiversity unique to O’ahu. Additionally, the potential for increased noise pollution, soil degradation, and water contamination could have long-lasting negative impacts on the local communities and natural habitats.</p> <p>Furthermore, I urge the decision-makers to reconsider this proposal and explore alternative solutions elsewhere.</p> <p>Mahalo for considering my perspective.</p> <p>ā hiki i ke aloha ‘āina hope loa, Ano’ile’a Clemente</p>	Please see General Response.
Taylor Collier		I oppose.	Please see General Response.
Ally Coloma		Take Hawaiian land out of the military. The military has taken away so much and continues to take away so much. It is time to do right and return is back to the Hawaiians.	Please see General Response.
Kimberly Compoc	Women's Voices, Women Speak	<p>This letter was submitted in the 2021 EIS public comments, but the Army did not include it. The sentiment of our group is still relevant and has not changed so I am re-submitting.</p> <p>Women's Voices Women Speak organizes for demilitarization, peace and genuine security in Hawai'i. We are an affiliate of the International Women's Network Against Militarism established in 1997 by feminist peace activists from Okinawa, Guåhan, Puerto Rico, Vieques, the Philippines, South Korea, Turtle Island (North America), and Japan. We have visited and learned from communities devastated by U.S. militarism. We have listened to the experiences of women and children "living alongside the fence line"</p>	Please see General Response.



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		<p>of U.S. military bases. We dearly love Hawai‘i, our home, and our communities, just as our sisters across the Pacific love theirs. We have felt the power of sharing our intersecting histories and cultures while honoring and supporting indigenous communities and ways of life. In a world shaped by U.S. colonization and militarization, we are building relationships of connection and care. We promote and practice a feminist vision of "genuine security" in opposition to military security, which over the last 20 years has cost 801,000 lives globally and cost \$8 trillion to U.S. taxpayers. The COVID-19 global pandemic has claimed 4.5 million lives, another devastating statistic revealing that massive military spending does not protect us. The United Nations has called for a global cease fire, and we must heed that call.</p> <p>Genuine security requires that we face the foolishness of the path we are on. Right now our youth learn a culture of violence and domination and those with the least opportunity are recruited to go to war. Our land and waters are contaminated by military pollution, yet lands and waters of the peoples we go to war with are even more contaminated. Our planet needs an urgent revolution in values to sustain life, to ensure that people’s basic needs are met, and that human dignity and sovereignty are respected.</p> <p>The State currently holds four leases with the Army that will expire in 2029. This is an important opportunity to choose a common-sense path toward survival and peace. The EIS scoping process has begun, and as a community, we need to demand the EIS include the following:</p> <ol style="list-style-type: none"> <li>1. The traumatic impacts on affected communities over the course of the 65-year lease and into the future, especially on Native Hawaiians, who have a genealogical relationship to‘āina.</li> <li>2. The legal reality that significant portions of these lands are Hawaiian Kingdom Crown and Government lands that were transferred illegally in the overthrow and annexation of the Hawaiian Kingdom.</li> <li>3. The traumatic impacts on women and girls, who are at higher risk for rape and sexual exploitation in a highly militarized society.</li> </ol>	

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		<p>4. The environmental trauma (live-fire training, hazardous waste, and unexploded ordnance) to ‘āina, sacred cultural sites, native ecosystems, and endangered species.</p> <p>5. The many positive impacts of not renewing these leases, the "No Action Alternative."</p> <p>6. The Army states that training on these lands is "essential to their mission." The EIS must include community testimony about how these lands are essential to their own missions and visions for their communities.</p> <p>Public lands should serve the public good. We adamantly oppose the continuation of \$1 for 65-year leases to the military, a bitter insult in a housing market where the median price of a home is nearly \$1 million. We call on the military to be accountable for the injustice and harm it perpetuates by:</p> <ul style="list-style-type: none"> <li>● Cleaning up environmental contamination in former and current military sites to safe standards for plant, animal and human life</li> <li>● Moving funds from military and police budgets and investing in community-driven models for education, healthcare, housing, clean energy, sustainable food systems, and social services for all</li> <li>● Returning these lands to Native Hawaiian stewardship and respecting indigenous peoples' sovereignty in all realms of decision making</li> <li>● Bringing justice, reparations, and healing to victims/survivors of military violence</li> <li>● Bringing home troops stationed abroad and taking care of veterans when they return home</li> </ul> <p>Hawai'i cannot thrive while remaining dependent on tourism and militarism. We need a life-affirming, sustainable and indigenous economy. 30,000 acres of public land at Pōhakuloa, Kahuku, Kawailoa/Poamoho, and Mākua could support jobs in agriculture, education, biocultural stewardship, culture-based science and technology, and other innovative community-driven industries. Development should not be something we submit to. Development can be something we determine for ourselves. We can follow indigenous economic models that revitalize our ecosystems, our</p>	

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		<p>cultures, and our communities.                      Military training devastates, destroys, and desecrates 'āina to the point that it can no longer support life. All life comes from 'āina, and we have a humble and critical role as its stewards. We oppose U.S. colonization, occupation, and militarism in Hawai'i, in the Pacific, and across the world. We oppose using 'āina as a training ground for killing abroad. We call on the U.S. military to return these lands to Native Hawaiian communities to develop models of genuine security that will lead to vibrant, abundant, safe, and sovereign futures for Hawai'i.                      Comments on military leases were due to the EIS on September 1st. As things progress, we urge our community to stay informed about this important issue.</p>	
Kimberly Compoc		<p>I am writing in strong opposition to the renewal of the Army leases. I strongly support the No-Action alternative.                      I am a professor of history at University of Hawai'i - West O'ahu and an organizer with Women's Voices, Women Speak. I am not Hawaiian but my family came to Kahuku over 100 years ago from the Philippines and we love these islands too. As a Filipina heritage person, I know the pain of U.S. colonization and militarization and the harm militarization causes to women in particular. I stand in solidarity with Kanaka Maoli and other land and water protectors around the world who demand the U.S. military get out.                      The expiration of the three leases on O'ahu is an important opportunity to choose a common-sense path away from permanent war and occupation. Unfortunately, the EIS is woefully inadequate as it neglects to address the cultural and spiritual harm the military has inflicted on the people of Hawai'i. This is not a real estate translation. Our relationship with land must be a sacred commitment to stewardship, not extraction. The EIS also makes clear that the military has no plan to treat the land any differently than it has over the last 65 years. This is a disgrace.                      Real democracy would require you to listen to the people who spoke with one voice at all these public scoping meetings: It is time for you to go. I watched in amazement at the in-person testimony</p>	Please see General Response.

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		<p>in both Kahuku and Wahiawa, and I watched the televised testimony from Wai'anae and Pōhakuloa. I have never witnessed such total consensus to protect the land from militarization. The Red Hill disaster exposed the military for its lies and corruption. Your propaganda no longer works. All four communities agreed it was long past time for the military to admit to their crimes and begin to heal the damage it has caused.</p> <p>As the EIS states, there will be "long-term significant adverse impacts" to the land. As far as the impacts on the people, the testimony in Wahiawa in particular made clear that the sound pollution caused by your training encroaches on people's ability to live a normal life. Hawaiians made it clear they have put up with the insult to their culture and land for long enough. As Joy Enomoto stated, "You are the ones who owe an explanation to the people of Hawai'i for the years, for the centuries of desecration you have brought...We Kanaka are never going to give up." We are all inspired to keep fighting for true aloha 'āina.</p> <p>Tomorrow is the one-year anniversary of the Maui fires. The climate disaster demands we stop on this foolish path of delusional thinking that military spending will bring peace and stability. In fact, it has created the opposite.</p> <p>I repeat: No retention of the lease. No extension of the lease. The only reason we want to see the military on these lands is to clean up the mess they have left so we can build a path toward survival and peace.</p>	
Kathleen Corpus		<p>Aloha kākou (speaking in Filipino). My name is Kathleen Corpus, and I am a settler from the Philippines, grew up in Kalihi. And I am here to oppose the US Army's retention of all state lands in Kahuku, Kawailoa, and Makua, on the island of Oahu. I'm a proud graduate UH Manoa in American studies and political science program, deepening my understanding of how my Filipina identity intertwined with Hawaii's history. In Hawaii, we have a legacy of survivance, where Filipinos, Kanaka Maoli, and Pacific islanders embrace our cultures, identities, and traditional practices. We refuse to pledge allegiance to a nation and hegemonic institutions</p>	Please see General Response.

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		<p>that render our ethnic identities obsolete. Your request to use these lands is unacceptable because of your poor record in being the stewards of this land. There's a saying that the health of the land is the health of the people. Yet you've destroyed the aquifer in Kaho'olawe, deprived residents of clean water at Red Hill. Your military activities, including incessant gunfire, noisy helicopters, and environmental pollutants, like falling ashes, to really impact the well-being of our people who reside here. Again, we refuse to support the US Army training on these lands. History showed that your training activities often serve to perpetrate US imperialist agendas worldwide. You're training soldiers who contribute to conflicts and commit genocide in places like Palestine and Sudan. Let me point this out. Our community holds a solution. We are capable of stewarding these lands and practicing aloha 'aina. We demand that these lands return to Hawaii, so we can restore our food systems, reclaim cultural practices vital to our livelihoods. And military training are fundamentally incompatible with 'aina-based values. Continuing to desecrate and exploit these lands is unjust. The true alternative is clear. Return these lands, where our leaders are ready to govern responsibly. We stand united in our determination to protect and preserve these sacred lands. Aloha and (speaking in Filipino).</p>	
James Cowles		<p>Aloha. I don't have a written statement. I'm not Hawaiian. I don't have Hawaiian lineage. My three kids are part Hawaiian of my wife of 42 years. . . . . As you can see, I'm former military. I give you credit for sitting up here in front of the firing squad. It must be hard to do all by yourself. [Moderator: I'm here] I give you props for that. Well, you -- you're not military either, but --[Moderator: I'm teasing] Yeah. No, I get it. . . . . But I've trained at Pohakuloa. I've trained in Kaho'olawe. I have trained in Makua. And at that time when I was training, we just follow orders just like you do. You follow orders from your higher ups, and I appreciate that. But Makua Valley, that's the only one I'm going to speak of so far for tonight. Makua Valley should be given back to the people, should be given back to the Leeward Coast. . . . . I'm a retired truck driver</p>	Please see General Response.

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		<p>of 42 years over here, and I've been up at the back of Makua Valley with my semi delivering material up there. And the military personnel that met me up there told me stay on track. You go off track, there's unexploded ordnances up there. . . . Now, I know what a 1,000-pounder can do. I know what a 500-pounder can do. I know -- I don't know if they still use them, I know what a 250-pounder can do. When they hit the ground, they don't explode, they make a big crater regardless. And eventually, the land covers it. . . . Kaho'olawe they said it's clean. No, it's not. There's a lot of ordnances that are buried. Just like Makua, there's a lot of ordnances in that valley which are buried after all the years of being used as training. . . . Now, and I know it's not -- I know it's not your decision, but I know your higher ups, but that valley has to go back to the Leeward Coast. Thank you.</p>	
Cross Crabbe		<p>Aloha, Ahiahi kakou. Cross Mahkani Crabbe. No Waianae mai au he pua au o kēia wahi noho like. Aloha. My name is Cross Mahkani Crabbe, born and raised in Waianae, and I'm here to testify against the renewing of military leases. . . . I would like to share an olelo no'eau or Hawaiian proverb. Ho'i hou I ke 'ehu me he moi lā. Returns to the broiling sea like a moi fish, which means people who leave home to get better skills eventually come back. . . . Let me stress, you're not talking to dummies over here, okay, or degenerates. There are people here, including myself, who have left our home to become more educated and there are those who have educated themselves from the resources here, and we all gather here today to speak our truth. . . . Our truth is that we have suffered enough. We have suffered enough. For the second draft of your EIS on page 445, section 5, page 27, lines 11 through 14, under unavoidable significant adverse impacts, specifically cultural impacts. You folks state, "A large new lease would sustain feelings of emotional and psychological distress, as well as an ongoing perception of that their traditional and culturally important land is under an unjust military occupation." . . . This is not just a perception. This is a reality. This is our reality. The military was used to steal our land, our language, and culture. In fact, we are</p>	Please see General Response.

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		<p>blessed that those before us fought so we could voice our opinions here tonight without fear of being shot or imprisoned. . . . I want to feel bad for you folks having to deal with all of this. I really do, but I cannot. Your institution did this to itself. And it's legacy that you folks are going to have to decide if you'll be on the right side of history or not. Give the land back and clean up your mess. . . . I call my Uncle Israel Kamakawiwo'ole into this space when I say from West Makaha to Mount Ka'ala aola Makua.</p>	
Lynette Cruz		<p>Don't need a name? Okay. I'm good. We have a lot. We are a lot. We can teach the military. We can teach the world so much if you would listen. Our land means life. Our seas mean life. We can teach people wars do not mean life. Wars are bottom of the list. That's the last thing you want. Preparation for war is right above the bottom of that list. We have much to offer. . . . Your military people, they come here, they love it. Tourists come here; they love it. Other islanders come here; they love it. Foreigners come here; they love it because in aloha, we can give. We don't have to destroy. And that's what we're trying to save and keep for generations to come. We can't do this if we destroy what we have, what we've had, now. . . . Your military people come here; they go away different because they felt the aloha in this aina. Ask any of them. They do feel it. What these people feel now, we can offer this. No destruction. We can offer you aloha. We can show you love in Hawaii. That fills our people, it fills our aina. We can share this, and we'd love to.</p>	Please see General Response.
Shondell Dabis		<p>07/28/2024          My Name is: Shondell Leinanimāpua'ala Dabris, I oppose the Renewal of the Military leases of Kahuku and Makua. The military has brought nothing but destruction to my Āina! [signature]</p>	Please see General Response.
Kanoekalani Dabis-Tolentino		<p>Aloha my name is Kanoekalani Dabis-Tolentino and I am a kanaka. I do not agree with the [renewals] of the military leases for hawaiian lands. There have been way to many times the military failed vs kanaka and damaged the land. Waters being "poisioned" native animals, plants being killed off. It is not right nor is it Pono. I don't agree nor support. Keep the 'āina in hawaiian hand! ho'i ho'i</p>	Please see General Response.

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		ka 'āina i nā kanaka maoli. [signature]	
Koda Daily		The military is no good. The point of it is to protect, right? Then why does it pollute and destroy everything in its path? Rimpac comes and off duty your soldiers are at strip clubs. Degrading women. Degrading virtue. Have you no awareness of cause and effect? The root of the problem is that the human race won't accept each others differences and uses violence to obtain power and control.	Please see General Response.
Lynell DaMate		My name is Lynell DaMate. Everyone calls me Auntie Lynell. I was born and raised here in Kahuku. I'm the youngest of 11 siblings. I graduated back in 1974. I know everyone's trying to do the math. I'll help you. I'm 68, okay. Anyway, a lot of the comments that were made by people that's lived here a long time, I should have spoken up at that time when she asked for -- when that beautiful young woman asked about if anyone knew anything that was going on at the time. Back in the '60s, ordnances back here in the Kahuku area, at that time, you guys were already leaving your opala. You know how I know? Because my oldest brother, being a boy, being curious, checked out that pile of opala, and he ended up getting burned. His whole half of his body caught on fire from all that gunpowder, and he ran from what we used to call Red Hill -- if anyone's familiar with the tracks back here -- he ran from Red Hill and Tent City, because that's what the soldiers would live in, right, when they were training. So he ran from there all the way to Kahuku Hospital with his skin just sloughing off. So that, leaving your guys' junk, it's a long time ago. It started a long time ago, hala. Anyway, I do agree with a lot that people said tonight. And you know what? I really practiced for tonight. I wrote things down, what I wanted to say. But in order to avoid being really redundant, what I did want to point out is that I recommend to you, sir, that when you do your introduction in the beginning of the meeting -- I'm going to ignore that one -- the introduction, you need to leave out that part that you say you guys clean up. You guys never clean up. So you need to take that out of your introduction. And you need to also advise	Please see General Response.



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		that commander, that commander of the whole Pacific fleet, in Sunday's paper, he mentioned about how they clean up. You guys never clean up. So the footprint that you guys, leave all the military branches starts with colonization, forced assimilation, desecration, and destruction. That is the footprint of the military. And no matter the continued lies, the continued deception will not wash away. Because you know why? We all see you. Thank you.	
Mara Davis		Aloha, DON'T renew lease for Kahuku Training Area (KTA), Kawaiiloa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O'ahu. The land is literally being bombed and bullet shells are everywhere.	Please see General Response.
Konane de la Nux		I oppose all military leases in Hawai'i on Hawaiian lands. No to any and all renewal of land occupancy by the military in Hawai'i. They continue to damage our 'āina & the wellbeing of our people. 'A'ole loa!!	Please see General Response.
Dianne Deauna		NO TO RENEWAL OF THE LEASES! NO TO CONTINUED U.S. MILITARY PRESENCE IN HAWAI'!! The Draft EIS talks about a NO ACTION ALTERNATIVE where the Army would not retain any of the State-owned lands at the O'ahu training areas after the expiry of the leases in August 16, 2029. The DEIS states that a significant, beneficial impacts on land use, cultural practices and environmental justice would occur. The Army would have no access to U.S Government-owned infrastructure and utilities within the State-owned lands. The DEIS attempt to minimize the impact of this alternative by saying it "creates the greatest potential for encroachment and accidental or intentional trespass among the alternatives considered because the adjoining U.S. Government-controlled land would then be adjacent to parcels not controlled by the Army". The truth is that gaining control back of these lands would be beneficial to the people of Hawai'i - to ensure that the land is taken care of for the next generations, NOT TO SERVE THE U.S. WAR MACHINE!	Please see General Response.
Keoni DeFranco		Aloha kakou. Aloha kakou. 'O Keoni ko'u inoa. No Waimanalo mai au. I'm against the renewal of any lease across Pae Aina	Please see General Response.

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		<p>Hawaii. The U.S. Military is the greatest threat to life to the people of Hawaii. No other nation on earth has stolen our land, poisoned our water and displaced our people at gunpoint. Only you, only the United States of America. And now you ask us, a population driven into poverty as a result of your policies, our opinion on the renewal of a lease on land that you stole, that you bombed, that you poisoned, and that you refused to pay for the lease of. In honor of our ohana in Waianae last night, I ask everyone in this room to stand up if you are against renewal of this lease. Aloha aina. Aloha aina. Aloha aina. I love you, Uncle Kakou (phonetic). The only conversation we should be having tonight is to set the timeline for the deoccupation of Kahuku and to ensure that there's a budget created to ensure that every bullet fired and every bomb exploded in this region is cleaned up. You stand here tonight as the representative of a commander in chief that is actively committing genocide in the world. The only pono thing for you guys to do is to look in the mirror, find your values, and turn in your uniforms, and make sure that you clean up on your way home. 'Onipa'a kākou.</p>	
Sousy Deltoro		<p>I was going to come up here and babble you guys all with, you know, my great Hawaiian this-and-thats. But then I said nah. Because I'm very ashamed. Very ashamed at how we act. Terrible. Terrible. Now -- now -- and here's why. Okay? And here's why. See this thing right here? How many people came up here and read off of this thing? A lot. Right? And do you know what? Young Lieutenant del Toro, in Korea, they gave him one of these things, and said, "You know what? You are going to travel 90 kilometers every day. You are going to use this to try and get around, while everybody else is using a compass." Who brought that to us? The military. What is this today? Something you can't live without. Please be mindful of the things that the military has given you, because they've given you and me a lot. The road you ride on tonight. Guess what? Federal money. Okay? Oh. That airplane that you're going to go ride on to go visit your ohana, other islands? Federal people. Right? DOD guys. You can grumble a lot, but you also got to look at the rest of it, which I know we are not</p>	Please see General Response.

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		<p>doing. What I do have for you, though, is from last night, as we listen -- okay. Maybe there's a couple great things that we can use. But here's something that I really hope we're going to do, because Kurt Fevella showed you the way last night. But how many of us are going to go do that? How many of us are going to go down to the capitol, or make a piece of paper like this, a petition? Right? Please do that. And the reason why is I've done that in my homestead, and it has been fruitful. Okay? So please take the time to do some positive things also. Because these guys is not the problem. Okay? It's those guys. Okay? You can start with Dawn Chang. You can start with the governor. Go knock on their doors. Aloha. Thank you.</p>	
Haley Demers		leave hawaii and give the land back to the native people	Please see General Response.
James Denzer		<p>I grew up on the North Shore. It is truly pathetic and disappointing that Hawaii's people are constantly displaced by offshore wealth and the American Military. If the government cannot honor the laws that they instated themselves, and if the government cannot protect the environment that nurtures MY FAMILY, then WHY should I trust the military to keep their promises? Why should I trust the military to protect and respect my family and my home? Every night we can hear the military training sessions. Helicopters fly overhead every day. And all is I can see is the environmental damage. I wait patiently with hope that justice for the environment will be served. Let locals tend the acres and acres of stolen hawaiian land... please.</p>	Please see General Response.
John Desoto		<p>Hello, hello. My name is John DeSoto. I'm a retarded -- I mean, retired council member but -- and most of you know I get chicken skin because my mom was Frenchy DeSoto, the creator of the Office of Hawaiian Affairs. She was 1the one that went down to Makua and showed us as we were kids. She would go down to Makua and lie down in front of the bulldozers, the Army tanks, and stuff like that to protest all the things that were happening up in the valley of Mauka from the -- the highway. . . . . But I get chicken skin. I heard everybody that came up before me that spoke, and I get really chicken skin because it means a lot. You know, and the</p>	Please see General Response.

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		<p>things that I've done all my life, you know, I've gone all over the world. I used to live in different countries. Czechoslovakia. I lived in Barcelona, racing dirt bikes, of course. But the dirt bikes is the one that gave me the opportunity to see and feel the spirits what's up Mauka. . . . Not just in Makua, but of course, I was talking to Steve up in -- in Kahuku, you know, and it's like really unreal because I took all the Hawaii burial councils. I'm with Makaha Hawaiian Civic Club, so we get the civic club groups together. And what everybody that came up before me that spoke, I can see, and I can feel what they're saying. That's true. . . . And what the -- the -- the dirt bikes have done for me, gave me the opportunity to go and see places and do things that not too many people have the opportunity and privilege of doing and seeing and feeling. When I take the Hawaii Burial Council, when I take the Hawaiian Civic Clubs, we walk --made it up to Kahuku because we ride dirt bikes up there. I show them the villages that the military had on -- on -- on -- in Hawaiian language, that nobody knew about. . . . So I would take them up there and sure enough, there were families that used to have people that used to live there in the areas. And I also go say all of to -- to the kupunas, my, my, come, you guys go to the -- to -- where the village, all the grass is growing. And they'll look at me and they'll shake their hand. . . . I go, why? He goes -- because -- he goes, because Mr. DeSoto, you're the one that come here all the time. You come and you go. You're not staying away or going mahaio like the military does. And I said, all right, okay. You know, so when they see me coming and the spirits know that I'm coming and I'm going. So that's what they felt. . . . But, you know, with the Hawaiian Civic Club, see, I'm talking like a chicken skin because everybody that came up before me, I can feel what they're saying and what it is. And the whole thing is, as I told at one time, the military, in Haleiwa, up Mauka side, there's an old Japanese airplane that crashed during World War II. They -- they didn't know that. It was up in there. And when I ride the dirt bikes, I get to see all different areas. I got to see the archeological sites that not too many people have the opportunity and privilege of</p>	

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		<p>doing, of experiencing. . . . So when I told the state and I told the military about the -- the Japanese airplane, they didn't know about it. But finally, they did, and, you know, it was like, I didn't want to take anybody else up there because I didn't want to see bones of people that was in the airplane that crashed and stuff like that. But what I really appreciate, and I wasn't thinking about coming up and speaking, but all those that came up before me and all those out there that feel, we know what we've gone through and we've been there, done that. . . . And I've gone to Kaho'olawe a lot with the Hawaiian Civic Clubs, and yeah, it's the -- the pico. It's almost like the pico of the Hawaiian Islands inside there. So we got to make sure that everybody work together. It's got to be a win/win situation. Mahalo.</p>	
Angelica Devers		End US military occupation on Oah'u, DONT RENEW THE LEASE	Please see General Response.
James Di Giambattista		<p>The State of Hawaii should meet its legal obligation under the Hawaiian Homelands Act by not renewing any of these leases to the US military. The State should divide the land among those native Hawaiians on the homelands waiting list, and provide that land to those beneficiaries on 99-year leases. Any land that remains after that exercise is completed could then be leased to the military, providing that its usage didn't conflict with the needs of nearby Hawaiian settlers in the homelands areas. James Di Giambattista, Ph.D.</p>	Please see General Response.
Alyce Dodge		<p>Aloha,                      As a kama'āina who loves Hawai'i and her people, I am firmly opposed to the Army's retention of any of the "State" lands at Mākua, Poamoho and Kahuku. The initial \$1 lease to the Army was an insulting action that resulted in massive destruction of the natural environment and of cultural sites, and caused hardship and heartbreak to the original inhabitants those lands. Now is the time to end this injustice and let the leases expire.                      Furthermore, the Army should be required to clean up the toxic mess it created. I'd like to see the huge military budget, funded by our tax dollars, applied towards the wellbeing of residents. This includes addressing the impacts of pollution, climate change, crime,</p>	Please see General Response.

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		<p>housing and food self sufficiency - all of which have been adversely impacted by the presence of the military in Hawaii.            Alyce Dodge</p>	
Vince Dodge		<p>Aloha Kakou!            The US Army has had intense and consistent use of Makua Valley for over 80 years. It is simply time for the US Army to fulfill its promise to the farmers and homesteaders they evicted in 1942 and return the Valley. The Army also needs to take full responsibility for the condition of the Valley and the tens of thousands of UXO that are littered all over the Valley. We need the Army to put up the money for the cleanup and restoration of Makua Valley. The Wai`anae community needs to do the cleanup and restoration work. This is our home. `Aina is family.            We must make a radical 180* shift from destruction, i.e. training and war, to restoration, justice and peace.            There has not been a single live round fired in Makua Valley for over 20 years. Obviously the Army no longer can justify keeping the Valley for training. In fact, the DOD announced in late November 2023 that they no longer needed Makua Valley for training now or in the future.            Now is the time to partner up, and clean up and restore Makua Valley.            Aloha Nui!            Vince Kana'i Dodge</p>	Please see General Response.
Thomas Kevin Dolan		<p>It is time to send the Army packing. They've been dangerous stewards of Hawai'i lands - no renewal!</p>	Please see General Response.
Kamele Donaldson		<p>O Waialua kai leo nui Ua lono ka uka o Lihue He wala Wahiwawa e Huli wale, huli wale I ka leo He leo no ke kai e O Waialua la'i eha e E ha ka malino lalo o Waialua. Aloha mai, o wau no Kamaleiopu'uwai. Mahalo. Aloha e ku'u lahui. So excited to be here with all of you. Unfortunate, though. Right? I'm here today as a Kanaka 'Oiwai and a Kiahiloco- a kumu in the ahupua'a of Kawailoa, in the Moku of Waialua. I hope that this is not a performative hearing or part of just making us feel heard, that anybody who is watching, whoever makes decisions, that you hear us, you hear our pain, you hear our</p>	Please see General Response.

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		<p>ancestors' pain, you feel our grief along with us. Yeah. That's the only way we make connection, is when we feel each other.· Okay? All of these testimonies contribute to a genealogy of resistance.· We have been here.· We have always been here.· We will forever be here. And I am in opposition of renewing these leases. And the following reasons are snippets of a poem I wrote after a really, really awful discussion with the military man. Your uniform flashes through my mind with the voices of my kūpuna, screaming and chanting. Your boots stomp through our streets.· Your eyes envisioned a takeover. Your lips feast on our bodies until you're satiated. Your tongues are daggers to my kanaka spirit. Your sonar disrupts our sea life.· Your artillery practice bullets through our mountainsides.· Your helicopter blades warp the air that my keiki learn in. Your waste pollutes the water systems I am responsible for maintaining. And we can feel the earth shake as your tanks shove dust down our throats. We've protested you, tears burning holes in our cheeks, watching as you desecrate our homes for a dollar a year. You have transformed Haumea's beautiful figure from lush forests to paved battle wounds, and singing birds to blaring horns.· Instead of loco i'a, we have battleships.· Instead of a thriving ecosystem, we have thriving militarism, illegal overthrow, and a treaty. Wait a second.· I think a treaty is an agreement to be willfully signed by both parties. But you put guns to our heads and illegally imprisoned our queen. So when I told you I won't date a military man, I was trying to tell you that my bones shake and my ancestors' blood bleed into the scars of our 'aina, that it is culturally and ancestrally traumatizing to have this sacred body in the hands of people who have to look up the definition for that word. Yet you give me the definition of "trauma," and your eyes brand red, white, and blue on my breast, while you hiss that you're different, and put your hand over your heart, and sing "The Star-Spangled Banner." So I tell you what it's like to be the sexually objectified product, crafted as a commodity for this chaotic and capitalistic community that feeds the militourism in Hawaii.· Your presence is harmful to us, our past elders, our future pua, our steadfast 'aina, our sacred</p>	

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		<p>creatures, and our connection to our people. So, a'ole military in our backyards, we are still here. We have always been here, and we are not going anywhere. And so, for the lahui, Hawaii loa, kū like kākou, kūpa'a me ka lokahi e, kū kala me ka wiwo'ole. Onipa'a kākou, onipa'a kakou, a lanakila na kini e, e ola, e ola, e ola na kini e.</p>	
Angie Donnelson		<p>I grew up in Makaha valley. I believe the land at Malia should be released from the lease agreement with the military and cleaned up and restored to natural and cultural practice use. Land is in short supply for native Hawaiian people, and the Waianae coast has a large number of native Hawaiians who have been removed from their cultural practices over time and through disconnection from their ancestral lands. The land should be released from lease and used to benefit the people of Hawaii even if only as a wildlife Nate reserve.</p>	Please see General Response.
Jessica dos Santos		<p>To Whom It May Concern,                      I am writing in strong support of the NO ACTION alternative in the Draft Environmental Impact Statement (EIS) for Army Training Land Retention at Kahuku Training Area (KTA), Kawailoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O'ahu. It is time for the United States Army to honor its original agreement to return these lands in their original condition and allow the leases on these lands to expire, facilitating their return, cleanup, and restoration. The Army has utilized these lands for over 80 years since World War II, causing significant environmental damage. The U.S. Military has a notorious history of grave environmental negligence in Hawai'i, exemplified by the avoidable poisoning of O'ahu's largest water aquifer with jet fuel and forever chemicals at Kapukaki. This negligence extends to the military's role as one of the largest consumers of fossil fuels and the largest contributor to greenhouse gas emissions, exacerbating climate change. With 34 superfund sites across Hawai'i left unremediated by the military, including Pohakuloa and Kaho'olawe, the military's track record raises serious concerns about its stewardship. The Army's chronic failure to properly manage and clean up its existing sites underscores the critical importance of not</p>	Please see General Response.



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		granting further land retention. Additionally, the Army has desecrated many Hawaiian burials, culturally significant sites and natural landscape	
Jessica dos Santos		These lands are also home to many endangered and threatened species like the <u>`apapane and `i`iwi birds</u> which are crucial elements needed for the health of our ecosystems.	Protected species at Kahuku, Poamoho, and Makua are discussed and analyzed in Section 3.3.5.1, 3.3.5.2, and 3.3.5.3, respectively.
Jessica dos Santos		It is imperative that the Army conducts a <u>comprehensive evaluation of each property's current condition, removing unexploded ordinance</u> and rehabilitating affected areas promptly.	<p>Section 3.6.1 and Appendix J have been revised to add the definition of operational ranges. Current management measures to mitigate potential impacts from hazardous substances and hazardous wastes are discussed in Section 3.6.5.</p> <p>Existing Conditions discussion in Section 3.6.5.3 provides the procedures in place at MMR for areas that contain or are likely to contain MEC. Text added to the Environmental Consequences discussion under Section 3.6.5.3 states that the Army conducts management activities to ensure that no materials, including debris, trash, and brass are left behind.</p> <p>Lease compliance actions and cleanup and restoration activities that would occur after lease expiration are discussed in Section 4.2.4.</p> <p>Section 3.4.5 discusses the Army's Cultural Resources program's existing management measures for KTA, Poamoho, and MMR, including the State-owned lands. Section 3.4.5.2 discusses why State-owned land at Poamoho have not been surveyed.</p>
Jessica dos Santos		In conclusion, I strongly advocate for the return of all Army-controlled lands at KTA, Poamoho, and MMR (the no action alternative). We must not expand the military presence on our islands but rather work to reduce it, emphasizing stewardship and	Section 2.1 has been revised to indicate that the Army would coordinate cleanup and restoration activities with the State of Hawai'i throughout the CERCLA process.

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		<p>sustainability for future generations. To be clear, the no action alternative must come with the Army fulfilling its responsibility to carry out comprehensive planning, execution, and funding for cleanup and restoration of returned lands. This effort must fully address cumulative environmental impacts including those of adjacent federal lands controlled by the military, reforestation needs, debris removal, thorough toxin and pollutant cleanup, and must include clear timelines and methods for remediation. It is essential to establish <u>robust enforcement mechanisms, such as regular progress reports, independent oversight, and community involvement in monitoring.</u> The state must hold the military accountable for all actions and cleanup costs, even after lease expirations. Most importantly, community voices must be central in transparent decision-making about the future use of these lands. Thank you for your consideration, Jessica dos Santos</p>	<p>Section 4.2.4 discusses the reasons why specific cleanup and restoration activities after lease expiration are not able to be determined at this time.</p>
Jessica dos Santos		<p>Aloha my name is Jessica dos Santos. As an educator, I had the privilege to access Mauka and one of my students asked, "How can the military look at this beautiful place and think it's a good idea to bomb it?" And I urged my students to envision how even more beautiful it must have been before the bombs exploded, before the fires raged, before the invasive species colonized, before the sacred water sources were desecrated. Imagine when the people lived in harmony with the `aina. But we are done imagining, we want action behind the apologies and it starts with the ending of these leases.</p>	<p>Please see General Response.</p>
Jessica dos Santos		<p>As a lifelong resident of Kahuku, I have been traumatized by the sounds of <u>machine guns popping off, helicopters flying right above our homes shaking the walls, and being woken up by bombs going off in Wahiawa</u></p>	<p>Monthly training advisories are published to alert the public and neighbors of upcoming training activities that are louder in nature and may be heard outside the military installation. In addition to these notifications, USAG-HI has established internal policies and standard operating procedures in an effort to minimize training noise and its impact on the community.</p> <p>The issue of noise and its effects on the neighbors of KTA are discussed in Section 3.8.5.1 of the EIS.</p>

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			<p>The EIS states that pilots and crew would continue to receive a briefing designed to minimize noise impacts on, and disruption to, local communities and neighborhoods as aircraft transit to and from KTA. Land retention could require further limitations associated with noise. Although this would be subject to negotiations, a possible result may be greater restrictions associated with noise than are currently required.</p> <p>To alert USAG-HI of a specific noise complaint, please call the Community Concern Line at (808) 787-1528 or send an email to <a href="mailto:usag.hawaii.comrel@army.mil">usag.hawaii.comrel@army.mil</a>.</p>
Jessica dos Santos		<p>My heart breaks because I know that the training you do here will be used to slaughter and destroy indigenous peoples and ecosystems world wide to line the pockets of greedy corporations and the military industrial complex who profit from war and sadistically glorify the genocide, war and violent occupation they do. I am in strong support of the NO ACTION alternative to land retention at Kahuku, Poamoho, and Makua. The U.S. Military has a shameful history of grave negligence in Hawai‘i. The poisoning of Kapukaki with jet fuel and forever chemicals is just one example. The U.S. military is one of the largest consumers of fossil fuels and the largest contributor to greenhouse gas emissions, exacerbating climate change and all of the residual catastrophes we are already suffering from. With 34 superfund sites across Hawai‘i left not fully remediated, the military's track record proves that it fails in stewardship and breaks its promises. On the other hand, the Kanaka Maoli have a 2,000 year track record of steadfast malama `aina. Therefore the stewarding of `aina should be under their ownership and their leadership. The no action alternative must come with the Army fulfilling its responsibility to fully fund and carry out the comprehensive cleanup and restoration of all lands they have desecrated no matter the costs. This effort must fully</p>	<p>Each resource area in Chapter 3 addresses cumulative impacts of the Proposed Action when combined with impacts from other reasonably foreseeable actions. The Proposed Action is retention of State-owned lands and there is no need to address impacts unrelated to the Proposed Action and cumulative impacts not relevant when combined with the Proposed Action. In other words, continued use of federally-owned training land is not part of the decision being made in the EIS.</p> <p>Section 3.6.6 states that the Army would follow applicable regulations to conduct cleanup and restoration activities for any potential MEC on any State-owned land not retained at the end of the current lease.</p>

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		<p>address all of the cumulative environmental, cultural and social impacts including those of adjacent so-called "federal lands" controlled by the military, all of which this EIS shamefully fails to do. No amount of expensive PR and propaganda can cover up the scars and open wounds of 131 years of illegal occupation. The world's largest imperial power with all its guns and bombs is not bigger than the love and aloha the people of this place have, and will continue to have forever, for this `aina and for each other. How many native birds have been killed in these 65 years on these lands? How many native plants have been killed in these 65 years on these lands? How many native insects have been killed in these 65 years on these lands? How many native trees have been killed in these 65 years on these lands? How many water sources such as springs, streams, aquifers and wells have been contaminated in these 65 years on these lands? How many square feet of land has been contaminated in these 65 years on these lands? What is the Army's intention to clean up all of these site. What amount of water and land has been deemed too contaminated to be used for agriculture? What amount of water and land has been deemed too contaminated to be used for housing? What amount of water and land has been deemed too contaminated to be used for human contact? What amount of water and land has been deemed too contaminated to be used for gathering? How long would it take to bring these lands back to their previous state and to a state of health without any toxins or pollutants? How much finding would it take to bring these lands back to their previous state and to a state of health without any toxins or pollutants? How many affordable homes and/or homes in general would open up in Hawai'i as a result of the loss of military personnel working for, with or on these lands. What is the Army's commitment to paying for and following through on completing the complete clean up of these lands even after the leases end? What compensation is the Army committed to paying to the native Hawaiian families and their descendants for forcibly removing them from their ancestral and rightful by law lands? To what extent will the Army involve the kanaka maoli in the</p>	

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		planning and execution of the clean up efforts for these lands? Does the Army intend on creating jobs for locals to work on the clean up efforts for these lands?	
Jessica dos Santos		What contaminants are present in the soil, water and air in these 65 years on these lands? Where can I find a list of all of the toxins and chemicals which have been released in these 65 years on these lands?	Analysis on hazardous substances and hazardous wastes, including mitigation measures to protect natural resources such as soil, water, and air, is presented in Section 3.6.
Jessica dos Santos		Does the Army intend of going above the minimum requirements to clean up these lands to be able to eliminate and and all contaminants, pollution, debris, toxins and UXO's?	As stated in the EIS, cleanup will be conducted in accordance with the applicable regulations and in accordance with the lease or otherwise negotiated with the state. The parameters for the lease compliance actions would be defined and determined after completion of this EIS.
Jessica dos Santos		Does the Army intend of still paying only \$1 per year if these leases are renewed?	Sections 2.4, 3.1.3, and 3.2, and Appendix G of the Final EIS have been revised to clarify the assumption that a new lease or arrangement for fee simple Federal ownership would be negotiated at no less than an equitable, fair market value with the State. Land retention negotiations, including compensation for use of the State-owned lands, would be initiated following completion of the NEPA/HEPA process.
Jessica Dos Santos		Aloha. My name is Jessica Dos Santos. As an educator, I had the privilege to access Makua. And one of my students asked: How can the military look at this beautiful place and think it's a good idea to bomb it? And I urge my students to envision how even more beautiful it must have been before the bombs exploded, before the fires raged, before the invasive species colonized, before the sacred water sources were desecrated. Imagine when the people lived in harmony with the aina. But we are done just imagining. We want action behind the apologies. And it starts with the ending of these leases. <u>As a lifelong resident of Kahuku, I have been traumatized by the sounds of machine guns popping off, helicopters flying right above our homes shaking the walls, and -- and being woken up by bombs going off in Wahiawa. When I go to the beach, I am greeted</u>	Section 2.1 of the EIS addresses lease compliance as well as cleanup and restoration activities.  The issue of noise and its effects on the neighbors of KTA are pilots and crew would continue to receive a briefing designed to minimize noise impacts on, and disruption to, local communities and neighborhoods as aircraft transit to and from KTA. Land retention could require further limitations associated with noise. Although this would be subject to negotiations, a possible result may be greater restrictions associated with noise than are currently required.

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		<p>with a sign that says that my son might encounter UXOs while he plays at Malaekahana. My heart breaks because I know that the training that you do here will be used to slaughter and destroy indigenous peoples and ecosystems worldwide to line the pockets of greedy corporations and the military industrial complex who profit from war and sadistically glorify the genocide and war and violent occupation they do. The genocide you are committing in Palestine is unconscionable. I am in strong support of the no-action alternative to land retention at Kahuku, Poamoho, and Makua. The U.S. military has a shameful history of grave negligence in Hawaii. The poisoning of Kapukaki with jet fuel and forever chemicals is just one example. The U.S. military is the largest contributor to greenhouse gas emissions, exacerbating climate change and all the residual catastrophes we are already suffering from. With 34 superfund sites across the Hawaiian archipelago left not remediated, the military's track record proves that it fails in stewardship and breaks its promises. On the other hand, Kanaka Maoli have a 2,000 year track record of steadfast malama aina. They, therefore, should be the stewarding of the aina, should be under ownership of them and their leadership. The no-action alternative must come with the army fulfilling its responsibility to fully fund and carry out the comprehensive cleanup and restoration of all lands they have desecrated, no matter the cost. This effort fully -- this effort must fully address all of the cumulative environmental, cultural, and social impacts, including of those adjacent so called federal lands controlled by the military, all of which the EIS shamefully fails to do. In closing, no amount of PR and propaganda can cover up the scars and open wounds of 131 years of illegal occupation. The world's largest imperial power, with all its guns and its bombs, is not bigger than the love and aloha the people of this place have and will continue to have forever for this aina and for each other. Mahalo.</p>	<p>Section 3.8.5.1 also states that monthly training advisories are published to alert the public and neighbors of upcoming training activities that are louder in nature and may be heard outside the military installation. In addition to these notifications, USAG-HI has established internal policies and standard operating procedures in an effort to minimize training noise and its impact on the community.</p> <p>To alert the U.S. Army Garrison Hawaii of a specific noise complaint, please call the Community Concern Line at (808) 787-1528 or send an email to usag.hawaii.comrel@army.mil.</p>
Fisipeau Drummondo		<p>Aloha. My name is Fisipeau Drummondo, and my daughter said last night: Mom, you know there a military meeting over there at Kahuku tomorrow night? And I was like nah, because we used to do</p>	<p>Please see General Response.</p>

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		<p>the -- we did the turbines, yeah. We stood up against the turbines, went down the rabbit hole, attended a legislative meeting. It was a joke, because nobody listened. Even though it's good and right, you guys don't listen. So, to me, I'm here not to sway you guys, because you guys already know what you guys going to do or did, I'm here as a witness to the Almighty, as a witness to him, because that's who my life I give to and honor. You guys don't have no power over anything. Not you guys, but the military and the spirit that it comes behind. Because it is a spiritual battle, you know, it's good against evil. So it's like, whose side you going to be on? That's the question we're going to ask ourselves tonight. Whose side are you on? So it's not against you guys as military. It's the spirit behind what you guys representing, and -- especially here in Hawaii and worldwide. So I'm going to read you guys a scripture. But I had a -- when they were doing the Mauna Kea, I am not a traditional Hawaiian. I'm Hawaiian-Tongan- Portuguese, and mind you, Black Portuguese. I don't know if you guys ever heard of Black Portuguese, the Negroes, Israelites. Yeah, God dropped that on me. Unbelievable. But he's so good. He cares for the little. He cares for me. So he showed me true. Nobody need show that, in my kai ea take care of me. So anyway, I asked him, like, because they were doing Mauna Kea, so I said -- I said: Father, if I joined the fight -- because I was happy for the Mauna Kea and the Hawaiians, I was like, yeah, go get them. And I was like: But if I joined that fight, because I wasn't a part of it, I said: What would I be fighting for? Because he knows my heart. I love him so much. I said: What would I be fighting for? You know what he said? The land. In his still, small voice, he told me: The land is what you're going to be fighting for. Guess what the motto of Hawaii is. Ua mau ke ea o ka aina i ka pono. The life of the land is perpetuated in righteousness. Not what the military say righteousness, what his words say righteousness, because that's the only true word that can give us life in this land is his true word. Other than that, all corruption. I tell you that if you guys not in God's word, you guys ain't got nothing. It ain't going to flourish. Let me tell you that right</p>	

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		<p>now. And I stand on the word of God. I've been chewed since 2020. My husband, he got sick. He got kidney failure. He had liver -- liver problems. I lost my 15 year job. My son passed away in 2021. I have six grandchildren that I take care of. But you know what? Still not going to leave him, because you know why? He the one take care of me no matter what it looks like. And even if you guys still occupying, no matter what it looks like, he's still in control. He the one who going to take care. I'll let you guys know that right now. Yeah. Let me see. So I'll read you guys the scripture. This -- and you know what? The scriptures is beautiful because he's so gracious and loving. Oh, my God, he's so gracious and loving, because I ain't perfect. I am part of the scum of the earth. But he look at me because I reached out to him. He loved me so much. And I love him so much in return. For these are rebellious people, deceitful children -- whoever's speaking to -- children, unwilling to listen to the Lord's instruction. They say to the seers: See no more visions, and to the prophets: Give us no more visions of what is right. Tell us pleasant things, prophesy illusions. Leave this way, get off this path, and stop confronting us with the Holy One of Israel. Therefore, this is what the Holy One of Israel says: Because you have rejected this message, relied on oppression, and depended on deceit, this sin will become to you like a high wall, cracked and bulging, that collapses suddenly, in an instant. It will break in pieces like pottery, shattered no -- so mercilessly that among the piece, not a fragment will be found for taking -- for taking coals from a hearth or scooping water out of a cistern. This is what the Sovereign Lord, the Holy One of Israel says: In repentance -- oh, how's -- how beautiful he is -- In repentance and rest is your salvation. Repent -- -- stop doing evil. In quietness and trust is your strength. And trust in what? Military, no. Most High. Huh? I am wrapping it up, sis. Why? You don't want to hear the word of God? What's up? [THE MODERATOR: But we have a lot of people, so -- ] Oh, my God. How many more people get after me? [THE MODERATOR: About 30.] 30, okay. But this one is good, okay? Let me finish. Let me finish. Because you know what? Not too many</p>	



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		<p>people are here talking about God, okay, so let me finish. Okay. In repentance and rest is your salvation. In quietness and trust is your strength, but you would not have none of it. You said: No, we will flee on horses. Therefore, you will flee. You said: We will ride on swift horses. Therefore, you -- your pursuers will be swift. A thousand will flee at the threat of one. At the threat of five, and you all flee away, you -- till you are left like a flagstaff on a mountaintop, like a banner on a hill. That's what you guys do, yeah, military. When you guys go take over the line, you guys pop you guys flags over there, claiming them, yeah. But look. That not going to matter. Yet, the Lord longs to be -- the Lord longs to be gracious to you. He's so beautiful, I'm telling you. I don't know why we're not all serving him, like, with all our hearts. He's so beautiful. Therefore, he will rise up to show you compassion. For the Lord is a God of justice. Blessed are all who wait for him. Hallelujah.</p>	
Camille Dudoit		I strongly oppose.	Please see General Response.
Kiana Rose Kuualoha Dulan		<p>Aloha o Kiana Rose Kuualoha Dulan ok'u inoa, no Kapolei mai au, no Keaukaha ko'u makuakane's 'ohana. That's where my dad's family is from. Also, from the Philippines. My mom is from the Philippines. My great, great, great, great grandpa is John Kalei Manuia, and he was a royal guard for Queen Liliu. And my dad is currently a foreign area officer for the DOD. I am an intern at an organic farm, and I'm also speaking against the military, because I hear so much artillery going on whenever I'm just harvesting, like, daikon and coastal star lettuce. And that doesn't make any sense. Anyways, some questions that I have. What amount of money is being given to the people on the Board of Land and Natural Resources, who are the accepting authority of this proposed action? Do your readiness and environmental protection and integration grants provide enough money to undo or offset the damage done by your training activities, or do they just justify your continued abuse and degradation of our 'aina? The National Environmental Protection Act requires that the federal government to use all practicable means to create and maintain conditions under which man and</p>	Please see General Response.

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		<p>nature can exist in productive harmony.· But what is harmony?· In Table 3.59 of the EIS, it says, "Continued loss of 'aina presents" -- hello?· Oh. Sorry. "Continued loss of 'aina represents a disproportionate and a long-term, significant, adverse impact on communities with environmental justice concerns." Do you know what "'aina" means?· "'Aina" refers to the reciprocal relationship that humans have with the land; not live fire training or maneuvering exercises.· After listening to just a fraction of the testimony, I got chicken skin or goosebumps, and was moved spiritually, and cannot imagine to continue the process of renewing these leases.· So my last question is, do you have a heart?· Mahalo.</p>	
Sadie Eckart Eckart		<p>Cease this lease!!!!                      No More.                      Cease the lease.</p>	Please see General Response.
Lani Eckart-Dodd		<p>I oppose this proposal. I think it will be best for the leases at all 3 locations be discontinued and the public land be used for recreational and cultural purposes or put into conservation.</p>	Please see General Response.
Ryan Edwards		<p>I firmly believe that when the military's lease is up that the military and the U.S. government should deoccupy Hawaii. From what I've seen the military has caused destruction across our islands and chaos. Our water systems alot of them have become damaged as well as cave systems. I believe that we are an Independent Nation and our Kingdom needs to be restored in order to bring "Pono" righteous to the Aina when can began to self-sustain once again to where we as a Nation can become Independent again. We as Native Hawaiians are entitled and deserve to have our Aina back in order to also reconnect with our culture and practices.</p>	Please see General Response.
Christopher Egbo		<p>I oppose the Army, Marine Corps and Hawaii National Guard proposing to renew leases from the state of Hawai'i on three parcels in Mākua (782 acres), Poamoho (4,390) and Kahuku (1,150 acres). The leases expire in 2029 and 100% of the lands up for renewal are stolen Hawaiian Kingdom lands. Thier presence has adversely affected Hawaii's food systems and sustainability. The heavy militarism in Hawai'i negatively impacts us all, and more</p>	Please see General Response.

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Pat Elder		<p>importantly deeply impacts ‘āina, and all natural resources. They have no place here on this island. The time is up. Give the land back.</p> <p>The Army is despicable, and the state of Hawaii is too. We should not allow the renewal of leases from the state of Hawai‘i on Mākua, Poamoho, and Kahuku. I tried to use the online option but the Army blocked me from accessing the site. It's how they roll. See Table 7-1 Groundwater PFOS, PFOA, PFBS, PFNA, and PFHxS Analytical Results USAEC PFAS Preliminary Assessment/Site Inspection Schofield Barracks and Kawaioloa-Poamoho Training Area, Hawaii <a href="https://aec.army.mil/application/files/3216/9869/6558/Schofield_P_FAS_PASI.pdf">https://aec.army.mil/application/files/3216/9869/6558/Schofield_P_FAS_PASI.pdf</a> The Army gives us results from one groundwater test that shows PFOS at .76 parts per trillion and PFOA at 4.7 ppt. Many bases on the mainland have published documentation showing contamination at more than a hundred wells. PFBS was reported at 1.4 ppt and PFHxS was found to have 15 ppt. The levels for PFOA and PFHxS exceed the EPA’s enforceable limit of 4 ppt for PFOA and 10 for PFHxS. The EPA ought to enforce this! We have bases across the country with groundwater totals greater than several million parts per trillion of PFOS and PFOA. The Hawaii Department of Health ought to demand an honest testing regime. Until this happens, the state shouldn’t renew the lease for the Kawaioloa-Poamoho Training Area. Regarding the leases of Mākua Military Reservation and Kahuku Military Reservation, please see my report, Army closes PFAS investigations at 8 bases in Hawaii claiming facilities are not contaminated - Evidence suggests otherwise. December 2, 2023 <a href="https://www.militarypoisons.org/latest-news/army-closes-pfas-investigations-at-8-bases-in-hawaii-claiming-facilities-are-not-contaminated">https://www.militarypoisons.org/latest-news/army-closes-pfas-investigations-at-8-bases-in-hawaii-claiming-facilities-are-not-contaminated</a> The Army says all future investigations and testing for PFAS have been called off at these two facilities. The Army is not being honest with the wonderful Hawaiian people about PFAS, while they’ve contaminated the Hawaiian landscape with the deadly carcinogens that last forever. The Army has demonstrated no intention to clean up anything. They have examined their spotty historical record and say they can’t verify the use of aqueous film-forming foam (AFFF) at these</p>	<p>Section 3.6.5 has been revised to discuss the purpose and conclusions of the Army Preliminary Assessment/Site Inspection (PA/SI), and explain that no further PFAS investigations at these installations were warranted.</p> <p>The groundwater analysis for Schofield Barracks is outside the scope of this EIS.</p>

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		<p>installations. The Army says historical documentation of PFAS use was not required “because PFAS were considered benign. Therefore, records were not typically kept by the facility or available during the Preliminary Assessment on the use of PFAS in training, firefighting, or other non-traditional activities, or on its disposition.” The Army is not telling us the truth. As far back as the 1970s, studies conducted by the Department of Defense showed that the firefighting foams containing PFAS used on military bases were toxic. Well-intentioned, yet unenforced congressional directives call for a thorough accounting of all uses of the toxins. The Army has been allowed to proceed with slipshod investigations of these facilities concentrating only on the use of PFAS in firefighting foams. They’ve only addressed 3 of the more than 15,000 PFAS compounds known to exist. They can also shirk their responsibilities because Hawaiian officials let them. In the 1970’s the Department of Defense began using AFFF to fight fuel fires at just about every military installation. Still, the Army claims Kahuku Training Area and Makua Military Reservation are the exceptions. The Army claims there are no available records to indicate firefighting foams were used, stored, or disposed of at Kahuku Training Area and Makua Military Reservation so they are not moving ahead to test these facilities for the presence of the toxins. The Army has brazenly used a template across the country to fill in blanks with lies. These same words are used at dozens of Army installations across the country to eliminate areas from further investigation, or to exit the CERCLA process altogether: “Documentation specific to AFFF may have been limited (e.g., each AFFF use, procurement records, documentation of AFFF used during crash responses or fire training activities) due to lack of recordkeeping requirements for the full timeline of common AFFF practices.” Because the Army claims it kept lousy records it will assume there was no use of PFAS to close the books on these facilities. This entire “investigative” charade avoids an examination of the use of PFAS in a host of military applications like wire coating, chrome plating, degreasing, and wash racks. Hawaii is poisoned by the Army and so are its living</p>	

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		<p>creatures. The Army is far behind the other military branches in addressing the threat to public health posed by its use of PFAS. Please read through my report. The Army must clean up the mess they've made and go away. Mahalo, Pat Elder  <a href="http://www.militarypoisons.org">www.militarypoisons.org</a></p>	
Pat Elder		<p>This is from Elizabeth Boyle of the National Academies of the Sciences. I can put you in touch with Elizabeth if you think you can make some sound recommendations. I know her from my work as a community liaison with NAS on PFAS. (Please don't respond to all and I'm sorry for the 2nd mass email in a few hours. - Pat                      Dear PFAS Liaisons, The National Academies is seeking suggestions for experts to participate in the new consensus study that will recommend clinical follow-up and care for those exposed to the November 2021 Jet Propellant 5 (JP-5) fuel leak at Joint Base Pearl Harbor-Hickam. The committee will collect information on the potential long-term health risks of exposure to JP-5 through the review of available scientific evidence. It will engage with impacted community members about the health impacts in their communities. Approximately 15 volunteer experts are needed to serve and make up the committee . Expertise in the following areas is desired: · Clinical practice guidance · Exposure science · Environmental epidemiology · Risk communication · Occupational and environmental medicine · Medical toxicology · Analytical chemistry · Environmental sociology · Bioethics · Primary care physicians who serve children and women of reproductive age                      Please submit nominations by September 5, 2024, 11:59 p.m. ET. For any additional questions regarding the roundtable, please view the project page or email my colleague [REDACTED] or me. On Thu, Aug 8, 2024 at 6:43 PM Pat Elder &lt;[REDACTED]&gt; wrote: The Army is despicable, and the state of Hawaii is too. We should not allow the renewal of leases from the state of Hawai'i on Mākuā, Poamoho, and Kahuku. I tried to use the online option but the Army blocked me from accessing the site. It's how they roll. See Table 7-1 Groundwater PFOS, PFOA, PFBS, PFNA, and PFHxS Analytical Results USAEC PFAS Preliminary Assessment/Site Inspection Schofield</p>	<p>Section 3.6.5 has been revised to discuss the purpose and conclusions of the Army Preliminary Assessment/Site Inspection (PA/SI), and explain that no further PFAS investigations at these installations were warranted.</p> <p>The groundwater analysis for Schofield Barracks is outside the scope of this EIS.</p>

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		<p>Barracks and Kawaioloa-Poamoho Training Area, Hawaii  <a href="https://aec.army.mil/application/files/3216/9869/6558/Schofield_P_FAS_PASI.pdf">https://aec.army.mil/application/files/3216/9869/6558/Schofield_P_FAS_PASI.pdf</a> The Army gives us results from one groundwater test that shows PFOS at .76 parts per trillion and PFOA at 4.7 ppt. Many bases on the mainland have published documentation showing contamination at more than a hundred wells. PFBS was reported at 1.4 ppt and PFHxS was found to have 15 ppt. The levels for PFOA and PFHxS exceed the EPA’s enforceable limit of 4 ppt for PFOA and 10 for PFHxS. The EPA ought to enforce this! We have bases across the country with groundwater totals greater than several million parts per trillion of PFOS and PFOA. The Hawaii Department of Health ought to demand an honest testing regime. Until this happens, the state shouldn’t renew the lease for the Kawaioloa-Poamoho Training Area. Regarding the leases of Mākua Military Reservation and Kahuku Military Reservation, please see my report, Army closes PFAS investigations at 8 bases in Hawaii claiming facilities are not contaminated - Evidence suggests otherwise. December 2, 2023 <a href="https://www.militarypoisons.org/latest-news/army-closes-pfas-investigations-at-8-bases-in-hawaii-claiming-facilities-are-not-contaminated">https://www.militarypoisons.org/latest-news/army-closes-pfas-investigations-at-8-bases-in-hawaii-claiming-facilities-are-not-contaminated</a> The Army says all future investigations and testing for PFAS have been called off at these two facilities. The Army is not being honest with the wonderful Hawaiian people about PFAS, while they’ve contaminated the Hawaiian landscape with the deadly carcinogens that last forever. The Army has demonstrated no intention to clean up anything. They have examined their spotty historical record and say they can’t verify the use of aqueous film-forming foam (AFFF) at these installations. The Army says historical documentation of PFAS use was not required “because PFAS were considered benign. Therefore, records were not typically kept by the facility or available during the Preliminary Assessment on the use of PFAS in training, firefighting, or other non-traditional activities, or on its disposition.” The Army is not telling us the truth. As far back as the 1970s, studies conducted by the Department of Defense showed that the firefighting foams containing PFAS used on military bases were</p>	

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Sweetheart Eleneki		I oppose.	Please see General Response.

Commenter	Submitted By	Comment	Response
Michael Eli		<p>Aloha -- aloha, brother. Every time I come to this board meeting, but my name Michael William Kapalino Eli. apuni o ko Hawaii pa aina), okay? . . . . I come to this board meet -- the board meeting every time and ask the military de-occupy archipelago aina, you got to, you guys got to go. We'd like the archipelago back. Not just here or there, we like the whole archipelago. The kingdom and the whole archipelago. The whole archipelago. Not just one -- one piece of Makua. . . . Want to get it from the state? The state don't even own them. You see all the owners, they're all over here, heirs and successors. We all heirs and successors over here. You know what I mean? We get the land title just like what they said. I go where you live. Where you live? Yeah? What land you own? So if I come over there take your land away from you, how would you feel? Yeah? Yeah. How would you feel? . . . . So it's been like 130 years. So you guys are still petrinating the crime from 1893 still yet. What is today? 2024, you guys still yet here occupying. You got to de-occupy. So once you guys de-occupy, you know, the state representatives and all them guys, if they like the American, they can go too with you guys. You know what I mean? Because I think so we can -- we -- we can do our own thing over here, you know what I mean? . . . . And, you know, right, there's no treaty, no land, no law because you guys no more treaties, so the state have no law. Listen to this again now, they say, what, 430,000 acres. So what you guys rent them dollar? \$1 for 430,000 acres or something? I keep on giving it to the military and saying, how much you guys lease the land from the state? What, dollar one acre or dollar 10,000 acres? I keep bring up to you guys, but I no get the -- the reaction at the board meeting, the answer. Because you guys just pass the buck every time your new guy come, or new guy come. . . . Every month your new -- what -- what, Steve? Yeah. So you represent the -- the Army, but you only pass the buck. After, what? You're going to go to Kahuku? All those lands got to give back and you guys got to clean them up, clean up your guys' rubbish, all your guys' bombs. Got to be pristine, like, how Schofield came when they were going to take over. Got to be</p>	Please see General Response.



Commenter	Submitted By	Comment	Response
		<p>pristine like that. Got to be clean where we can plant because that's what we all supposed to be doing.· We still be chasing money.· That's what we're doing right now. We chasing the money man.· The money don't nothing, you know? Because the inflation is mean. Wait -- wait -- wait. I got one more.· You guys still -- the war crime is still happening right now.· If it was kingdom, the head, you see the head right there, the kingdom, they cut off the head, you know? For real, in the public.· But aloha, everybody o kakou sorry.· Sorry for, but that's -- that's the kingdom rules, you know?· Aloha.</p>	
Mina Elison		<p>Aloha and mahalo for the opportunity to provide testimony in opposition of the lease renewal for the Army Training Land Retention.</p> <p>The presence of the U.S. Military im Hawai'i does not align with our Kānaka 'Oiwī values which prioritizes care and pono stewardship of our 'āina and people.</p> <p>Mahalo, Mina</p>	Please see General Response.
Malia Ellis		<p>I AM KANAKA MAOLI OF THE SOVEREIGN KINGDOM OF HAWAI'I.        I OPPOSE ANY AND ALL RENEWAL OF OUR HAWAIIAN LANDS THAT ARE NOT PRO-HAWAI'I.        I AM OPPOSED OF ANY MILITARY OCCUPATION WITHIN OUR ISLANDS &amp; THE PACIFIC.        HAWAI'I CONTINUES TO BE AN ILLEGALLY OCCUPIED TERRITORY.        PERIOD!        THE UNITED STATES OF AMERICA HAS SHOWN IT'S TRUE COLORS FOR IT'S DISREGARD OF INDIGENOUS PEOPLE &amp; OUR LANDS IN HAWAI'I.        STOP BOMBING OUR SACRED SPACES &amp; RETURN THEM TO THEIR TRUE CARETAKERS. THE NATIVE HAWAIIAN PEOPLE.        THE U.S. HAS OVER STAYED IT'S WELCOME. HERE &amp; ACROSS OUR ISLANDS OF HAWAI'I.        THE U.S. NEEDS TO RETURN, NOT TRADE, ALL HAWAIIAN LANDS NOW!        THE U.S. HAS BECOME NOTHING MORE THAN AN 'ELELU KEA!        A WHITE COCKROACH!!</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>WE CAN SEE RIGHT THROUGH YOU!!                      UA MAU KEA O KA ‘ĀINA I KA PONO!                      EA!</p>	
Joamar Foxx	Foxx Farms	<p>"I hope this message finds you well. I am writing on behalf of the residents of Kahuku to address our concerns regarding the recent and upcoming lease renewal to continue to conduct exercises conducted in our area.</p> <p>While we understand the importance of such exercises for the preparedness and effectiveness of our armed forces, the impact on our community has been significant. The noise, disruption, and safety concerns have been a source of stress and inconvenience for many residents. Additionally, the presence of military operations has raised concerns about the well-being of our local already endangered environment and wildlife.</p> <p>Given these issues, we kindly request that you consider relocating these training exercises to a less populated area where the impact on civilian life and the environment would be minimized. We believe that there are other suitable locations across the island where training could be conducted without causing undue hardship to our community, given the extensive land available for military use in Hawaii.</p> <p>We greatly appreciate the service and dedication of our military personnel and hope this request can be accommodated for the good of our community. "</p>	<p>Alternatives for relocation of training activities to other areas outside the O'ahu training areas with State-owned lands were considered but dismissed in Section 2.5 of the EIS because those alternatives did not meet the purpose and need for the Proposed Action.</p>
Rose Elovitz		<p>Hello. My name is Rose Elovitz. I'm a haole settler, and I stand in solidarity with the many kanaka who do not consent to the U.S. military's theft of crown lands and strongly oppose any lease renewal grants to the U.S. military, as you have demonstrated over the past 131 years that you are incapable of contributing to a healthy, safe, and secure environment for all beings who inhabit the land, waters, and skies of Hawaii. As the multiple kanaka kama'aina and your own EIS report have stated, your illegal and unwanted occupation here in Hawaii has detrimental consequences. It is also important to note that your EIS report is incomplete, as you have not only exploited and desecrated</p>	<p>Please see General Response.</p>

Commenter	Submitted By	Comment	Response
		<p>Hawaiian land and family structure through your war training, the actions taken place in Makua, Kahuku, Schofield, and all Hawaiian land the U.S. military has stolen has enabled you to export the same violence and destruction to Iraq, Vietnam, Palestine, Afghanistan, and all other places around the world where the U.S. Military seeks to bloody its hands for financial and political gain. For example, in 2003, members of Malama Makua found white phosphorus casings discarded in the sacred valley. This is the same white phosphorus being sent in aid packages to the Zionist entity called Israel, where it is deployed on civilian populations who are then choked and burned to death by this weaponry. For your environmental impact survey to honestly reflect the damage it inflicts upon the environment, every person killed, every child orphaned, every bomb dropped, every cultural site destroyed, every tree, plant, and animal incinerated as a result of the weapons testing here on Oahu by the U.S. military must be accounted for in this survey. Every military member, troop, battalion, etc. that was trained on these lands and then exported to fight in brutal wars to enact this harm globally needs to be incorporated in this EIS for it to be an honest and thorough display of the U.S. military’s intentions in Hawaii. By occupying Hawaiian land, not only do you force kanaka and the people of this aina to endure homelessness, poisoning, death, and grief for your own greed, you also exploit this land as a launchpad to inflict the same pain onto innocent civilians and communities around the world. You are no friend to the environment, and the only way you can begin to repent for all the pain and suffering you have caused is to return the land back to its rightful stewards and pay for a full and thorough cleanup of your mess. Free Hawaii and free Palestine. Thank you.</p>	
Jennifer Engle		<p>As a Hawai’i resident my whole life and someone who engages in cultural preservation and aloha ‘āina, I am saying NO to the renewal of any and all military lease renewals. I do not consent to it and have seen from fellow kama’āina as well as Native Hawaiians that the only people who want a renewal is the military itself. I do not support the move to renew the leases. Mahalo.</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
Lily Engle		<p>Aloha— As a kama’āina in Hawai’i, Uchinaanchu (Okinawan) woman, and supporter of Kānaka Maoli sovereignty I DO NOT consent to the renewal of military leases on the proposed land and STRONGLY OPPOSE all moves to continue the military’s tyrannical and unjust holding of them against the wishes of this lands indigenous people and all conscious and ‘āina-loving people in Hawai’i who recognize the United States military as a force of destruction across the Pacific. We will continue to resist the military occupation of Hawai’i and say NO as long as we can to efforts such as the lease renewal until the balance of the world is either restored by indigenous sovereignty or irreparably destroyed by militarism and land theft. Mahalo. Lily 96822</p>	Please see General Response.
Joy Lenuanani Enomoto		<p>My name is Joy Lenuanani Enomoto. I am the executive director of Hawaii Peace and Justice. I want to lean into justice a little bit. I can't believe the audacity of us having to provide testimony for you, when you all should be providing testimony to us. You are the ones who owe an explanation to the people of Hawaii for the years, the centuries of desecration you have brought going back to Schofield. I want you to think about how you all arrived in Lahaina, while everyone else got \$700 and you secured the area over our bones. I want you to think about how you fire into conservation zones of our birds, how you land in our aina, how you devastate us. You break our hearts. It's amazing to me that you can sleep at night. You have no right to be here. It is time for you to leave. And I think some part of you really knows that. The state had no right to give you anything for a dollar, because it is not a state. We are always and will forever be Hawaii. And we kanaka are not ever going to give up. I want you to know in the core of you that we are going to get our country back. We are going to get our country back. Whether it's before -- whether it is 2029 or 2040, we're going to be here. So when we talk about peace, we are the ones who have always kept us safe. We keep us safe. The U.S. has only created problems, devastation, and brought war to our aina. It is time to go. Mahalo.</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
Shannon Enos		I strongly OPPOSE the army's proposal to continue using our lands. Please deny their proposal. Mahalo.	Please see General Response.
Lennie Espinosa		Hello. My name is Lennie Espinosa, and I'm a community organizer, and actually an alumni of Leilehua High School, class of 2019. I thank everyone who came out to each hearing this week, and it's an honor to testify with you at my alma mater. Today I stand before you as a child of Turtle Island, allied to my Hawaiian siblings, and the child of a veteran. My dad is one of countless indigenous men who joined the military fresh out of school on the promises of security and stability. And my dad spent 20 years contributing to the displacement and exploitation of his and his siblings' lands. I have lived under the military shadow my whole life. I have seen the horrors your soldiers experience and the monstrosities you commit to the communities and lands you occupy. On these islands alone, you have unlawfully stolen Hawaiian Kingdom crown lands for war games. Your soldiers take housing away from local community, and your actions deplete natural resources, directly harming and -- harming endangered native species and polluting our airs and seas, lest we forget the 19,000 gallons of fuel that poisoned countless Oahu residents only years ago. For generations, you have tried to remove Hawaiians from these islands through violence, pollution, and displacement. I can stand here and use logic, morality, and even religion to argue with you why the renewal of these leases is wrong. From the poisoning of Hawaiians to the destruction of sacred and cultural sites, you use these lands to train. And for what? To train this battle that you created for yourself? I was told for years that my dad was protecting us. But the only thing he did was protect you from -- protect -- but the only thing he did was protect your colonial violence. We have heard countless reasons why you should not be on these lands, along with your claims of environmental consciousness, need for protection, and the like, which are nothing more than weak attempts to shield yourselves from the crimes you commit. We are tired of playing by the rules of your rigged game. We are tired of watching our lands be destroyed, and our children killed and displaced at your will. We	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>will not allow for the continuation of military occupation in Hawaii. The leases must end. The no-action alternative is the only option. This is not America. This will never be America. From Turtle island to Hawaii, get out.</p>	
<p>Karhane Espinosa Ramos</p>		<p>Aloha mai kakou. My name is Chevea Marciana Karhane Maina Aupo (phonetic) Espinosa Ramos. My ohana has been nourished for generations from the ahupua'a of Kahuku in the moku of Ko'olauloa in the Mokopuni of Oahu. I come before you today to share mana'o on the proposed renewal of the army's lease of state land, which are all actually crown lands. I am fifth generational iwi of this wahi of Kahuku and my kuleana is to ensure the next five generations of my ohana can know all of these wahi pana and have even more access than I and the generations before me had. The military has demonstrated that they do not have the capacity to care for these lands appropriately, and therefore, they should not be in charge of them. The lands have been mismanaged by the military for the sake of national security. They have been bombed, poisoned, and led astray from what these lands are supposed to be used for. This aina is at the top of our watershed, the top of our ahupua'a. We should be doing conservation efforts in these lands, doing reforestry, looking at agricultural opportunities. We as oiwi should be hunting these as part of our gathering rights. We should be gathering mea from these areas for our cultural practices, caring for the streams and springs. And most of all, Kanaka should have access to these lands to practice our traditional and customary rights, because there is no one better to take care of these lands than us. Traditional and customary rights of native tenants have been protected by law since Kingdom days and is still protected in our state constitution, Article 12, section 7. Military use of this aina infringes upon our rights as native tenants to access these land mauka to makai. My great-grandfather has been kept from accessing what should be our gathering lands. My grandmother has been kept from what should be our gathering lands. My father and my uncles were harassed when trying to access these gathering lands, even they were -- even when they were keiki on bikes. My</p>	<p>Please see General Response.</p>

Commenter	Submitted By	Comment	Response
		<p>eyes have never seen the top of our ahupua'a. I hope one day my keiki will get to experience my pana, for them to know the makani and the ua of Kahuku, to hear the stories of the maina haupu upena makers, whose nets fall in the kai like silk, and for them to experience them. I hope for them to run in the upper fields of Kahuku till the sun goes down. I hope -- I hope they get to know the aina the way I know it, to live in the same place for generations to come. Nohopapa. Mahalo.</p>	
Lennie Espinoza		<p>Comments Regarding U.S. Army Training Land Retention on O'ahu and the Army's Environmental Impact Statement As a military brat, I have spent much of my life on military property. From my first day of kindergarten, I was told that my dad was fighting for our rights as americans, as humans. I was told that my great grandfather crossed the border and served his new country for the love of freedom. I recited the pledge, said my prayers, and thanked god every day my daddy came home alive. Soon enough, thanks to the patient guidance of my ancestors, I came to realize that the words I spoke reflected nothing more than the whips used on my people generations ago. My dad is one of countless Indigenous men who joined the military fresh out of school. On the promises of security and stability, my dad spent 20 years contributing to the displacement and exploitation of his and his sibling's lands. I have lived under the military's shadow for 23 years. I have seen the horrors your soldiers experience, and the monstrosities you commit to the communities and lands you occupy. The pollution you bring-- from the poisoning of Hawaiians to the destruction of sacred and cultural sites, you do not care. You use these lands to train and for what? To fight this battle you created for yourselves? I was told for years that my dad was protecting us, but the only thing he did was protect your colonial efforts. For generations, you have tried to remove Hawaiians from these islands. Unlawfully stealing Hawaiian Kingdom Crown lands for war games. Your soldiers take housing away from the local community and your actions deplete natural resources, directly harming endangered native species and polluting our air and seas, lest we forget the 19,000 gallons of fuel that</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>poisoned countless O’ahu residents only years ago. For generations, you have tried to remove Hawaiians from these islands through violence, pollution, and displacement.. You do not wish to protect us, you wish to destroy us. I can sit here and use logic, morality, and even religion to argue with you that the renewal of these leases is wrong. How it will bring nothing but harm and death to Hawai’i and it’s people, but I know you do not care. We have heard countless reasons why you should not be on these lands, along with our claims of environmental consciousness, need for protection, and the like– which are nothing more than weak attempts to shield your complacency in the destruction of these islands and its people. We are tired of playing by the rules of your rigged game. We are tired of watching our lands be destroyed and our children killed and displaced at your will. You must let the leases end. This is not Amerikkka. This will never be Amerikkka</p>	
Damiana Espiritu		<p>I strongly feel the lease should not be renewed!! The Army admits to harming the land and environment in the Draft EIS. They admit there will be “significant adverse impacts” on land use (land tenure) and environmental justice with the retention of any lands at Kahuku, Poamoho, and Mākua. <b>The Army does not commit to clean up these lands until after the EIS is finalized, The lands in Mākua, Poamoho, and Kahuku are home to dozens of endangered organisms found nowhere else in the world. All of these issues are in violation of the Admissions Act (a federal law) which set aside these stolen lands to be held in a public trust for five purposes including the betterment of the conditions of native Hawaiians as defined in the Hawaiian Homes Commission Act, 1920.</b> For these reasons and many more these leases should not be renewed. Thank You for your consideration Damiana Espiritu</p>	<p>Section 3.6.5 revised to clarify that the entirety of the State-owned land enclosed by the fence east of Farrington Highway at MMR, 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. Until lease expiration, or designation of certain areas of the State-owned land as “closed ranges,” MEC on State-owned land at MMR will continue to be managed under the MMR SOPs.</p> <p>Section 3.2.4.1 discusses public trust lands, the events of 1893, and the Apology Resolution in 1993.</p> <p>The land tenure impacts in Land Use and</p>



Commenter	Submitted By	Comment	Response
			<p>Environmental Justice (Sections 3.2 and 3.12 of the EIS, respectively) acknowledge the lease price for the current leases. If leases would become the land retention method for the State-owned lands, the Army has stated that they would, in coordination with the State, provide a fair-market value for the leased State-owned land. The EIS has been revised in Sections 2.3, 3.1.3, and Appendix G 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>
Sofronio Estores		<p>Hello, I am submitting my input to the EIS with questions and requests that I would like to have as your response. I expect my submission to be entered into the record as my contribution to getting the land back after so many years of destructive usage by the US Army and the other Services occupying the Hawaiian Islands. Mahalo and Aloha My comments on the EIS – Army renewal of Training lands 5 AUGUST 2024 My comments in this process are as follows: 1. I object to the conduct of an EIS as being a Fraud, Waste and Abuse of the time, efforts and money of the people of Hawaii. A waste of our tax money. 2. No EIS was conducted when MAKUA MILITARY RESERVATION, KAHUKI TRAINING AREA, POAMOHO was established, therefore, an Environmental Assessment (EA) must first be done to determine if an EIS needs to happen (my understanding of the process). Assuming an EA was not done, then we are wasting our time, effort and money =therefore Fraud, Waste and Abuse by the US Military in conducting this process incorrectly. Given the complete objection of the Hawaiian people, there will be no renewal, therefore, this is, again a total waste. 3. The intended renewal includes the Pohakuloa Training Area on the Island of Hawaii, and there is no explanation why the entire land grab is not being addressed. Your attempt to separate the entire Military</p>	<p>Completing an EA before moving to an EIS analysis is not a requirement under HEPA or NEPA. Section 1.1 of the EIS has been revised to identify the HEPA and NEPA processes for bypassing an EA straight to an EIS-level analysis. Retention of State-owned land at PTA is addressed under a separate EIS because it is on a separate location with its own ROI, and is not connected to the State-owned lands on O’ahu.</p>

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		<p>Occupation’s impact on the Hawaiian Kingdom into smaller segments is a tactic to segregate the total so that the people will not be looking at the full impact, but only smaller footprints and their effects. This means multiple EAs, EIS and compounding the true size of the Fraud, Waste and Abuse by the US Military forces, combined. [...] The intent of these questions are: 1. Bring accountability to the people, not to the bureaucracy and leadership on Oahu. It is the people of Hawaii Island who need to be heard pertaining to their kuleana to malama their Aina, hopefully supported by all Islands. 2. Prepare carefully for the eventual release of MAKUA MILITARY RESERVATION, KAHUKI TRAINING AREA, POAMOHO lands to avoid the mistakes, the debacle of the return of Kahoolawe Island, the Waikane, Maunawili, Haleiwa airfield, and others to include Barber’s Point lands and facilities to the State of Hawaii, a sad testimony of how the Army and other US military Services treat the Hawaiian people of the Kingdom . The correct process is: Before an EIS is considered, an environmental assessment (EA) must be conducted to determine if an environmental impact statement is necessary, a feasibility assessment. There is no evidence of this action. So, the military elects to choose what it will do in compliance with NEPA and HEPA? Hawaii is in a new environment and era, that was not the case when the original executive order by President Lyndon B Johnson was announced in 1964 and the National Environmental Act (NEPA) was operationalized.</p>	
Sofronio Estores		<p>4. Hawaii is a sovereign, neutral Nation State in some strange form of military occupation, and no longer wishes to be complicit in America’s wars. 5. US President stated that the over-throw of the Hawaiian government was an “Act of War” – key statement in International Law. 6. Hawaii has been occupied since 1893. The US military, all Services, need to perform a graceful retrograde of its entire population, its war fighting apparatus after cleaning up the entire land and waters that have been damaged, destroyed, desecrated, ecologically disturbed and contaminated. 7. US claimed it was</p>	Please see General Response.

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		<p>necessary to have Hawaii (Pearl Harbor) in the Spanish-American War – which is over, a long time ago. It continually seeks to find, create incidents to cause adversaries anguish, concern and disgruntled. The era of saber rattling continues in the mindset of the American Empire. 8. US poured military forces on to the Hawaiian lands prior to WWII, during the war, and it continues extending into the Pacific. This war mongering attitude that America needs to be the police of this world at all costs for the sake of democracy has ignored the true danger of a Nuclear level of exchange with adversaries that have matched capabilities as never before. 9. In early 1942, when the residents of Makua were displaced from the land, there was a written promise that their land was to be returned six months after the conclusion of WWII. The residents wait. Most of those displaced have died and their descendants wait, now, over 80 years later, and they’re dying as well. Where is the honor, the truth, the restitution to these Hawaiian nationals? Broken promises have permeated the landscape. 10. The US Army used MAKUA MILITARY RESERVATION, KAHUKI TRAINING AREA, POAMOHO land to train for the Korean War, Vietnam War, Iraq War, Afghanistan War, War on Poverty, War on Drugs, War on Terrorism and continues, all in violation of Hawaii’s neutral state and treaties. 11. The US Military Forces, as occupying force, violates International Law by imposing American Domestic Law in Hawaii as opposed to Hawaiian Kingdom Law</p>	
Sofronio Estores		<p>12. The US Military has dumped hazardous waste off the coastline of the Hawaiian Islands indiscriminately that has contaminated the valuable coral beds and their habitat for the ocean resources of food for the Hawaiian people. 13. The US continues to misuse the resources of the Islands by conducting RIMPAC Exercises within our area of the vast Pacific further polluting, damaging or killing mammals of the sea with munitions, rockets, missiles, bombs, and sonar.</p>	<p>The impacts of hazardous waste management unrelated to the Proposed Action and RIMPAC exercises on the Hawaiian islands are outside the scope of this EIS. The Army continues to abide by the existing management measures described in Section 3.6.5, 3.10.5.1, 3.10.5.2, and 3.10.5.3. Where applicable and to the extent feasible, discussions of BMPs and standard operating procedures have been revised to include more detail.</p>

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Sofronio Estores		As stakeholders, we understand that you, as Occupier of our lands, limit access to military reservations, stations, posts, training areas, therefore, we are here to ask specific questions and make comments that relate to the claim that the US Army is a good steward of the land it occupies. During the remainder of the current Lease, only up till 2029, here are further questions: a. How much does it cost to operate MAKUA MILITARY RESERVATION, KAHUKI TRAINING AREA, POAMOHO. As we pay taxes, it is important to us to know how and where our taxes go. b. How many people does it take to operate MAKUA MILITARY RESERVATION, KAHUKI TRAINING AREA, POAMOHO? c. What are the pay grades of every person on the installation? d. What are the nationalities of the persons in each position? Are Hawaiians included and to what percentage? e. How and in what ways are you being a good steward, at each and all of those installations?	Please see General Response.
Sofronio Estores		f. Is there a current map that shows every archaeological, burial, sacred or protected site on MAKUA MILITARY RESERVATION, KAHUKI TRAINING AREA, POAMOHO? Are any sites marked on the ground? Have any been disturbed, damaged or destroyed?	Section 3.4 has been updated with Figures 3-14 and 3-15 to show the cultural resource survey coverage areas at KTA and MMR, respectively. Maps of specific sites and resources are not (and cannot be) provided in a public document to the extent that they are contrary to the requirements of the Archaeological Resources Protection Act which prohibits public disclosure of the nature and location of archaeological resources.  Revised sections 3.4.5.1 (KTA), 3.4.5.2, and 3.4.5.3 (MMR) describe why certain areas have not been surveyed. Figures showing where surveys have been completed and the general locations and types of sites within State-owned lands are provided in the Historic and Cultural Resources Literature Review (Appendix I).
Sofronio Estores		g. How are hazardous materials, including UXOs disposed of? [...] k. When was there a 100% survey of the impact area for depleted uranium? What were the results? l. There is technology available to	Appendix J, Section 3.6, describes regulatory framework the Army complies with for hazardous substances and hazardous wastes, including their

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		<p>track each round of artillery and large explosives on impact, thus, confirming detonation. If unexploded, the exact location of the projectile is known for removal or to be detonated in place by your EOD team. If not already available, why are you not developing this capability in order to comply with the Lease specification to clean up after each live-firing training exercise? The excuse that clean-up of any impact and training area after each exercise is not conducted because of UXO is not acceptable at the Makua Military Reservation, Kahuki Training Area, Poamoho Training Area. [...]</p> <p>n. What dust suppression measures are emplaced at every LZ site to eliminate or minimize the effects of the helicopters and especially the Osprey aircraft? There could be depleted uranium particles in the dust clouds in these flight operations.</p>	<p>disposal.</p> <p>Section 3.5.6.3 includes a summary of previous DU surveys which indicated no areas of potential concern on State-owned land at MMR.</p> <p>No live-fire training has ever been conducted at KTA or Poamoho, and live-fire training ceased at MMR in 2004.</p> <p>Section 3.6.2 and Appendix J have been revised to add a description of the Military Munitions Rule, the rule's applicability to MEC cleanup actions on the State-owned land, and the definition of operational ranges.</p> <p>Lease compliance actions and cleanup and restoration activities which would occur upon lease expiration are discussed in Section 4.2.4.</p> <p>Section 3.7.5 describes the Army's dust control measures.</p>
Sofronio Estores		<p>h. Do you have to surge your staff, equipment, supplies, POL or any support services on major exercises that include Allied Forces? If yes, from where do you get the augmentation staff and your procedures for hiring? [...]</p> <p>m. Do you keep a record of each instance when foreign troops or weapons are using the training area? The Lease stipulates usage of this land is for US Forces. Who negotiated, authorized, and gave you permission to allow foreign troops and weapons to be used at MAKUA MILITARY RESERVATION, KAHUKI TRAINING AREA, POAMOHO for training? These foreign nations are now accountable for their part in this destructive activities. This is another violation of the lease agreement and along with the other non-compliances constitute grounds to terminate the lease for cause at any time.</p>	<p>The leases do not indicate that use of the State-owned lands is limited to the U.S. military. Section 2.2.5.1 of the EIS states that other services including foreign allies occasionally use the training areas, under the oversight and responsibility of the Army.</p>

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Sofronio Estores		i. Is there any time in the year when there is no live-firing conducted? If yes, is access allowed for Native Hawaiians to enter the installation to conduct cultural activities? Why are you not removing unexploded ordnance during these down times instead of allowing hazards to accumulate over time? Are heavy metals being located, gathered and removed after each live fire exercise? History, again reminds us of how the US military treated the people of Hawaii when Kahoolawe was released from its terrible abuse and violent destruction.	Of the three subject State-owned land training areas on O’ahu, only MMR historically contained live-fire training activities, which were discontinued in 2004. Section 1.1.2.3 explains that the Army has determined that it will not pursue live-fire training at MMR. Sections 2.2.2.3 (KTA), 2.2.3.2 (Poamoho) and 2.2.4.3 (MMR) further describe the types of non-live-fire training activities conducted.
Sofronio Estores		j. Does the lessor, State of Hawaii (DLNR) monitor any activity on the installation such as earth moving, berm repairs, demolition, digging, or major construction involving new target structures and system components? Is there any plan to upgrade the infrastructure?	<p>Section 3.2.5 of the Final EIS has been updated to include information on State site visits and inspection reports of the lands leased to the Army. See Sections 1.1.3 , 3.2.5, and 3.6.5 for additional details.</p> <p>No new facilities or infrastructure construction is proposed at this time. The Army's preferred alternative moving forward is the No Action Alternative at MMR and Poamoho, under which no State-owned land would be retained. Any new infrastructure construction, including amounts and locations, on KTA is unknown at this time and subject to negotiations with the State that would commence after the ROD. As described in Section 2.5, future modernization would require separate, future NEPA analysis and compliance with other environmental laws within the State-owned lands.</p>
Sofronio Estores		o. What are your procedures for free access by native Hawaiian practitioners, family member visits to burial sites, hunters, and exercise cleanup monitors into MAKUA MILITARY RESERVATION, KAHUKI TRAINING AREA, POAMOHO TRAINING AREA?	KTA and Poamoho cultural access policies are guided by the 2018 NHPA Section 106 Programmatic Agreement. MMR cultural access policies are delineated by the 2001 Settlement Agreements and Stipulated Order, 2002 Appendix B 2008 Modification 1; and 2001 Settlement Agreement and Stipulated Order, 2018 Modification 2. These documents can be

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			<p>found on the O‘ahu ATR EIS website (<a href="https://home.army.mil/OahuEIS">https://home.army.mil/OahuEIS</a>) under the "Documents" tab.</p> <p>Please refer to the Army's cultural agreement documents on the USAG-HI website: <a href="https://home.army.mil/hawaii/garrison/dpw/cultural-resources">https://home.army.mil/hawaii/garrison/dpw/cultural-resources</a></p> <p>In addition to the Army's cultural access policies, access to KTA tract A-3 and Poamoho is managed by the State of Hawai'i, as discussed in Sections 3.5.5.1 and 3.5.5.2. At MMR, there is unlimited public access and cultural access on portions of the Makai Tract and South Ridge Tract including Kāneana Cave, Mākua Beach, and the land makai of the fence line east of Farrington Highway, as shown in Figure 2-3.</p>
Sofronio Estores		<p>As an interested participant, I want to have the following: a. Copy of the proposed renewal Lease Document. b. Pictures of the entire Pohakuloa training land, MAKUA MILITARY RESERVATION, KAHUKI TRAINING AREA, POAMOHO TRAINING AREA as they existed at the beginning of the lease. These images will define, describe their original state which is the standard to be applied for any and all land to be returned to the rightful owners and the Kingdom of Hawaii. c. Diagrams of the layout of the original installation-to review the historical progression of construction in the cantonment area. d. Additional diagrams of each major modification to the original documents up to the present (the total footprint). e. Location of each bivouac area to include ammunition points, fueling points, motor parks, field latrines, mess areas and trash disposal areas on the map. f. For each firing point, the type weapon, caliber, number of weapons, number of shells expended and target impact locations on the map. g. The same applies to aerial gunnery rockets, bombs and missiles impacted on the land. h. Each round fired has a</p>	<p>A new lease document has not yet been developed. A new lease agreement, if a lease is determined to be the land retention estate, with the State would be negotiated with the State, which would occur following completion of the EIS and ROD.</p> <p>The Army's 2024 Integrated Wildfire Management Plan for O‘ahu training areas and Environmental Condition of Property reports documenting past use of the State-owned land can be found through the O‘ahu ATR EIS website (<a href="https://home.army.mil/hawaii/OahuEIS">https://home.army.mil/hawaii/OahuEIS</a>) under the "Documents" tab. Data on past use of weapons and shells is not available. To request other documents, the Army FOIA Library and FOIA Request process are available at:</p>

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		<p>potential for wild fires, what is your wild fire plan? i. I would like to have a document outlining every expenditure where steward of the land is conducted to include the 5 W’s, who, what, when, where, why.</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>.  Please see General Response.</p>
Sofronio Estores		<p>Current knowledge of the true history of Hawaii as an independent, neutral state among the international community of national states back in 1843 presents information that now questions the presence of United States forces as occupiers of the Kingdom of Hawaii. Additionally, it is a fact that Hawaii was never annexed by the United States. Therefore, the Kingdom of Hawaii as a sovereign state, although not currently governing its own country, continues to exist as equals among all the International States. Given that this truth is now common knowledge among the people of Hawaii it constitutes a different environment as that was when Pohakuloa was established as a United States training area. Hawaii, as a sovereign nation, declared its neutrality within the international order of communities. This neutrality does not allow Hawaii to provide any assistance to belligerents in any war. America is a belligerent in a never-ending war(s) all over this planet and is violating International law which prohibits belligerent nations forces engaged in war to enter into a neutral state territory without disarming, and with permission, of course When New Zealand refused to allow any Nuclear powered vessel in its ports/harbors, the United States Military, with the State of Hawaii’s illegal government took measures to not allow a New Zealand warship to berth in Pearl Harbor and ended spending the entire RIMPAC in Honolulu Harbor. The United States has violated international law since the overthrow in 1893. It continues to avoid establishing a military governing entity as required. With this current knowledge of the true history of the overthrow, any further action by the United States military forces in Hawaii, if not formally requested and approved by the Kingdom of Hawaii government places the current Hawaii State government in complicit with this violation. There has been no formal request nor negotiation with the Hawaiian Kingdom to continue having the presence of United States</p>	<p>Please see General Response.</p>



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		<p>forces in Hawaii which, if done, would continue violation of international law. It is paramount that the United States military forces as well as the State of Hawaii governing entity understand the full ramifications of this violation. The improving awareness and knowledge of the Hawaiian people are now to be respected so that appropriate de-occupation of the sovereign Kingdom of Hawaii takes place with grace, pono and aloha. Given all that is presented above, I respectfully request the following: 1. The lease renewal not be approved beyond 2029. 2. My comments be entered into the public record. 3. The US Army uses the remaining years in the lease to begin preparing the land to be returned to its original state for turnover to the Hawaiian Kingdom government and its people. 4. The State of Hawaii takes the position not to renew the lease beyond 2029. 5. Acknowledgement to all of the above and a formal response to my requests. SOFRONIO J. ESTORES KUPUNA, US Army, Lieutenant Colonel (Retired)</p>	
Anela Evans		<p>I strongly oppose any and all military use of land in Hawai'i. The state of Hawai'i should not allow the military to retain any leases on Hawaiian land, especially lands used for live ordnance training.</p>	<p>Please see General Response.</p>
Patricia Fallbeck		<p>Military leases on Hawaiian lands are outdated. They were established decades ago when military strategies, training, and equipment were far different than they are today. The land should be returned to the people for agricultural, recreational, and cultural uses.</p>	<p>Please see General Response.</p>
Kekai Pua Farquhar		<p>Aloha again. My name is Kekai Pua. I'm with Polynesian Built Music, and often. It's nice. But we are a military family. My mom is born and raised on Lanai. Then she went over -- they moved when she was in elementary, to Aliamanu, where they have -- here they found iwi kupuna in their backyard. And that was blessed several times. And that's still -- like, Aliamanu -- these two books -- this is two out of three books that are very important to Polynesians. This is the land. This is, like, the Mahale book, with everyone's name. This is in the area of Ko'olauloa and Ko'olaupoko, which is this area, from Kaneohe side until -- Waianae is actually under one title, under Kauikeaouli under crown lands. And this is the boundaries.</p>	<p>Please see General Response.</p>

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		<p>That's the maps. These are the heirs here, a lot of them that have spoken. I hope you've been listening, because even, like, Uncle William Isla, who is my parents' cousin, when he was on DLNR and stuff, people were like, "Rah, rah, rah," against him all the way through. But Kali Watson is worse than Isla ever will be. And, like, if you know -- if you talk to him on a personal level, like, he's willing to work with you guys. At this point in technology, like, I can go on my phone. I can make an outfit. I can make a whole world on the metaverse, with weapons and everything. And my brother, my youngest brother, is an Army vet. My -- my biological father is an air force vet. Hui! Like, if you're going to be up there, you should pay attention to the people that are talking, especially if you're not a military, like, family, too. And, like, it's very important. My mom went over from the plantation fields, where she had nothing, where they had to go from -- the Kahu iki have to go -- yeah -- had to go from There's only, like, a few people after me too. And I'm just, like, reiterating what the Kūpuna and kia'i have said from the front lines, because a lot of them have been with us since Kahuku, since the turbines. So the 5G technology, that's so, like -- guns are obsolete. And I've been shot before, when I was in my 20s, with somebody that was on chemicals. So I'm just -- like, that is still what our soldiers are affected by. It's the Roundup pesticides that are in the ground that they're still pulling up the lines from. And our soldiers, like, they don't come back the same. Like, if you have a soldier, then you should know that they need to be taken care of. Like, my brother has PTSD, and he was in blasts there from the IED. So that's important. The effects of gun violence and everything is very important, like you just said. I don't like speaking. I like filming. And I like to swear because I'm someone -- but -- and if I don't like you, I won't -- I won't be, like, allying with you. But it's important for you to align with the people here, because that's the people that have ties to this land that we're on. And that's the whole point of this, you know? Like, if you're -- you could be using drones or virtual technology instead of weapons that the kupuna -- like, Uncle Sparky and Uncle Vince Dodge, they are down the street. We grew</p>	

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		<p>up with them, fighting for Makua. So for them to have to finally get it back, that's important to us. So all these lands have the same title. These are the heirs that you should talk to -- You should say yours.</p>	
Kekaipua Farquhar		<p>My name is Kekaipua. We are a military family, so I'm just like this is how they were saying that this is, like, we're teetering on both sides kind of thing. But well it has, like, military perspective. I work with that brand, so I know, and I make clothes and I also make lā'au ointments for the kupuna that are on Mauna Kea. . . . So I'm just like we all know that you don't have jurisdiction for the land because it's crown lands. And that belongs to Kolekole. On Friday they have a Kolekole crew who is doing --you're all welcome to invite -- to come to LCC in Waianae. . . . I'm 44 years old and my brother is an Army vet. So we did pray through Iraq and Iran and Afghanistan for all my brothers and my nephews in different branches for them to come home, like, left alone on the streets and have to, like, you got Agent Orange, pesticides in the excavator. . . . The toxin that's up here that's digging on our valley, Makua and Waimea Valley and burning, but he is, like, claiming imminent domain by Waianae with a AR-15 and already killed somebody. So I'm like we have to deal with that and desecration of our land. . . . And this mountain right here is training grounds for the a'ali'i and makaha, actually, all of Oahu is under Kolekole and Liloa, who we go up to, so I can go to or Samoa with Hawaiian with genealogy to the 500 A.D., so this is very fun for me. . . . And -- and Pearl Harbor, especially as kupa land, which is my grandmother who is Samoan and Mauti and Hawaiian from Valley which is sacred. Also, that's all the -- so the same person that was burning in Maui is also doing laps up here. . . . So Pearl Harbor is kuleana land. That's 52 acres for our family. So once we claim it, that becomes solidified as an affidavit and then you can go to court and then you have to pay us for your lease, so that's always fun. But I really hope that you listen to all the kupunas and everybody that was talking through this because we're, like, mild compared to Kahuku, which is tomorrow night. Which is really -- they're like -- we've all stood, all of us have</p>	Please see General Response.

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		<p>stood for five years even before COVID to protect the aina. So, like, any other desecration you have all of us and more behind us because we all film it on all platforms. So I hope you consider everybody's, you know, information.</p>	
Kaleohano Farrant		<p>I strongly support the No Action Alternative. I have been raised my entire life in Paumalu, and I work at a farm in Waialeale, both of which are ma kai of the Kahuku Training Area. For many years now, I have had serious concerns about the impacts of activities at the KTA in relation to noise pollution, invasive species proliferation, hazardous waste, litter, runoff, and more. Those concerns will persist due to the continued use of federal lands for training, but the end of the State leases will be a step towards reducing the harms caused by military training in this area and other parts of Oahu. The Army will justify its use of these lands for the purposes of national security, as they have always justified their claim and retention of lands throughout Hawaii, the US, and the world. The Army's reasoning is completely unsatisfactory to me in the context of their historic mismanagement of land and resources in Hawaii and beyond as well as their historic and ongoing use of resources in ways that cause significant physical and emotional harm to people in Hawaii and around the world. As a Native Hawaiian, I recognize the Army's use of these lands as a painful extension of colonial, patriarchal, and capitalist legacies of US imperialism in Hawaii and the Pacific. The No Action Alternative will not resolve these immense, long-standing issues, but it is the only acceptable alternative and will hopefully lead to further reparation of the damages that continue to be inflicted by the Army in Hawaii.</p>	Please see General Response.
Cori Farrow		<p>Aloha,                      As someone who lives here and cares about Hawai'i, I am firmly, firmly against the military owning or leasing any land here, especially for the absurd amount that they are allowed to lease it for. People, hardworking people, especially Hawaiians cannot afford their rent for a decent home, cannot own a decent home. This is a massive failure and we should all be ashamed of it. The militarization of the Pacific has brought desecration for decades all</p>	Please see General Response.

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		<p>over. It is time to put an end to it. The land needs stewards, caretakers, not people and institutions who bomb it and destroy it relentlessly. Our ecosystem, especially in Hawai'i is delicate. It needs care and attention before it is too late for all of us and we lose things completely. Native Hawaiians know and do this. They deserve access and ownership over their land. I do not support any move, bill, or politician, who supports more land power for the U.S. Military.</p>	
Bernadette Fernandez		<p>Aloha. My name is Bernadette. And five minutes before this meeting is start that's how I found out that was having this meeting. Yeah? Unreal. . . . I'm descendant of Helenihi, Na'ena'e and Kauakahi. My great-great-great-great grandparents, they're buried in that little piece of graveyard over there. And I can't even access, and you know what is sad? That half of you guys in this room, maybe all of you guys, went up that valley before me. I cannot even get to see inside there. Only from the road, which is -- oh, I can't even talk right now, so mad. . . . I wasn't -- I'm not -- I wasn't -- I never have a choice growing up. My generation we got stuck with everything. Everything we got stuck with. We got locked out of our olelo, our language. We got locked out of going to school. Yeah? Kamehameha. How many guys went to Kamehameha school? Yeah, look. One person in this room went to Kamehameha school from this side of the island. That sucks! No, for real. And then to find out five minutes before the meeting start that you're meeting like this. . . . I was left in the fucking dark. Talk about cut off the head. I'm a fisherman too. Give my family back their land because we not going to let you guys rent one dollar a year. Rent me a house for \$1 dollar a year because I live on a fucking beach. Yeah? How about that? . . . How about my son, like, live in his house too for \$1 a year? He get koko blood for two sides of his family. Yeah? His last name Mahuka. That's where my baby come from. My kids get cocoa blood. . . . Give us back our land because we not going to let you guys rent any more. That's my -- my tutu was born in that valley. For you guys desecrating that when my grandparents is right in the graveyard that I cannot even</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>access because it's frickin' locked.· Huh!· . . . Growing up -- I was just talking to my classmate.· Yeah· Growing up we heard the bombs. Try sleep, got to go to school the next morning with bombing coming over that mountain.· Wake up, walk to school, ashes falling on your head.· Yeah.· That's the kind of shit we remember.· You guys didn't stop bombing way long time ago, what, 21 years ago? Should have been before that.· You guys should have been out of there a long time ago.· . . . Clean up the land.· Yeah.· No.· Cousin said it, we going to clean up the land because that's our kuleana, yeah, for maintain, perpetuate, carry on, teach the younger generations to do. . . . I am just so grateful that my tutu, my tutu lady teach me what I know today.· My tutu man teach me what I know today, and that shit can't be learned from a book.· None of that can be learned from a book. . . . But today you can go back to school, you can learn.· Because two semesters ago I found about this damn lease, and I was not happy.· huff· But anyway, I am not in agreeance for your ordinance, and I would like to know how long this damn thing was out because it says from June something to something, something, something on a piece of paper that we have to turn in some comments. . . . This is my comment, no, we're not letting you lease any more land.</p>	
Keli'i Fisher		<p>Aloha,                      Please go forward with the No Action Alternative for the Army to retain none of these state-owned lands after the leases expire in 2029. The Army clearly does not need these lands anymore, whereas Native Hawaiians and locals would benefit greatly from more community-based projects with the state. The military/Federal government already controls so many lands here in Hawai'i - please take the No Action Alternative.                      Thank you for considering my testimony,                      Keli'i Fisher                      Hale'iwa, Hawai'i</p>	Please see General Response.
Lei Fisher		<p>Aloha mai kakou,                      I strongly support the No Action Alternative for the Army to retain none of these state-owned lands after the lease expiration in 2029.</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>The Army has shown that they do not have great need for these lands anymore. After the leases expire, the Army should restore the lands to (at minimum) their previous condition, if not better, and then the state should prioritize community-based management of these lands with and by Native Hawaiian and local communities. Mahalo nui loa for considering my testimony, Lei Fisher; Hale'iwa, Hawai'i</p>	
Ernie Foster		<p>My name is Ernie Foster. I'm a descendant of the (inaudible) ancestors. We are the family that refused Kamehameha to be part of the na opio opio class that existed in (inaudible) during that time. We need to understand that tonight's meeting is really a farce, because the government of Hawaii and the military has already signed a lease, yet they want to have this public hearing to appease the public to thinking that they have a voice of what's gonna happen in the future. We need to understand the real history of Hawaii and what really had occurred. From the beginning when Hawaii became a territory of the United States, the military was a strong arm of the sugar and the pineapple corporations at that time. When Queen Lili'uokalani was overthrown by Stanford B. Dole and the plantation owners at that time, the military were the bullies that took over the land from the people of Hawaii. And we need to understand that process from that time and that's (inaudible) today. Corporate America and the U.S. military, they (inaudible) the people of Hawaii for becoming puppets of the American government. We need to understand that clearly. Because when we see our brothers and sisters going into the military and coming back being mean from the wars that they were very involved in from Vietnam, from World War I, World War II, and all those times in the (inaudible) war that occurred during that time. Yet even to today, we have our sisters and brothers going into the military and coming back not being represented well by the veterans administration. And you can talk to these veterans, and they'll let you know clearly what has happened in the military and what they have not done for the people of Hawaii. The confiscation of the prime agricultural lands has occurred because</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>the military is taking some of the most primary lands in -- here in Oahu and also in the neighbor islands, as well. And we need to understand that process again to knowing clearly why we're fighting against this kind of military process that they think we should follow. Hawaii was a sacred place at one time. The people themselves were sacred as it was, much more than we believe what they were even to today, and we need to understand that whole process. Schofield Barracks and Kolekole Pass, this was prime lands that the Hawaiians used, Ewa Plains and definitely what happened during those times of the (inaudible) ahupua'a. Many of the Hawaiian villages in the (inaudible) were destroyed by the military, and we need to understand that clearly. Why are we fighting against this kind of misleading measures by the military? We should not be fooled by what is going on, even with the American -- or should I say the corporate media saying that they're doing us a favor, that we all know clearly, and the majority of us in this room knows clearly (inaudible). The destruction of the plants and the herbs that existed Makua Valley and Oahu Valley, you need to understand what happened during those times. The people of this land that existed before the military took over, it was such a beautiful place to live in that we don't even see that from our times. And we have to back into history to really understand what was going on. We cannot let the American press to suppress the history and the reality and the real truth of what happened in our history. I say this to everyone here, that it is our responsibility to find out what really happened. Because if you do find out what really gonna happen, you'll be just as angry as I am right now, knowing that we should organize among the people to fight against this kind of misleading leadership that we are having here in the Hawaii (inaudible). So it's really, really important to understand clearly that these folks up here are just part of the military. They don't care about the real existence of the Hawaiian people and their culture. We look at Pokai Bay and what has happened in Waianae there. They destroyed the bay because the Army Corps of Engineers went there to build that seawall. And yet the seawall</p>	



Commenter	Submitted By	Comment	Response
		<p>today is not effective in any way whatsoever, and it's not safe. Even before they built that wall, the kupunas and the natives of Hawaii and the Makua area told them it's not going to work. You think the military was gonna listen to them like they think they're gonna listen to us today? No. We need to understand clearly -- clearly -- don't give up the fight that you have in recognizing our important Hawaiian culture and its history being so significant. And for our youngsters and our generations who follow us, they will carry on the fire and the torch to make sure that they -- they themselves will continue to make sure that in many ways that we can get the military out of here. Barbers Point and the contaminated waters in Barbers Point and its existence that's going on right now, we need to understand clearly that that land and that area was so precious of a place that people live in Hawaii. Yet, we look at today's times here, even in Kahuku, up on the hillsides, we got these military maneuvers going on that is destroying the herbs and the botanical enrichment which exists here, right here in our own land. If you think the military cares about it? No way. So we really should think about what's going on. Kaho'olawe was destroyed. Our sisters and brothers today are being sent out to fight the rich man's wars. And I say the rich man's wars, because that's why we're out there to fight for the corporations to continue to exploit and oppress the people that they happen to be occupying of these lands, like they did to the Hawaiians, as well. Last but not least, what is going on right now in the Red Hill tanks and knowing that the navy continues to lie about what happened in these situations, and yet they're coming out with these so called studies saying that, oh, don't worry, the water's fine. But the Board of Water Supply is coming out with their own surveys, their own investigations, and they know clearly what's going on with these aquifers. So we need to understand even more to go among the people, organize among ourselves, organize those that's out there that don't know what's going on. Is there anyone here? Power to the people.</p>	
Kameron Freitas		I oppose.	Please see General Response.

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Shelley Fritz		<p>Aloha,</p> <p>I witnessed the 3 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 cease and desist your pursuit of your illegitimate leases.</p> <p>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.</p> <p>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.</p> <p>My ancestors, their lives, sacrifices, and the sacred words on which the United State 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.</p> <p>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 engenders.</p> <p>Mahalo</p>	Please see General Response.
Candace Fujikane		<p>Aloha mai kakou. My name is Candace Fujikane. I'm an English professor at the University of Hawaii. And I'm here to call for no extension of military leases on Oahu or anywhere in Hawaii. During the scoping period for this EIS, members of the public identified Alternative 9, no retention and move all Makua military reserve training elsewhere. What happened? The military decided that it didn't serve its purposes and so that public input was dismissed, erased. Yeah. So if that happens there, I wonder what happens to all this powerful testimony. We know that these scoping sessions are part of your fulfillment of the National Environmental Policy Act and the Hawaii Environmental Policy Act, that you have to do these scoping meetings. But it's all a farce. As someone said earlier, it's</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>all a farce. Now, when you actually read the 2,000 pages of the environmental impact statement, it sounds very much like the EIS for the 30-meter telescope. And so many of us stood against that. Yeah. And why is that? It's because it's become an industry to produce these mass environmental impact statements. Basically, what they say is: Oh, hazardous waste materials, we won't have a problem with that, because we will follow federal regulations. That has nothing to do -- the federal regulations have nothing to do with preventing the actual hazardous materials being dispersed, the pollution of the water. Just because you follow the regulations for the Clean Water Act doesn't mean that you keep the water clean. And so what it is, is that it's a -- if I, as an English professor, I have read the environmental impact statement, 2,000 pages, I would give it an F, because there is no evidence in there. There is no evidence in there. There's no substantive information about what you are actually going to do to prevent the harms that we know are going to happen. The environmental impact statement actually says that new long term significant adverse impacts will occur. The only alternative that won't have such impacts is an Alternative 9, which would have beneficial impacts for the land and the environment. So we know it's a farce, yeah. And those -- I mean, it's just amazing how you can fill 2,000 pages with nothing. It's basically just listing what are the endangered species, what are the risks. But there is no concrete plan on how to address them, because you have no plan for addressing them. So again, return the lands, let the lands heal. We are facing a dire future. You see the wildfires across the United States. You see the heat dome. We are going down. But let me tell you, the demise of capitalism is leading to the renewal of indigenous economies of abundance. Kanaka Maoli will survive what the military cannot. So thank you very much.</p>	
Candace Fujikane		<p>Aloha Kakou. My name is Candace Fujikane. I'm a English professor at the University of Hawaii and I speak directly to you, Colonel Steve McGunegle. I speak to you so that you can hear all of this powerful testimony as a human being. . . . . The highest ethical</p>	Please see General Response.

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		<p>imperative in life is to do no harm.· Everyone in this room has been negatively impacted, has been harmed by the presence of the military in Hawaii.· Psychologically, intellectually, spiritually, physically, all of those ways.· So I call for the end of the leases. . . . .</p> <p>· Now, there was an alternative number 9 on the EIS and that would have led to the end of the lease and the military leaving, and it says, "for some other place."· I don't want them to go some other place.· I just want them to leave.· It is so important for the health and the survival of everyone in this time of climate change that the military exacerbates the conditions of. . . . . So when you look at the summary of environmental impacts on table ES-3, we see that alternatives 1, 2, and 3 all result in, "New long-term significant adverse impacts will occur unequivocally."· They're just saying that's going to happen.· It's not a question. . . . . "Associated with military use of the land in the conservation district, which is not in allowable use under HAR Chapter 13-5."· It also clearly states that the military is not an acceptable use on conservation land.· So the United States is, in effect, breaking its own laws if it extends the lease to the military. . . . . Environmental law has two purposes.· One is to protect what is left and two, to repair what is damaged.· And that is what we want.· We want the land restored.· We want the land to be able to heal, so that the people can heal.· Thank you.</p>	
Ulise Funaki		<p>Aloha mai kakou. My name is Ulise Funaki. I am a kupa and kama of the Waimanu and Waipi'o Valleys on the island of Hawaii. But for the past eight years, I've been a resident here in Kahuku, as well as in Laie currently. O ko'u mana'o, o ka mea i loko o ko'u pu'uwai, 'a'ole pono ka ho'ai 'ia, ka ho'ohou 'ia, na lease a me kela mau me a pau no ka pu'ali koa Amelika. I just wanted to add my voice to the resounding chorus of no to no more leases to any of the military units and the military machine of the United States of America here in Hawaii. I am a firm believer in what was taught to me by my kupuna, that the way in which you malama, the way in which you relate to and treat the aina is the way in which you relate to and treat people. And the United States military has not been a very good caregiver of the land, nor has been a good neighbor, a good</p>	Please see General Response.

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		<p>occupier, whatever you want to call it, of Hawaiian people or people in general here in Hawaii. The United States military has been a main contributing factor to the fact that Hawaiians always consistently show up in all of the negative statistics in our society, whether it's lowest income, lowest education, houselessness, etc., etc., and that is because of our distance from our aina put on because of the military. We're not afraid of being attacked by anybody else when you were the first ones to attack us anyway in 1893. Makes no sense. And when they - - even when the Japanese came and attacked Pearl Harbor, they weren't attacking Hawaiians, they was attacking Americans. They weren't attacking us. So to have this idea that we need to practice war, my mind thinks back to Aunty Loretta Ritty comments back in the '70s for Kaho'olawe. Instead of practicing war, why not practice aloha? Why not practice love? Why not do something that's actually beneficial for our people and for our aina? Because all the things that you do is a lie. The way in which you malama the aina, the way in which you have related to the aina is nothing but death. And so you put that on all of us, as well. You have no care for us. This facade that you have, this militarism facade that you say you will care for the people and help the people and want to benefit the people, when we know the only thing that you've brought since your first coming here, 1893, is death. So I just want to mahalo to all of our ho'ohana, all of our ohana from all over the moku for coming into supporting this area. Again, I'm not a kupa. I'm not of this area, but I am -- I am a descendant of this aina. And I just want to add my voice to the chorus, a'ole. Ola kala.</p>	
Ashley Galacgac		<p>My name is Ashley Ancheta Galacgac. Born and raised on O‘ahu as a second-generation settler of immigrants from the Philippines, I oppose U.S. military leases. The U.S. military needs to clean up and restore the lands, and immediately return the land to Kānaka Maoli. 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. I tuned into the scoping meetings and event attended in-person for the comments on Environmental</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>Impact Statement (EIS) for Army Training Land Retention (ATLR) of "State" Lands at Kahuku Training Area (KTA), Kawaioloa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O’ahu.</p> <p>I want to underscore the gender-based violence that the U.S. military perpetrates in Hawai’i. The crisis of missing and murdered Native Hawaiian girls, women, and māhu is a result of the entitlement colonizers uphold to desecrating lands and exploiting bodies in Hawai’i. There is documented research and evidence in this report: <a href="https://www.oha.org/wp-content/uploads/MMNHWG-Report-Web.pdf">https://www.oha.org/wp-content/uploads/MMNHWG-Report-Web.pdf</a>. There have been numerous cases of active military personnel soliciting sex from children!</p> <p>Communities under U.S. occupation have experienced the sexual violence over generations. The U.S. military is responsible for what happens on bases and off base. On the U.S. Army website was this message, "Did you know? The U.S. Army SHARP Portal shared ways to implement a culture free of sexual harassment and assault." Even the U.S. military knows that this is a serious issue within the U.S. ranks and in surrounding communities where they occupy.</p> <p>The environment impact statement does not account for the cases of gender-based violence as reflected in cases of domestic violence, intimate partner violence, sexual assault, and sexual harassment that military personnel commit. Many of these cases even go unreported. These gender-based violence numbers and data need to be released to the public and also included in the EIS. The public needs to understand the true cumulative impact of the U.S. military as this happens on the lands and people.</p> <p>I stand alongside the people of Hawai’i as we demand the U.S. military stop its training and implement an immediate clean-up and restoration effort. Only then can the people of Hawai’i be healthy and safe. The people of Hawai’i 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.</p>	

Commenter	Submitted By	Comment	Response
		Everyone is cared for and every BODY is safe. In conclusion, no U.S. military in Hawai'i. Land Back! Bodies Back! Moana Back!	
Karen Gallagher		The military grabbed "strategic" lands all across this beautiful nation in the name of safety. The world has changed, warfare has changed significantly. Most of this land is no longer "strategic" and MUST be returned to Hawaiians. WAY TOO much land is inaccessible to Hawaii residents, and much of this land is beautiful beaches, valuable forest lands and other properties that would be better utilized if in the hands of the indigenous peoples. Give it back!	Please see General Response.
Terry Galpin		Aloha. My name is Terry Galpin Prejean, and I stand here before you as a representative of our dirt bike community up at Kahuku. Just a little bit of backstory, our park has a revocable permit with the state, yet the military controls when we can open and when we can close. The Kahuku dirt bike park is the only legal place that our 4,000 members can ride legally. By the end of 2024, based on your military training, we will be shut down a total of five months. Yet we are responsible for the erosion control; we are responsible for the invasive species, and so on. What we pay a month in rent to the state is 1,000 percent more than what you pay all year. We are a small, volunteer-only based community -- I lost my place. We are the ones cleaning up after each of your training. We find razor wire, thousands of MREs. This last training, our volunteers had to take care of razor wire in our kids track. And this is after we were told everything was cleaned up. We are the ones who, a couple of years ago, when the fire broke down allegedly by a resident shooting off illegal fireworks, it was our volunteers riding their dirt bikes to the top of the mountain, digging holes, and putting the fire out when the residents of Kahuku could get no help. In spite of what you said, sir, in your opening remarks, our concern is that the military will gain more control and completely shut our park down. During the land board meeting a few months ago, the chair asked: How do you work with us? And then the response was -- please let me finish, okay -- and the response was that you work around our schedule. That is not	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>true. We are told when we are to close and when we are allowed to open. So in closing for us, we stand on the grounds with everybody here, everybody who's been attending the meeting so far that we do not support any lease renewals, land swaps, or any type of land deals. It's time to return all of this back to the people.</p>	
Erendira Garcia		<p>End the military lease of Hawaiian lands on Oahu. Not only should the land lease end and be returned to the Hawaiian people, but <u>the current EIS is not transparent enough about the proposed military activities and adverse effects</u>. The leases and proposed activities prevent historical and cultural practices on sacred sites and land. End the lease and return the land.</p>	<p>Sections 3.4 and 3.5 of the EIS address impacts on historic and cultural resources and cultural practices from ongoing training activities on State-owned land, and identified adverse impacts ranging from negligible to significant.</p>
Janae Garcia	La Wai Ola	<p>Such impacts would include: the cumulative reduction of our long-term food security, by the occupation and unremediated contamination of historically abundant agricultural lands which, in turn, contributes to Hawai‘i’s climate-vulnerable dependence on imported food; the continued disconnection from and harm to ‘āina that disproportionately affects Native Hawaiian health and wellbeing which will be increasingly challenged by climate destabilization; and the carbon footprint and impacts of the national and multinational exercises that would depend upon the retention of these lands, as well as that of the United States' "rivals" who will only increase their own military carbon footprints to "deter" the U.S.</p> <p>The current draft EIS fails to evaluate these concerns. Cumulative impacts on food security and Native Hawaiian health and wellbeing are not assessed in the broader context of climate destabilization – which the Department of Defense (DoD) has an immense role in accelerating.</p> <p>Meanwhile, greenhouse gas emissions (GHG) are vaguely and simply described in the EIS as the same as those associated with current training activities. There is no discussion of the overall impact of GHG emissions over time and on adjacent areas, or of the cumulative, indirect, and secondary GHG impacts of the larger deterrence strategies that rely on the continued military use of these lands.</p>	<p>Section 3.7.4 addresses the methodology used to assess impacts on GHG emissions and air quality. GHG emission and air quality impacts are addressed in Sections 3.7.5 and 3.7.6. Cumulative impacts on air quality and GHG emissions in areas outside KTA, Poamoho, and MMR are not relevant when combined with the impacts from the Proposed Action, and are outside the scope of the EIS. Impacts from emissions outside the training lands and other nations' militaries are beyond the scope of this EIS. Relevant climate change impacts are discussed throughout Section 3.7. Due to the administrative nature of the Proposed Action, there would be no changes in the types or tempo of training activities, and KTA Tract A-1 is the only State-owned land parcel within an agricultural SLUD, the Proposed Action would not have a measurable secondary effect on climate change-related food security issues. Impacts from loss of ‘āina on communities with environmental justice concerns are discussed in Section 3.12.5.</p>



Commenter	Submitted By	Comment	Response
		<p>Critically, by neglecting to adequately evaluate these impacts, the EIS also fails to describe how they could be mitigated, especially with the DoD's vast resources and status as the largest institutional consumer of fossil fuels.</p> <p>Instead, some of the many possible mitigation measures that could and should be discussed include:</p> <p>The development and widespread sharing of decarbonization technology, supportive infrastructure, and other resources with other militaries and civilian populations;</p> <p>Concrete benchmarks for the reduction of carbon-intensive training and other activities to the bare minimum, and for the restoration and return of lands and waters to Indigenous stewardship; and</p> <p>The continual tracking of the full range of threats the climate crisis poses to the United States and the planet.</p>	
Janae Garcia	La Wai Ola	<p>Last month's 2024 Rim of the Pacific (RIMPAC) exercises ironically failed to address the greatest threat that humankind has ever faced: the unprecedented destabilization of our climate.</p> <p>Fortunately, this month, an Army draft environmental impact statement (EIS) provides the Hawai‘i community a unique opportunity to continue our longstanding climate leadership, and demand that the U.S. military more fully contemplate its historical and ongoing role in this existential crisis. Hawai‘i has long been a model for climate action. Most recently, in early July, 14 ‘Ōpio, mostly Kānaka ‘Ōiwi, made international news after prevailing in their years-long legal campaign to decarbonize our islands' transportation sector, as required by law. The ambitious settlement agreement in the Nāvahine v. Hawai‘i Department of Transportation lawsuit, signed by Gov. Josh Green, now signals to the world, once again, that our islands are willing to do our part in this humanity-wide fight for survival. Notably, the settlement is rooted in, and reaffirms, a timeless commitment to aloha ‘āina and to future generations that may be the key to a hopeful planetary future: from early Kingdom laws that enshrined ‘āina stewardship in land tenure and resource management, to precedent-setting supreme court rulings and constitutional amendments establishing</p>	Please see General Response.

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		<p>the public trust in water, to more recent statutory commitments to community-based stewardship models and unprecedented clean energy standards. Hawai’i has a rich history of thinking and acting beyond the short-sighted Western economic assumptions that have now placed our our Earth in peril. This month presents yet another opportunity for Hawai’i to carry this legacy forward, and have a potentially outsized impact in the war against climate change. The U.S. Army is currently accepting written comments, through August 7, on a draft EIS for its "retention" of "ceded" lands on O’ahu; lands it has leased from the state for the last six decades. Public comments regarding the need to more fully assess the climate impacts of such "retention" could force a conversation on what it will truly take to ensure our long-term security, and survival. For example, the EIS is required to assess the direct, indirect, secondary, and cumulative climate-related impacts of the Army's future use of the leased O’ahu lands. These arguably include impacts associated with the larger strategy of Indo-Pacific "deterrence" for which Army Gen. Charles Flynn claims the lands are essential.</p>	
Carol Gaylord		<p>The damage to the land and it's native people is self evident. bombing, excluding native peoples from the land, exposing generations of hawaiians to poverty, exploitation, inability to afford to live on, manage, much less thrive in our native land has caused irreparable harm. leave and pay reparations. we don't recognize your right to be here, the us government recognizes the illegal overthrow of our monarchy, so it's time to go. the army has wreaked havoc on us and our land. you haven't increased our safety in fact you have harmed us financially, environmentally historically. go. leave. you're not effective guardians of the land or biodiversity.</p>	Please see General Response.
Tina Gehres	YesHope.org	<p>The Committee on Oversight and Accountability is investigating the Department of Defense's (DOD) failure to prevent waste, fraud, and abuse. In November 2022, DOD failed its fifth consecutive annual audit, unable to account for sixty-one percent of its \$3.5 trillion in assets--assets paid for by working men and women across our country. In sum, the DOD and the various branches of the military</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>do what they want when they want while creating the appearance of accountability with their taxpayer-funded impact studies. It is no secret that the DOD and its various branches have poisoned our waters, our soil and our air--on and off the property they lease while rarely being held to account. In sum, the DOD is the worst type of tenant one might imagine leasing to. It rapes the leased land it has paid a full \$1 to inhabit, denies and minimizes the impact it has on the leased properties and has repeatedly revealed that it is unable and/or unwilling to be held accountable for its actions. The Hawaiian leases at issue must not be renewed given such a dismal track record.</p>	
Claire Generous		<p>These areas are full of species found no where else on earth. The rightful people, kanaka and locals, should be the ones who can steward these areas. O'ahu is already heavily over-militarized. Rather than taking up more land, it should be on the military to steward the land they already manage and own. It is beneficial for all involved to create better relations and also for long term sustainability of natural and cultural resources. This provides O'ahu more resilience against threats like climate change, an issue that affects us all. By keeping areas more ecologically native (species), there is more possibility for carbon sequestration, healthy watersheds, and intact soil (lessens erosion). These issues affect ALL people in Hawai'i. I implore you to reconsider the lease and return this land to those who can steward it responsibly and generously.</p>	Please see General Response.
Jacob Gerard		<p>The U.S. (and any other) military presences on Hawaiian lands has caused extensive damage to the environment, threatening their precious natural resources such as their water and the indigenous wildlife like the 'apapane or 'i'iwi birds. The Army has consumed more fossil fuels and energy than most countries in the world, is the world's biggest greenhouse gas emitter, and is verily responsible for the destruction and desecration of numerous Hawaiian burials, cultural sites, and natural landscapes. This is not only a harmful affront to an indigenous people's land and culture, but subsequently as a result, to their very lives and well-being as well. This, RIMPAC, and so much of the U.S.'s presence and operations in</p>	Please see General Response.

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		<p>the Hawaiian Islands (and, generally, the Pacific as a whole) must be addressed and halted, all activities and such that result in destruction of the environment and overconsumption of natural resources must stop, and so forth.</p>	
Cassidy Gilroy		<p>A country that has illegally been occupying O'ahu for over 100 years in addition to countless other islands and nations since its inception under false pretenses has no right to have 1 lease on any of those stolen lands- let alone renew and expand it. Especially considering the United States Military is one of-if not THE largest user of fossil fuels and destructive threats to Planet Earth. They have bases in over 50 different countries (that They recognize) along with previously sovereign nations like Guam, Hawai'i, Alaska, and Puerto Rico (Boriken) that they've beat into submission via colonialism and entitlement. The United States model is one that is parasitic at best and genocidal at worse.</p> <p>Before a parent lets their child get that puppy they've been begging for, they first make sure that the child understands how to properly take care of another living being. Often times, they will start by teaching the child how to tend to a plant. As the child learns, they usually grasp the concepts they will need later, and based on the child's performance, the parent will decide if the pet is worth the investment. If the child does not water the plant, or puts something like Kool Aid in the plant, the parent would course correct, explaining how plants need proper nourishment just like you and me.</p> <p>The United States Military is the child who drowns the plant in Kool Aid, blames the plant for dying, then proceeds to take the pot and dirt where the plant once laid and turn it into a weapon to hit their sibling. Replace the plant in the pot analogy with HUMAN BEINGS in sovereign nations, and this has been their M.O. for HUNDREDS of years- spanning from Chattel Slavery, to the Trail of Tears, to Flint, Michigan, to Red Hill, to Red-lining, to the "humanitarian aid" base in Palestine, to the creation of Food Deserts- Pollute, Substitute, and Commodify the people into silence through disregard for all living beings.</p>	Please see General Response.

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		<p>The U.S. Navy still has done little-to-nothing about Red Hill, and the money that the Military is trying to be put into this lease should be denied and immediately redirected into cleaning up and de-occupying ALL of Hawai'i. July 4th just passed, and the people of Hawai'i have not been Independent or Free from the U.S. since BEFORE January 17, 1893- the end of this illegal occupation is BEYOND overdue. If we're getting technical, Hawai'i hasn't been free of Occupation since Captain Cook landed on Kauai on January 18, 1778.</p> <p>Free Hawai'i, say NO to renewing the military lease, and EVICT the United States Military- because they have been illegal, destructive tyrannical tenants who have destroyed lives, families, ecosystems, and anything else that stands between them and profits.</p>	
Christina Gleason		<p>The land should revert to the Hawaiian people. We should be giving land back to the Indigenous peoples we took it from. And if you don't give the land back, you need to pay full market value for the land to support the people who live there.</p>	Please see General Response.
Makanalani Gomes		<p>Aloha mai kakou. I'm Makanalani Gomes, a native Hawaiian and Filipino woman. I'm a kama of Waipi'o a lua, a child of Waipio, Oahu, the adjacent ahupua'a, our land division, hugging and embracing up against this sacred Wahiawa. We share our water sources, and I am a descendant of fresh water, and therefore a water protector and a land defender, especially to the places and waters that have raised and fed me and my ohana since time immemorial. As a core member of Affirm Hawaii, and one of three kanaka wahine serving on the murdered, missing native Hawaiian women, girls, and mahu report, I am here to be the vessel to say "no" for so many who cannot or could not. Affirm is a transnational feminist organization, where native, black, and immigrant women unite to fight against imperialism and colonization. In Affirm, we believe that dismantling patriarchy must be at the heart of this struggle, if we are ever to truly address these oppressive systems, because we know all too well that where the land is plundered, resources extracted and poisoned, the women and feminine relatives are decimated as well. Dismantling patriarchy means the</p>	Please see General Response.

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		<p>end to the abusive, extractive relationship that the so-called United States forced upon Hawaii by way of the military. For 131 years, Hawaii has been in a non-consenting, inhumane relationship with a so-called US.· Can you imagine what it's like to be in a forced, intimate relationship with the most heinous abuser on this planet?· The rape of both place and people coincide, and it is palpable, as we see our Palestinian relatives facing what we know could one day be our own fate. The mental warfare is ringing out not only in our hearts and our minds, but through the vibrations of our land and our waters.· The poison is not only on the surface of bombs and explosives, but in the depths of our skin, in the vessels of our souls.· And we say, "No more." As a result of this non-consensual relationship, our people have met the same fate as our 'aina.· Especially our native Hawaiian women, girls, and mahu, those closest in an embodiment to earth mother, have endured the brunt of the physical abuse. From part one of the MMHNSHWGM report, 38 percent of those arrested for soliciting sex from a 13-year-old online, through Operation Keiki Shield, are active-duty military personnel.· Thirteen years old.· Think of your 13-year-old self.· Think of a 3-year-old you love and care for.· Thirteen years old. Because, for indigenous women, girls, mahu, two-spirit folks, and our relatives, these are more than just statistics, but a shared reality, empowered by colonization, upheld by the military, and the rape culture it glorifies. We would be remiss if we did not acknowledge all of our sisters and relatives who were murdered and those still missing by these very systems of violence.· We honor them and their families today, and every day, by continuing to dismantle these structures that do not honor and revere the divine feminine.· We honor when we reclaim.· We restore and heal what has always been sacred. As our land is seen as idyllic paradise, for -- for mere enjoyment and pleasure, so too are our bodies.· On the continent, we see this in casinos and man camps.· Here in Hawaii, it's on the streets of Waikiki, where the average profile of a missing native Hawaiian is a 15-year-old girl in Waikiki. The military contributes to the sexual exploitation of women, children, and trans</p>	

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		<p>folks. The military is a breeding ground for sex buyers and tourism, and RIMPAC provides these breeding grounds for it. Enough is enough, and the leases, and the extraction and exploitation of land, water, oceans, and kanaka. We are here to say, "aole." "No" to our land. "No" to our bodies. "No" for every sister, every relative, every piece of land and water that couldn't say, "no." Aole. Women and land not for conquest. Land back. Bodies back. Moana back. No more stolen relatives. Cancel RIMPAC and the leases. Demilitarize now.</p>	
Francis Gora		<p>How is it, everybody? Brother, when asked for them, I bought the treaty. I got -- I don't want to go any further because there is 700 Indian treaties across the US. You guys lost the Bolt case, and all the other casinos and the gaming and the hunting and the fishing and the land rights. I just got back from Seattle, talking to some legal counsel up there. The direction is the treaty. You guys got to honor the treaty. You guys broke the treaty with a full scale invasion in 1893. USS Boston in the harbor. Your troops at Ali'iolani Palace. Iolani Palace. All your 50 overthrow guys standing on the palace. The only way you guys got this, you guys had the Boston out there. Because eight years later, you guys went down to Samoa with the Boston and the Massachusetts and the Olympia, and you guys went, killed almost 80,000 Samoans. Went to the Philippines, another 30,000 -- 80,000 Filipinos. Next thing. You guys got to (indiscernible) your treaties. I think the Latin word is "Pacta sunt servanda." Francis Boyle came over here, and he explained things in 1991. Obey the treaties. Lastly, you guys get the Mahele. You guys The brother was up here asking for the treaty. This treaty is in your national archives, Kauikeaouli's treaty. Your supreme law of the land. US Constitution. You took an oath to it. Treaty of Friendship. know what the Mahele is. This is the Mahele. Kauikeaouli, on page 224 and page 225 of this Mahele, is his private lands, and it is Hawaiian government lands. I look at your fact sheet, and you guys say this thing belong to the state. In any title abstract, when you buy property, any title abstract out there, it starts from the beginning of when the title is registered and documented.</p>	Please see General Response.

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		<p>These have numbers.· Even in the Mahele, they have numbers. Even in the apanas, the land commission awards. It's not the land court awards; it's the land commission awards. Also, the palapala sila nuis that are in there get number in there.· And once you get numbers, they registered.· They're also -- those two, apana and the -- the apana and the palapala sila nuis, they are what they call the "prima facie."· These are land titles.· They're superior land titles. So I just going to ask you, where you guys' title?· You guys' name not in the Mahele. Kamehameha, his heirs and successors.· So when you guys get your name in the Mahele, you let me know where it stay in this Mahele.· Because it doesn't say, "US Army."· It doesn't say, "Air Force."· And maybe you guys got to go look for Edward Snowden. Aloha.</p>	
Pua Gora		<p>My name is Pua Gora.· I come together with my kupunas, who recently passed, 95 years old.· I come with my brothers and my sisters, who could not be here today, except for my brother, who talked about the great Mahele, as well as the treaties that he has.· I come together with my 64 nephews and my nieces, my 49 grand-nephews and my nieces.· I have five grandchildren. I know, falling on deaf ears, because you folks must be strong to have sat here, listening to all of us opposing any renewal of any leases in the state of Hawaii, writing notes, somewhat pretending that you care, and maybe might do something about it, but more than likely might not do something about it. This fake Hawaii government -- and I wrote this down because I want to stay in the two-minute guidelines, and I just did it now, not too long ago. That's why I'm one of the last. This fake Hawaii government, who is not the true landowners, and the fake government, comprised with more non-native non-Hawaiians, who are in treason with the Hawaiian Kanaka Maolis and the Kingdom of Hawaii, you talk about transparency earlier.· Please.· What is transparent is many Hawaiians have less than your beginning infantry military soldiers who just signed and enlisted.· Do you know some lands that were leased were returned to the fake state?· Then they, with hidden agendas, sold, and are still being illegally sold, selling our Hawaiian lands.· That's transparent.</p>	Please see General Response.



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		<p>Our lands, the Hawaiian lands, you rent for a dollar or made deals under the table -- who knows? -- don't legally belong to them or to you. It belongs to the heirs of Kamehameha III and all of its Hawaiian people. I used to live in Waimea on Hawaiian homesteads until my mom got sick -- and I was a caretaker -- which many of our neighbors had to stop building, and were forced to stop agricultural projects, stop their farming. Because why? We had live ammunitions that were bought there because you folks had practices there in years before. That's not transparent. And then it becomes listed as "barren lands." Where are the lands for the Hawaiians to build farms, procure, flourish, and thrive? It's not only the Army. It's the Navy. It's the armed forces. It's the air force, who is in constant desecration of the Hawaiian people. Before, we had no-flying zones. Now it's all open. Now the truth. You have weapons and the power to do what you want. And when you invaded our lands illegally, raped and robbed, and are still doing that in our lands, it's all in our history books. And, yes, you are still actively doing that. My mom said we are wai wai nui, caretakers of our lands, only as rich as the water that flows. And look what happened to the water. Was that transparent? This is sad and needs to stop. Today is 7/11, July 11. Hawaii is not a fast stop store of land. Every day in Hawaii, it's 9/11. It's like a memorial for all Hawaiians daily. Just return the lands. And "no" to any leases here forevermore.</p>	
Susan Gorman-Chang		<p>July 14, 2024                  Written Testimony for Draft EIR                  Aloha,                  'O Susan Gorman-Chang ko'u inoa. No Ewa Beach mai au. My name is Susan Gorman-Chang and I am from Ewa Beach.                  Military leases are a classic example of what the Western culture has done to attempt to sever the connection of Kanaka Maoli to the 'aina and serves to severely harm us all. The 'aina has been bombed, shelled and was used for live fire training and it is severely damaged. Military is not required to clean it up until leases expire!                  Allowing new leases and thus retention of these lands by the</p>	<p>The minimum NEPA and HEPA public review period for a Draft EIS is 45 days; the O'ahu ATLR Draft EIS had an extended 60-day review and comment period for the public. The Army is unable to accommodate a further extension due to timeline constraints for the future real estate actions following the EIS process.</p> <p>Range management activities regarding hazardous substances and hazardous wastes during the lease is discussed in Section 3.6.5.</p>

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		<p>military will exacerbate intergenerational trauma and further alienate Kanaka Maoli from these 'aina.</p> <p>Mahalo for acknowledging my testimony regarding this Draft Environmental Impact Statement for Army Training Land Retention of State Lands at Kahuku Training Area (KTA), Kawaioloa-Poamoho Training Area (Poamoho) and Makua Military Reservation (MMR) on the island of Oahu. First, I would like to request more time for our community to review this Environmental Impact Statement. This Draft EIS is a robust 2,798 pages long and we deserve a more reasonable amount of time it takes for a measured, careful analysis of the 2,798 pages. Being myself over 60 year old, I now read at a 30% slower rate than a younger person, and my focus is not equal to a younger person, so these thousands of pages put kupuna at a real disadvantage as far as reading through it all. This draft EIS came out June 8, 2024 and the due date for written comment ends August 7, 2024. I request a <u>two month extension until October 7, 2024</u> as the new due date for written comment submissions for the EIR. Allowing these leases to expire, to require the military to clean up the unexploded ordinances, munitions and all their pollution on these 'aina, and to restore the land to a healthy condition is an important first step in healing human beings, all flora and fauna and 'aina alike on this island of Oahu.</p> <p>Susan Gorman –Chang                      Ewa Beach, HI</p>	
Susan Gorman-Chang		<p>Second, to further understand the history of the parcels mentioned in this EIS, I am requesting complete title searches and complete Title Reports, starting with the very first Titles under the Kingdom of Hawaii and ending with the current date, for each of the parcels of land that the Army includes in this EIS; specifically For Makua Military Reservation (MMR)</p> <ul style="list-style-type: none"> <li>• Five TMK parcels (TMKs [1] 8"001:008 and [1] 8-2-001:001, 22, 024 and 025) and portions of four parcels (TMKs [1] 6-9-003:001, [1]8"002:007 and 012, and [1]8-2-001:002) These parcels are also referred to as the Makai, North Ridge, Center, and Couht Ridge Tracts. For Kawaioloa-Poamoho Trining Area (Poamoho) • TMK</li> </ul>	<p>Section 3.4.5.1 (KTA), 3.4.5.2 (Poamoho), and 3.4.5.3 (MMR) discuss historical land uses and, where available, Land Commission Award (LCA) grants and successive leases and title transfers. Documenting the history of ownership and obtaining title reports for each of the parcels is not within the scope of this EIS.</p>

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		parcel (TMK[1] 7-2-001:006) within Kamananui Ahupua'a. For Kahuku Training Area (KTA) • Two discontinuous TMK parcels (TMK [1] 5-8-002:002 and [1] 5-9-006:026	
Susan Gorman-Chang		Third, I would like a map and total acreage of ALL of the Hawaiian islands showing where the Army has control of the land for training of any kind, whether state land or federal land. This way, we can look at the whole picture of the military's training capabilities on our islands.	Section 1.1 states the Army has 51,000 acres of training areas across O'ahu. The scope of the EIS is focused on State-owned lands on Army training areas. An inset to Figure 1-1 has been added showing Army lands in Hawaii, and acreage across the island of O'ahu.
Susan Gorman-Chang		Fourth, I would like a map and total acreage of the entire Continental United States as well as Guam, American Samoa, Marianna Islands, and Puerto Rico where the Army has training areas of any kind. Again, this way we can look at the whole picture of the military's training capabilities worldwide	Please see General Response.
Susan Gorman-Chang		Fifth, in the Executive Summary, page 3.13, in the last paragraph it states, "...in 1893 when the Hawaiian Kingdom was overthrown." Please add the word "illegal" so that it reads "in 1893 when the Hawaiian Kingdom was illegally overthrown". The term illegally overthrown is not my term; it is the term used by President Cleveland in his address to Congress in which he stated ' the Kingdom of Hawaii was "unlawfully invaded by United States marines on January 16, 1893, which led to an illegal overthrow of the Hawaiian government the following day."	Please see General Response.
Susan Gorman-Chang		Sixth, please explain in writing how the Army could have a legal and enforceable lease with the state of Hawaii on ceded land, since the ceded land is subject to ownership dispute. Specifically, the Ceded land was land set aside by the Kingdom of Hawaii for the Kingdom of Hawaii. When the Kingdom of Hawaii was illegally overthrown, as stated above, those who illegally overthrew it stole the land and thus have no legal title to the Ceded land to this day. The Ceded lands have a clouded title, as there was a break in the title chain when those who illegally overthrew the Kingdom of Hawaii illegally seized these Ceded lands. If the land is not owned by the Lessor, how can the Lessee (U.S. Army) have any kind of enforceable lease on such land? The U.S. Supreme Court cases cited on page 3-14	Please see General Response.

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		addresses the issue of the Apology Resolution and substantive rights but not the issue with the titles to the Ceded lands.	
Susan Gorman-Chang		Seventh, on page 3-14 of the Executive Summary, it states the Army spends approximately \$1.5M annually on cultural resource management and \$5.6M on natural resource management on O’ahu. <u>I am requesting a detailed dollar breakdown and description of how exactly these funds were spent.</u>	Further details on the dollar breakdown of cultural and natural resource management programs and costs will not be disclosed for this EIS. Descriptions of programs can be found, respectively through the following websites: Cultural resources program-- <a href="https://home.army.mil/hawaii/garrison/dpw/cultural-resources">https://home.army.mil/hawaii/garrison/dpw/cultural-resources</a> ; Natural resources program-- <a href="https://home.army.mil/hawaii/garrison/dpw/natural-resources">https://home.army.mil/hawaii/garrison/dpw/natural-resources</a>
Susan Gorman-Chang		Eighth, there are dozens of endangered species in the areas the Army wishes to continue to lease and to put them in further danger is not acceptable.	Please see General Response.
Lisa Grandinetti		End the military leases now! The military only enacts violence on us in Hawaii. It’s stolen land and deserves to be given back to the people, not the military for \$1 a year. This is our chance to reclaim that land and restore it to what it should be. We need to heal the land and our communities, not extend the leases for the military.	Please see General Response.
Tyler Greenhill		No. Do not renew any military leases in Hawai’i. The Ameri3kan military is one of if not the greatest evil known in human history. We must protect our futures, our kids, and our lands. DO NOT RENEW ANY LEASES. Yankees go home. Cheers!	Please see General Response.
Regina Gregory		Comments re ATR-Oahu DEIS 1. The DEIS considers a very limited number of alternatives. It states that there are 51,000 acres of Army training areas land on Oahu. That should be more than enough for Army training without the need to retain the 6,322 acres of leased lands. But this DEIS does not include consideration of alternative sites. Moreover, as shown in Table 2.6, it disregards any alternatives that do not include continued Army training.	The EIS considers a reasonable range of action alternatives (nine). Five of those involved reduction or discontinuation of military training on State-owned lands and were considered but dismissed because they did not meet the purpose and need for the Proposed Action.
Regina Gregory		2. The DEIS does not adequately assess cumulative impacts. Since retention essentially equals the status quo, it can claim there is no change due to the proposed action and, therefore, a “less than significant” impact. But continued addition of, e.g., heavy metals in	Each resource area in Chapter 3 presents a discussion of the cumulative impacts of the Proposed Action when combined with other past, present, and reasonably foreseeable future

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		<p>the soil and water does have a significant impact. Continued noise has a significant impact on quality of life. Greenhouse gas emissions may be small on each US military installation, but together they constitute the largest source of greenhouse gases in the world. The environmental impact of Army training actually spans from mining the metals and manufacturing munitions, to the spread of death and destruction around the globe when the training is put into practice.</p>	<p>actions; assessing the total cumulative impact of the military is beyond the scope of this EIS.</p>
Regina Gregory		<p>3. The DEIS does not adequately assess economic impacts. Hawai’I real estate is much too precious to waste on military training. It is not a productive use of our land and is, in fact, it inherently destructive. “Encroachment management” further impedes economic development. Given that Oahu is approaching limits to land and water resources, it is important for the military to reduce its footprint. The DEIS has no discussion on the opportunity costs of the military use of these lands, i.e., things that could be done instead of military training. Kahuku, for instance, is needed for wind power. Makua was supposed to be given back to the people who were evicted in World War II. Clean-up after vacating the leased lands could provide local employment opportunities.</p>	<p>Alternative future land uses for land not retained following lease expiration are not within the scope of this EIS, because that would be a State decision. Text has been added to Section 3.11 regarding potential local employment opportunities for lease compliance and cleanup actions.</p>
Regina Gregory		<p>4. The DEIS lacks certain policy considerations: · Hawai’I’s Public Land Trust is to be kept whole until such time as the nation is restored. Your proposal is contrary to both keeping the trust whole and restoring the nation. · It appears that the mission of readiness to perform combat is not for “defense” or “security,” but for global domination. Given that past US wars are now considered to be big mistakes, you might want to rethink all this. · You may have noticed from your public hearings that it is time to shift from “consultation” to “consent” with regards to Native Hawaiians. In fact, Article 18 of the UN Declaration of the Rights of Indigenous Peoples requires free, prior, and informed consent. · Only three military leases in Hawai’I are considered crucial: Barking Sands (Navy), Ka’ena Point (Air Force), and Pohakuloa (Army). The land retentions proposed in this DEIS are not crucial. · In 2023, the Hawai’I State Legislature passed HR175, urging the Board of Land and Natural Resources to</p>	<p>Section 3.2 addresses land use policy considerations.</p>

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		<p>establish a task force to prepare a feasibility plan for the transition of the management of the Makua Military Reservation to the state from the United States Army upon the expiration of General Lease number S-3848.</p>	
Regina Gregory		<p>Since the limited alternatives considered create significant adverse impacts, and only the No Action Alternative would result in significant beneficial impacts, you should choose the No Action Alternative. Even more beneficial impacts could be had from vacating Makua Military Reservation entirely, including the land taken by Executive Order in 1964. Regina Gregory</p>	<p>Section 2.5 of the Final EIS has been revised to state the No Action Alternative is identified as the preferred alternative for MMR (i.e., the State-owned land at MMR would not be retained). Access to U.S. Government-controlled land at MMR would continue per EO 11166. See Section 2.3.3.2 and the analyses under each resource section for the No Action Alternative impacts at MMR.</p>
Max Gross		<p>My comment is that the military should discontinue their attempts to extend the "leases" of these lands immediately. Why do they bomb and destroy the land here when everything is so limited already. The water shed on kaho’olawe was destroyed via this "training". Do you want to do the same to O’ahu? A’ole; go home. We have our work cut out cleaning all the messes youve already made.</p>	<p>Please see General Response.</p>
Aimee Guerard		<p>I am writing to formally oppose the Army's proposed 65-year lease of 6,322 acres of land in the Hawaiian Kingdom, encompassing the areas of Makua, Poamoho, and Kahuku. This land is historically significant and belongs to the Hawaiian Kingdom. The long-term lease perpetuates a legacy of occupation and disrespect for the indigenous rights of the Hawaiian people. It is crucial that we prioritize the preservation and rightful stewardship of this land by its original inhabitants. In addition to its cultural importance, these areas are home to unique and fragile ecosystems that must be protected. The ongoing military activities pose significant threats to the native flora and fauna, potentially leading to irreversible environmental damage. Preserving these unique environments is essential not only for the biodiversity they support but also for the ecological health of the region as a whole. I urge you to reconsider this lease and recognize the importance of returning these lands to</p>	<p>Please see General Response.</p>

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		<p>the Hawaiian Kingdom. Continuing military occupation on these sacred lands not only disrupts the natural environment but also infringes on the cultural and spiritual practices of the Hawaiian people. Thank you for your attention to this critical matter.  Respectfully, Aimee Guerard [REDACTED]</p>	
Dana Ha		<p>The military leases on O'ahu should not renew. Kānaka Maoli and various communities members have come to testify against the leases being renewed as the military had done enough damage to the islands.</p>	Please see General Response.
Lori Halemano		<p>Aloha mai kakou.· My name is Lori Halemano.· I was born and raised here in Wahiawa.· Moved away at age 26.· Although I've been living outside of Wahiawa for almost 30 years, I felt the need to be here because this is my home and always will be home for me.· We still have 'ohana here.· I still have 'ohana land here, where six generations of my 'ohana were literally born in the same houses on our property. As a child, we grew up hearing bombs, cannons, grenades, and large caliber guns going off. It was normal to us.· Yet there is nothing normal about hearing extremely loud explosions at all hours of the day and night while you are trying to sleep, the explosion scaring babies and pets and the elderly. I now live on the other side of the mountain, in Waikele.· But I can still hear the loud explosions from that far away, as can some of my friends in Waianae, who are even farther over on the other side of the mountain. My grandfather was in the Army, and served in Vietnam.· As a young child, I remember how much the explosions at Schofield would rattle him.· His PTSD was extreme, and I remember seeing him get on the ground and cover himself when he heard the explosions.· I'm sure a lot of other retired veterans in Wahiawa and the surrounding communities also still deal with PTSD, and I can't imagine how horrible it must be for them to have to hear the loud explosions, even after retiring from the military. I worked for a company called "Native Hawaiian Veterans."· And I worked on a project for our subsidiary company, called "Malama 'Aina," which means to take care of the land.· I was a project manager, in charge of ensuring that the unexploded ordnances at Pohakuloa, Kahuku,</p>	Please see General Response.

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		<p>and Waikoloa were removed and cleaned up. I worked alongside with the US Army Corps of Engineers to get the cleanup done. Well over \$30 million has been spent on the cleanups, and is still an ongoing task until today. People are still finding UXOs across the island, including at Makua, Kolekole, and on Schofield and other areas across the island. I am a direct lineal descendant of Halemano. I'm able to trace it back 11 generations. And I'm speaking tonight because I want to ensure the protection of this 'aina for 11 more generations and beyond. Halemano ahupua'a spans -- from my knowledge -- Waialua -- all the way from Waialua up to Kawomaho (Poamoho) up to Waianae uka, all the way out to Honouliuli, which is Kunia and the Ewa Plains. It is the largest span of land in the district here on the island of Oahu. Being a former Navy spouse of 14 years myself, I understand the importance of the military presence here in Hawaii, due to its strategic location in the Pacific. However, the US armed forces are visitors in our home. We are the host culture, and you are our guest. It's a privilege for the military to be here on our 'aina. We as a people are connected to the 'aina. We are the 'aina. Our state model is "Ua mau ke ea o ka 'aina I ka pono," which translates into "The life of the land is perpetuated in righteousness." What the military has been doing to our 'aina is far from righteous. It isn't preserving the life of the land. It is destroying it. One dollar to -- one dollar to lease thousands of acres of land, which are being used to desecrate and destroy sacred lands, all while our own people are houseless and without any land. Just take a look around this community in Wahiawa, and you'll see how many homeless people we have. Part of the military's mission is to serve and protect the people. But what's being done here in Hawaii is actually hurting our people. The same has been done to the people of Guam and the Confederated States of Micronesia, who are suffering with long-term effects of the damage that the military has done to their people. We are living human beings, and don't deserve to be poisoned, ignored, and forced to leave our homeland. Just as it is the military duty to serve and protect us, it is also our kuleana to</p>	



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		serve and protect our land. I hope that you will take into account all of these people's testimony, and consider ending the leases for Kahuku, Poamoho, and Makua. The military already has enough of our prime land, and we want our 'aina back.	
Judith Hall		I am opposed to the continuation of use of these lands for military purposes! O'ahu is in a housing crisis with thousands of local residents leaving the state due to lack of affordable housing. This land is needed to build housing for local population!	Please see General Response.
Mai Hall		Aloha, I am in opposition to the Army extending their lease on these Hawaiian lands. As a spouse of an active duty Airman, and a Native Hawaiian, my needs as a Hawaiian must come first. He Hawaii au, mau a mau. I am Hawaiian now and forever. I cannot sit by and allow the military to keep desecrating Hawaiian lands. Look what the Navy did to Kahoolawe. The Army has many other lands to train at and to practice its amphibious warfare. You still have Bellows and Pohakuloa. You don't need these three properties any more. Better yet, you can train in California where there is lots of land to destroy. At these three properties, there is no military housing available. All those who practice and engage in military training have to live elsewhere. Hawaii is already stacked full with residents in a housing crisis. By keeping copious amounts of military here with a shortage of military housing, is irresponsible. There is not enough land to house the military, neither is there enough healthcare services to keep them around. The military population is unsustainable in Hawaii. Hawaiians have always been a sustainable people. We care for our lands and clean up our messes. Give us back our lands and we will clean it up the way it should be. To nourish our people, and so our legacy may live on. Do what is pono, what is just and right. Mahalo.	Please see General Response.
Mai Hall		Aloha mei kakou. Aloha, Colonel Steve. Colonel Steve, right on. O Maikapuaihilani Hall ko'u inoa, no kalihi mai au, akā noho au i Alia Pa'akai, ma ka 'ao'ao o Red Hill. Aloha. My name is Mai, and I'm originally from Kahili far, far away that side. Just so you know. It took a lot of effort to come here tonight, but as Papa and Oahu a Lua gave birth to this island Oahu, what happens on one side of the	Please see General Response.

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		<p>island affects us all. And you need need to know that. There are thousands of us on the other side of the island who couldn't be here tonight, so we bring this message together in solidarity to you. . . . . I am married to an active duty service member. Our family was poisoned by Red Hill, and we're still being poisoned. So I know intimately of the distrust by the military, and I know it has to stop, but I'm going to focus on the land that is rightfully ours that needs to be given back. . . . . I'm in opposition to extending the lease for the military. Because I told my husband I'm a Kanaka Maoli first, I just happen to be married to you. He Hawai'i au mau a mau. I am Hawaiian now and forever. . . . .[...] And if it happens in my lifetime, I will be the first one in line with my ohana and my active duty servicemember to PCS out of here if they tell us to go. Because I know my family will be back. I have kuleana here, but I know it is the pono thing to do to send some military members away, and that is what should happen. . . . . Give us back our land, clean it up. Actually, let us clean it up. We'll do a better job. Mahalo.</p>	
Mai Hall		<p><u>And I noticed that those three parcels of land do not house a single service member or family. I didn't know that there were over 120,000 military servicemembers and their families living on this island alone. According to Uncle, that's -- that's more Kanaka Maoli on this island, right? Military is at 11 percent and Kanaka Maoli is only, what, 11, 12? That's got to change. . . . . And did you also know that the military make up 20 percent of the real estate investments, investments in Hawaii. There are way too many military servicemembers here.</u> These areas do not house military servicemembers. The military is unsustainable on our islands. They need to give us back the land and some of them need to leave. . . . .</p>	<p>Sections 3.11.5.1, 3.11.5.2, and 3.11.5.3 discuss population and household statistics for KTA, Poamoho, and MMR, respectively. Section 1.2.4 describes the importance of the O'ahu training areas to national defense.</p>
Kristin Hamada		<p>Support giving back all land &amp; stopping any future lease of the land to the military. The EIS clearly states more damage will happen to the land if the lease is renewed. It is clear from the military's own document that the land will continue to be damaged. The military thinks it can buy Hawaiians' desire to be honorable stewards in perpetuity by leasing lands &amp; giving money to Hawaiian</p>	<p>Please see General Response.</p>

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		<p>organizations. Hawaii's communities cannot be bought. Stewardship is the goal &amp; is the pono outcome from this process. I strongly opposed extending the leases. The military is not welcomed to be here. All they do is destroy land to enable them to destroy life in the name of US imperialism. Please leave &amp; never return. We want free healthcare &amp; land back. End the occupation. Land back please.</p>	
Lehua Hanaike		<p>The United States military has been negligent towards Hawai'i, our lands, our oceans and our people. Acts of war continue to take place, even though we (and those before us) have made it abundantly clear that U.S. military presence is unwanted. The illegal occupation has been acknowledged by your Commander in Chief and can be found in Public Law 103-150. We urge you to take responsible action to promote a Hawai'i we can call enjoy in the future, by NOT using our islands for war and war games, by not attempting to renew leases on our lands. We the people of Hawaii have been suffering at the hands of your government, broken promises made, and our own people go house less or forced to move away while the military gets to enjoy with all the comforts and cause inflation. Please be informed that acts of eat, regardless of who approves them, shall be punishable by law and all those involved WILL be held responsible. Genocide, torture, war crimes, and conspiracy just to name a few. We do not want, nor do we need the U.S. military in our sovereign nation. Please vacate ASAP and allow us to heal. Mahalo for your time, Hanaike ohana</p>	Please see General Response.
Kaimipono Hanohano		<p>Aloha mai kākou. 'O Kaimpono Hanohano ko'u inoa. No Maui mai au, akā no na'e noho au ma Ka'a'awa I kēia mau ā. So aloha. My name is Kaimpono Hanohano. I live in Ka'a'awa, but I'm from the island of Maui. My father comes from the island -- from this island, from Punalu'u, in an ahupua'a called Papa'akoko. I stand here before you representing my ohana who was unable to come here. I have children who attend this high school, and I encourage you to allow them to give testimony not tonight but another day, because their voices need to be heard. They will be the ones that will have to deal with your effects, as well. So I just want to bring up a few</p>	Please see General Response.

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		<p>things that -- that has happened on the island of Maui that I've lived through, the building of the Daniel K. Inouye telescope and then also the leakage of fuel that happened on that mauna and that my grandmother had to be -- drink the water that contaminated -- that was contaminated. My grandmother and my mother had to live through the bombing of Kaho'olawe, like many other people's ohana. They have memories of tremendous trauma from that effect. We cannot forget that -- that wasn't a long time ago that that happened, but it -- our families are still dealing with that. And then we also need to remember our brothers and sisters in the Marshall Islands. They reminded us at FestPAC of your relationship -- or your bombing that you did in their islands. And we will not allow that to happen here. In closing, know that I'm here by myself tonight. But I have five children that I'm raising to know that you are corruption, and they will not be fooled by your tactics. And I just want to close. E iho ana o luna. E pi'i ana o lalo. E hui ana nā moku. E kū ana ka paia.</p>	
Jennylee Harris		<p>I Jennylee Harris oppose any and all military training on all Hawai'i islands.</p>	<p>Please see General Response.</p>
Jessica Haskin		<p>Please DO NOT renew the leases. These Hawaiian lands should be used to benefit the Hawaiian people, not the military.                      Thank you,                      Jessica Haskin</p>	<p>Please see General Response.</p>
Pua Heimuli		<p>Aloha mai,                      I am writing to oppose the Draft Environmental Impact Statement (DEIS) for the Army's proposal to renew their state leases for lands in Kahuku, Poamoho and Mākuā for another 65 years. The DEIS does not meaningfully address the concerns of the Military presence in Hawai'i and on these lands.                      The damage caused by military activity on the state leased lands has negative impacts on our human communities, as well. Fires threaten the safety of nearby communities and forest communities have been degraded because of army practices. Concerns over soil and water contamination due to metals and chemicals involved in military activity have never been fully addressed.</p>	<p>Please see General Response.</p>

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		<p>Importantly, these lands are culturally significant. Ongoing desecration to this 'āina is painful to Kānaka 'Ōiwi and local people who wish to see these environments treated with respect. These military practices keep our communities from accessing lands even after the military finishes their exercises because they don't clean up afterwards. The state leased lands must return to the State once the Army's lease expires in 2029.</p>	
Hanaloa Helela		<p>Aloha mai kākou, 'Ano'ai. My name is Hanaloa Helela, and I am an aloha 'aina, just like the majority of the people in this room. Yeah? We are not only representing our own kupuna. We are bringing our kupuna together. Yeah? We are unifying. We are in solidarity. I think it's really clear that the vast majority of the testimonies on these three nights have been "no" to lease renewals. And I further that. And you heard me two nights ago. So I'm going to say it again. "Aole" to any lease renewal. Yeah? The time is up. Long time. We've been doing this from even before 1893. Yeah? And as many folks have already pointed out, you don't have legal standing. No matter how much you try to dress it up in codes and statutes and regulations, we know the truth, because we also read the US Constitution. And folks have mentioned that. Yeah? The Newlands Resolution isn't a treaty of annexation. It can't be. It was a simple majority, a joint resolution. I wonder what kind of joint that was, because it wasn't the real deal. You did not get two-thirds majority vote of the senate, yeah, which is required by your constitution. America is seen throughout the world as the upholder of democracy -- well, at least it used to be -- the champion of democracy. Yeah? But it was the Hawaiian people who exercised democracy in a way that hasn't been seen since. The vast majority, 38,000 people out of 40,000 signed petitions, two petitions, Hui Kalai'aina and Hui Aloha 'Aina, protesting the annexation to the United States in any form. Yeah. That's -- that is the truth. That's the fact of the matter. We learned about your -- your process, and we said, "Okay." And our kupuna said, "We can do that." And they went by wa'a, they went by horse, they went by steamship, and they went by their -- their wawae. They walked all over -- all over</p>	Please see General Response.

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		<p>the island chain, yeah, and gathered these signatures for us today. For us today. And the Ku'e petitions, that is their legacy to us. All of us have our ancestors in there. And now they're here. Ancestors are in the house with us, standing proud, helping us to remember. Yeah? That's why we're here. This -- this thing we're doing here, as so many have pointed out, this process not real. This is gaslighting. This is not reality. So I think many of us have already demonstrated that it's more important -- I mean, I guess it's important to make the record for the testimony. But I think what's more important is talking to each other, yeah, is unifying together under this banner of aloha 'aina. Yeah. That's the heart of our culture, aloha 'aina. So your proposed uses do not align with our most fundamental truth, which is aloha 'aina. Yeah? And aloha -- yeah, aloha is only demonstrated through malama. Takes that action. Yeah? The words aren't enough. Yeah? Yeah. Malama is the action of aloha. So you can say you aloha 'aina, but if you don't, malama 'aina, there's a disconnect. It's not real. Yeah. And all of us here, we know that. That's why we standing up. That's why we're here this late. Yeah. That's why people have been doing this, as -- as Brother just mentioned before, their whole life. It's not because they want to do this. I'd rather be at home with my kids and my family. Yeah. But this is our duty. This is our kuleana. This is our sacred kuleana. Yeah? And that's why we're here. And our kuleana is not just responsibility. It's also privilege. So I want to say, I want to repeat that I am honored to be amongst other aloha 'ainas. I am honored to carry my kupunas here to be with your kupunas, yeah, because that's what it's about. Yeah? Hui Aloha 'Aina. Yeah. So I know it's getting late. And, you know, there's still -- how many -- how many more testimonies? [THE MODERATOR: We have about 15 -- we have a bunch more, so, yeah.] A bunch. Okay. So I will wrap it up. But again, I'm going to repeat what I offered on -- was that Tuesday? And several folks have spoke to it. This process, even -- you know, if you could just insert some --- something real into it, the least you can do is to make more time. Yeah? To make more time. Yeah? And -- and I -- my son was at Kahuku last night, and he</p>	

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		<p>mentioned that a kupuna had brought up just the fact that we're having to testify to you, it kind of says the -- that -- that's the truth of it. That is not right. Something's wrong here. Yeah. We're the descendants of -- of this land. Yeah? It's beyond ownership. The land owns us. Yeah? Our DNA comes from this 'aina. Yeah? It's -- this is our land. We're a part of this land. You can't separate the kanaka from the 'aina, and you can't separate the kanaka from this culture. Yeah? If the kanaka doesn't have his 'aina, have her 'aina, they can't practice their culture. Yeah? Our culture is all about the land. No more land; no more kanaka. So this is an opportunity for you guys to do the right thing. Yeah? But we know that this scoping meeting here, this review process for the DEIS, is not going to change anything. Yeah? We know what it's going to take, because we've seen Kaho'olawe. Yeah? We know what it takes. It takes us to come out en masse. It takes us to put our bodies on the front line. Our kupunas -- just like at the mauna, our kupunas led that struggle. Do you know how many kupunas were -- had, like, all kind of medical issues? And they were up there at 6,600 feet, willing to risk their lives to stand on that front line. And that's what you're dealing with. We will go to the top of the mountains. We will go to the ocean. We will go wherever we have to go. And like Brother said before, this is unwinnable. Yeah? Unless you wipe us out completely -- which, I guess, is the plan in Palestine -- unless you wipe us out completely, we're not going to give up. To the last aloha 'aina. So I want to leave you with this -- this short oli from a very special man. Kumu John Lake shared this oli with me. I was lucky to -- to know him and to spend some time with him. Too short of a time. Eia Hawaiiinuiakea Hawaii Nui, Hawaii iki, Hawaii loa, Hawaii Poko, Hawaii luna, Hawaii lalo, I loko o ka moana Kanaloa. Ue ka lani, naue ka honua, ne'e ka honua, ola'l ka honua, ho ola ka honua, kuo ka wailua o ke kupuna, kupaa ke kanaka maoli, tihe maoli ola, tihe maoli ola, tihe maoli ola. Mahalo.</p>	
Kaiehu Helelā		<p>All right. Aloha kakou. I would like to first mahalo everybody for being here and mahalo everybody -- every strong voice that has spoken. I would also like to mahalo my kupuna for being the reason</p>	<p>Please see General Response.</p>

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		<p>I'm here and for standing on my shoulders and giving me the strength to speak. O Kaiehu Helela ko'u inoa, 'umikūmāiwa o'u Makahiki. My name is Kaiehu Helela, and I'm 19 years old. I testify before you as one of the many youth that strongly oppose the renewal of this lease and the continued illegal occupation of Hawaii. To begin with, I'd like to express our dread in the future of Hawaii. You have created an environment where kids are unsure of their future, of their culture, of their identity, and of their safety. So many Hawaiians have lived and still live in poverty. And to those that do, they are barely scraping by, as the military is pricing out my worse as time goes on. Now, I know you military want to slowly kill us off, and I know that's your ultimate plan and has always been. But I want to ask you this. How do I raise a family in this regime we live in? How can I bring somebody into this world where they will die just trying to exist? My ancestors suffered because of you; my ancestors starved because of you, and my ancestors died because of you. They did all of this in the hopes that we would have a future. But you will be taking away this future. Will I have to die because of you, too? It is no secret that Ameri-KKK-a loves using and killing off cultures for its own gain. It's happened since its very conception, and it has been happening across the world today. The only beneficiaries of the military staying here is the military and the U.S. You have zero interest in Hawaiians, and as someone before me said, the fact that we are the ones that have to testify to you is the very evidence, the only evidence I need. I know this will likely fall on deaf ears on your side, but I speak to you -- but I speak to you, my people, to say that as Uncle before me said, we, the future generations, will carry the fire. We will carry our ancestors rage, and we will carry Hawaii into a future that is for us and not you. A'ole renewal, a'ole military, a'ole America.</p>	
<p>Shannon                      Pōmaika'i                      Hennessey</p>		<p>I strongly oppose this Proposed Action and any other actions that would enable the U.S. military to retain 6,322 acres of stolen Hawaiian Kingdom lands. Military presence has caused extensive damage to our environment and threatens our precious natural resources like our water. Moreover, the U.S. military has no</p>	<p>Please see General Response.</p>



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		<p>accountability to properly care for this land that they "lease" at an egregiously low cost. Given that these lands were initially seized illegally, Native Hawaiians are more than entitled to land back. E mau ke ea o ka 'āina i ka pono.</p>	
Beth Herrmann		<p>Hi All, Thank you for taking the time to read my comments and consider them. I have been a frequent visitor to the Hawaiian Islands and have family that lives on the Island of Hawaii. I am concerned because the Army admits to harming the land and environment in the Draft EIS. They admit there will be "significant adverse impacts" on land use (land tenure) and environmental justice with the retention of any lands at Kahuku, Poamoho, and Mākua. The Army does not commit to clean up these lands until after the EIS is finalized, and vague terms in the 1964 leases do not require future clean up actions. The U.S. military has a history of returning Hawaiian lands in a very damaged state with no signs of life, i.e. Kaho'olawe.</p>	<p>Section 3.6.5 revised to clarify that the entirety of the State-owned land enclosed by the fence east of Farrington Highway at MMR, 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. Until lease expiration, or designation of certain areas of the State-owned land as "closed ranges," MEC on State-owned land at MMR will continue to be managed under the MMR SOPs.</p>
Beth Herrmann		<p>The lands in Mākua, Poamoho, and Kahuku are home to dozens of endangered organisms found nowhere else in the world. The Draft EIS underestimates the impact of noise and other training activities on native species, providing insufficient evidence for its conclusions.</p>	<p>Additional noise studies that address impacts on native and protected species have been added to in Section 3.3.5 and 3.8.5.</p>
Beth Herrmann		<p>Additionally, the Kānaka Maoli never relinquished their rights to these lands and their sovereignty over them was never extinguished. The Admissions Act (a federal law) set aside these stolen lands to be held in a public trust for five purposes including the betterment of the conditions of native Hawaiians as defined in the Hawaiian Homes Commission Act, 1920. These Hawaiian Kingdom Crown and government lands were taken without consent or compensation. These leases were awarded to the U.S. Army for only \$1 for 65 years. The 65 years are up, the lands need to be returned to the Hawaiian people.</p>	<p>Section 3.2.4.1 discusses public trust lands, the events of 1893, and the Apology Resolution in 1993.</p>
Beth Herrmann		<p>There hasn't been full disclosure of military activities on leased lands and adjacent federal lands. The Army's restrictive cultural access policies hinder Kānaka Maoli cultural practices and access to</p>	<p>Section 1.1.2 of the EIS describes military activities on State-owned lands. Military activities on Federal lands are outside the scope of this EIS.</p>

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		<p>numerous historical and sacred sites at these "training areas." The DEIS fails to address long-term impacts of limited cultural access to these lands. The DEIS minimizes the impact on cultural practices and historic sites, focusing only on state lands, and not considering the broader cultural and historical context. This is a large oversight that needs to be corrected.</p>	<p>The CIA (Appendix B) assesses the impacts on cultural practices within the broad geographical area, which is greater than the SOL.</p> <p>The Army has no record of denying requested access if safety protocols are followed. The Army's cultural agreement documents at this link provide more information:  <a href="https://home.army.mil/hawaii/garrison/dpw/cultural-resources">https://home.army.mil/hawaii/garrison/dpw/cultural-resources</a>.</p> <p>OEQC guidelines recommend a geographic extent beyond the identified or typical boundaries of the project area for Cultural Practices, which is defined as an ROI of a one-mile buffer around the State-owned lands (see Section 3.5.3). NEPA and HEPA do not require the ROI to extend outside the geographic project area of the Proposed Action for Historic and Cultural Resources, thus the focus on State-owned lands plus a 100-foot buffer (see Section 3.4.3 of the EIS).</p>
Beth Herrmann		<p>The presence of military personnel exacerbates housing competition, decreasing the availability of affordable housing and impacting local residents, adversely impacting local residents and contributing to the displacement of Kānaka Maoli. Native Hawaiians, Kānaka Maoli, are the #1 unhoused population on the islands of Hawaii. The DEIS does not assess the impact of continued military operations on an island already facing a housing crisis.</p>	<p>Sections 3.11.5.1, 3.11.5.2, and 3.11.5.3 discuss KTA, Poamoho, and MMR socioeconomic conditions, respectively. These sections discuss the housing supply for the three areas and note that demand for these areas shows a deficit. Additionally, the sections note that the alternatives would not result in population and growth impacts, and therefore there would be no new impacts on housing.</p> <p>The Socioeconomics subsection in Section 3.12 (Environmental Justice), which includes housing, notes this would not disproportionately and</p>

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			adversely affect communities with environmental justice concerns under the Proposed Action. Section 3.12 has been revised to state that housing deficits do generally disproportionately affect Native Hawaiians. This impact would not be exacerbated by the Proposed Action because it does not involve any addition of military personnel to Hawai'i.
Beth Herrmann		The DEIS fails to address the cumulative effects of military training on both state and federal lands. Hazardous substances on federal lands pose a risk to state lands and surrounding communities. The Army's cleanup commitments are limited by economic feasibility which may leave contamination unaddressed, as has happened in the past. Thanks you for your consideration,Beth Herrmann	An ROI is defined for each resource area analyzed in the EIS; in the case of Hazardous Materials and Hazardous Wastes, the ROI is a 100-foot buffer around State-owned lands. In addition, Section 3.6.5 discusses relevant environmental contamination investigations and monitoring that have been conducted on and around the State-owned lands to detect any migration of contaminants, including those sourced from Federal property. Text added to Section 3.6.6 to identify the cumulative impact of contaminants from munitions use and corresponding cleanup actions.
Sherry Hester	Ulu Lahui Foundation	These places in question all contain significant cultural sites and hold sacred value for Native Hawaiians, the aboriginal peoples of Hawaii. The sites need to be returned to the people of the state of Hawaii and need to be cleaned of ordnance and contaminants. The land and surrounding oceans of Hawaii are precious and limited. It is outrageous that these lands have been leased for only \$1 per year when the Native Hawaiian peoples are houseless and dying in poverty. Return the lands, clean them up, make reparations and restore the life to our lands.	Please see General Response.
Alyson Hiapo		Aloha my name is Alyson Hiapo. Subject: Testimony ----- --- I do not support the the lease renewal optionsl of Makua Valley, Poamoho and Kahuku training to the Army in 2029 when the current lease expires. The EIS provided by the Army was long and	Please see General Response.

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		<p>wordy with instances of incorrect information and perhaps information that has been omitted. There is very little transparency in this EIS. The Army fails to answer the following questions that I have serious concerns about. HOW ARE YOU/ARMY NOT IMPACTING:(see below) 1. rights of the Department of Hawaiian Homelands to water and land for their beneficiaries 2. Other traditional and customary practices? 3. The flora and fauna of Mākua Valley and neighboring land &amp; waters, and the other leases to expire in 2029? 4. The Native Hawaiian Rights (HRS 7-1)? 5. Native Hawaiian rights under Kingdom law to land, healthcare and fishing? 6. The rights to subsistence resources and activities? 7. The right to self determination? 8. The right to self government? 9. The right to ones own culture &amp; customs including language &amp; religion. I am excited as ideas are filling my mind with the possibilities of what Makua would look like once the Army leases are returned to Kanaka. I invision a place for educational opportunities such as aina based learning for our keiki. In regards to FOOD SECURITY: Farming potential for growing more of our food, less import so that we may bring down the cost of food in Hawaii and to be able to protect ourselves in volatile situations due to unstable countries. Career opportunities-potential for career pathways for our future generations to learn from the ‘aina and technology so that we sustain our Hawai’i, insuring safety and security for our state and country by developing future leaders of our youth. Sincerely, Alyson Hiapo</p>	
Alysn Hiapu		<p>Aloha mai kākou, o wau o Allison Hiapo ko’u inoa, noho au ma Ko’olaupoko mai au – no Ko’olaupoko mai au, noho au ma Lualualei. I Kāko’o everything that was said previous to me, so I try not repeat it. What I am thinking about is I got excited when I learned 2029 being when we thought the lands return back from the military to the Hawaii State, to the people. I started thinking what can we do with Makua Valley? . . . . I thought, oh, education. Wouldn't it be awesome possible pathways for our youth or keiki? I thought, oh, agriculture. Oh, man, what can we grow there? What -- more food. Then I thought of food security, which is a big issue</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>nowadays and probably going forward with our climate change getting worse. . . . . So possible new career pathways, more jobs.· Again, regarding the food where we turn more into agriculture land, so that we produce more food for the islands by our people. . . . . Housing.· I thought also about the housing crisis that Hawaii is having.· That's another possibility.· Oh.· My mind just going wild, just going rampant with all these different possibilities. . . . . So my view is, I'm thinking we are going to get back the land when the lease is up in 2029. Next step is what do we see for Makua Valley?· . . . Oh, and by the way there is another option we can offer you, give us the money back to clean up the place for you.· Mahalo.</p>	
Aram Higa-Parker		<p>I'll keep this prompt, as a Hawai'i state resident, I believe that the US military occupies more land than is necessary for its operations. It could be used for better purposes and therefore the military shouldn't be allowed to use it anymore. Demilitarization is our only survival.</p>	Please see General Response.
Brailey Hirose-Hulbert		<p>To Whom It May Concern:        Aloha e,        I submit this public comment in strong opposition to retaining and extending the leases for Army Training Land Retention (ATLR) in Makua, Poamoho, and Kahuku. The proposed retention of the occupied lands for US Army and DoD use maintains an imperial relationship proven disastrous to the ecosystems and the sentient life of this island. I strongly affirm the "No-Change Alternative" which would see the completion of the current lease and return of these lands specified in 2029.        The US military needs to go home. The human and non-human communities (and ecosystems accompanying them) have never, and will never benefit from the presence of US military on Oahu or this pae'āina. Our lives, our island, our ocean, our climate and our planet literally do not have the time left to accommodate this kind of land use.        In earnest,        BHH</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
<p>CHAUNCEY HIROSE-HULBERT</p>		<p>To Whom It May Concern:</p> <p>Aloha e, I submit this public comment in strong opposition to retaining and extending the leases for Army Training Land Retention (ATLR) in Makua, Poamoho, and Kahuku. The proposed retention of the occupied lands for US Army and DoD use maintains an imperial relationship proven disastrous to the ecosystems and the sentient life of this island. I strongly affirm the “No-Change Alternative” which would see the completion of the current lease and return of these lands specified in 2029.</p> <p>The relationship the people of Hawai’i maintain with the US military is unsustainable. It is a mediocre steward, and a physically disabling institution. I refer to the US military because differentiating the Army or DoD from the US military as a whole, for the purpose of this draft EIS, is unhelpful. It renders the reality of historical continuity and responsibility inaccurate and dismissed. The US military is unable to effectively evaluate the damage it has done, disables our people, and decreases the security of all who live here. The work and pathway of Mālama Mākua to end live-fire training has proven in the 2001 legal settlement that the Army and DoD cannot even measure the degradation to environments it’s historically managed, let alone prevent further destruction. An institution like this cannot be allowed to manage this land further, our ecosystems simply can’t sustain the proposed and continued uses in this draft EIS. Further, is the disabling of civilian and enlisted families by jet fuel leaking into our freshwater systems from the military fuel storage facility in Kapūkakī. Headaches, rashes, behavioral issues in children are all from the passive exposure of this leak. Now consider the deliberate physical and mental damage occurring daily to enlisted people when Makua, Poamoho, and Kahuku are used for training. Both passive and deliberate, these events are preventable, and deadly,</p>	<p>Please see General Response.</p>

Commenter	Submitted By	Comment	Response
		<p>to our communities. There is no greater adverse impact than preventable death. Finally, this process to extend these leases comes concurrently with the US military opening new bases throughout Japan and Korea, creating cultural exchanges and base expansions in the Philippines, and allying with Israel, currently enacting a genocide. The inevitable future of the US military's warmongering will increase and invite deadly impacts to life and infrastructure here. Do not further contribute to this military buildup by extending the Army and DoD training on this land; allow the leases to be completed in 2029. The US military needs to go home. The human and non-human communities (and ecosystems accompanying them) have never, and will never benefit from the presence of US military on Oahu or this pae'āina. Our lives, our island, our ocean, our climate and our planet literally do not have the time left to accommodate this kind of land use. Sincerely, and with urgency, Chauncey HH</p>	
Nate Hix		<p>Please do not renew the leases. Military presence has a large negative impact on the local population, as one in three households experiences food insecurity. We need to ensure that our local population is well taken care of before we open our doors up to visitors.</p>	<p>Please see General Response.</p>
Zee Holoholokūlani		<p>I'm not going to be as powerful as Uncle Sparky and Auntie Nani.· You guys was right on.· Sorry I wrote this as I was coming here, so I - - anyway.· . . . . My name is Auntie Zee, Ziona Naho'oikaiko Holoholokulani.· I am an Army brat.· My father was a retired sergeant major.· My mother was Hawaiian.· . . . . Many of the military raped our women over here, just to let you know and remind you of what you guys do over here.· Okay?.· I'm going to say that first.· . . . . You pilau, exactly, exactly.· Everybody heard that one.· . . . . Okay.· Anyway, my dad was with the 264 Army Band, Royal Hawaiian Band, and the Honolulu Philharmonic Symphony.· We were lied to all my life, 75 years' worth.· The military, today, has done more than \$2 trillion worth of U.S. damage in Hawaii to our drinking water, our land damage, with live ordnances still left behind.· That needs to be cleaned up and -- and cleaned up.· . . . .</p>	<p>Please see General Response.</p>

Commenter	Submitted By	Comment	Response
		<p>Ocean water damage, with whales and fishes dying because their explosions so that they can do their war games in Pacific, which they are doing today. They were not even ready to deploy when they were desperately needed in Lahaina. Where the fuck were you guys? Sorry. That's how pilau you guys are. You proved to be pilau, good for nothing. . . . Building golf courses, expensive homes for generals while our native kids and our neighbor Hawaiians are still homeless, living in cars while going and attending schools in Hawaii. Selling lands that not yours to sell to foreigners. You have proven to be untrustworthy. . . . And killing your own military families in Hawaii at Red Hill. So shameful. You guys are so shameful. So end your military leases because you do not deserve to be here at all. Aloha.</p>	
Guy Holt		<p>No treaty, no annexation. Just white lies coming from pilgrims who got kicked out of the U.K. go back were you came from and make problems there instead. You were never wanted here in the fiest place. Lost pilgrims find your property in the U.K.</p>	Please see General Response.
Kanoelehua Hook		<p>Aloha kākou.                      I absolutely do NOT support the renewal of any military leases on Hawaiian land. Our sacred cultural sites have not been protected, the health of our 'aina and wai have been violated and our Hawaiian people have been kicked off their rightful lands (illegal annexation) due to these leases. Absolutely hewa. In kindergarten our keiki learn what you need to survive- WATER, food, shelter..... and you have taken that from us! Land back now!</p>	Please see General Response.
Georgia Hoopes		<p>Mahalo.                      Kānaka Maoli never relinquished their rights to these lands and their sovereignty over them was never extinguished.                      The Admissions Act (a federal law) set aside these stolen lands to be held in a public trust for five purposes including the betterment of the conditions of native Hawaiians as defined in the Hawaiian Homes Commission Act, 1920.                      These Hawaiian Kingdom Crown and government lands were taken without consent or compensation.</p>	<p>Section 3.2.4.1 discusses public trust lands, the events of 1893, and the Apology Resolution in 1993.</p> <p>The land tenure impacts in Land Use and Environmental Justice (Sections 3.2 and 3.12 of the EIS, respectively) acknowledge the lease price for the current leases. If leases would become the land retention method for the State-owned lands, the Army has stated that they would, in</p>



Commenter	Submitted By	Comment	Response
		<p>These leases were awarded to the U.S. Army for only \$1 for 65 years</p>	<p>coordination with the State, provide a fair-market value for the leased State-owned land. The EIS has been revised in Sections 2.3, 3.1.3, and Appendix G to add the assumption that a new lease or fee simple title 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>
Kathleen Hoppe		<p>My comment can be summed up by stating that I am in opposition to any military retention of any lands in Hawai'i at all. It is a disgrace that families were ever forced, by gunpoint, to leave their homes so the military could abuse the 'āina while training for warfare. The fact that it was at a cost of \$1 for 65 years is horrific. To abuse 'āina is disgusting, but at a cost of \$1 truly shows how much the government cares about the environment, the people of Hawai'i, and their past promises to be gone and clean up after themselves. The environmental impacts promise to be significantly detrimental, yet another reason to clean up the valley and not renew the lease at all. The Hawaiian people, our communities, clearly do not want the military to retain these leases and I stand with them in opposition to any retention of the lands whatsoever.</p>	<p>Please see General Response.</p>
Tressa Hoppe		<p>The US Military lease should NOT be renewed on any land. I myself am a PhD student in Botany, have worked in Conservation since 2018. I worked w/ Army Natural resource program and have seen the good work they do--they are not military, we (conservationists) Already have to clean up the military's messes it would be nice if they stopped making these messes. The Army has caused incalculable environmental damage, <u>introduced CRB &amp; chromolaena odorata, CRB in particular have &amp; will continue to cause damage to important food &amp; cutltural crops, as well as potentially causing the extinction of an endemic palm genus-- loulou/Pritchardia.</u> The continued ecocide of the US Military in Hawaii cannot go on. Extinction is forever, the US Military is the</p>	<p>Efforts to minimize the spread of and control of invasive species is described in Section 3.3.5, including efforts from USAG-HI Environmental Division's Conservation Branch, Army Natural Resources Program O'ahu (ANRPO) staff.</p>

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Tressa Hoppe		<p>biggest fossil fuel emitter on earth. A gun has no purpose but to kill-                      -The Military is a Gun.</p> <p>Aloha. My name is Tressa Hoppe. I'm not Hawaiian, but No makaha mai au. This place built me, made me who I am today. And auntie was up here earlier and was talking about how, you know, it's still not really even an apology from the military and it made me think of a quote from Malcom X. If you stick a knife in my back in nine inches and pull it out six inches, there's no progress. If you pull it all the way out, that's not progress. The progress is healing the wound that the blow made, and they won't even admit the knife is there. . . . . So that's sort of something to think about through this whole thing and for context, I am working on a PhD in botany at the University of Hawaii at Manoa, so I'm going to focus on a lot of the environmental stuff because that's what I know best. . . . . I've actually been able to work and actually still am. I'm going into work tomorrow with the Army Natural Resource Program on Oahu, which is composed of, like, community members, local people cleaning up the Army's messes. We're funded because the Army got sued, and it's a great job. I'm so fortunate that I get to see Makua, that I get to go into these places, but it shouldn't be a privilege. Everybody should be able to access their natural resources. Everybody should be able to hear an elepaio singing, but there are so many of our keiki who don't even know that any of that is up there because all they see is haole koa and guinea grass and all that fire risk, and they don't get to see Hawaiian nature. Like, they don't get to see the things that all of these mo'olelo are about, and I think that that's a real shame. . . . . And there is mention that it could be, you know, a problem for natural resource funding cuts with the loss of this land. And I say, you know, we'll make it work because I know every single person in this room is committed to this aina, is committed. . . . . And just wrapping it up superfast, when it comes to environmental protection the military is not great on it either. Again, we're cleaning up their messes all the time. CRB introduced 13 years ago at Hickam. Chromolaena odorata, devil weed, extremely noxious weed introduced by the military. The brown tree snake, which has</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>completely decimated Guam's native bird population, was introduced by the military in the 1940s. . . . There's a 2.3 -- \$2.13 trillion military budget in 2024. That's just this year. And, for context, I had to do this math and despite being a PhD I'm not that good at math. 2.3 trillion is 230,130,000,000 and there's a -- a billion is a million -- it's, for context, 2,130,000 in one year of population -- or of military funding. Approximately 10 million of that is spent on natural resources in Hawaii and that's .00004 percent of their funding. . . . So we need to prioritize our environment. We need to prioritize our aina, and most importantly, we need to listen to our kamohoali'. I thank you.</p>	
Ethan Hoppe-Cruz		<p>I'm Ethan. I'm from here. I'm from Makua. People have talked about becoming diaspora, I'm Chamorro, and haole. My mother came here. I work for Oahu Army Natural Resource Program. It's a part of the -- the Department of Public Works Environmental. . . . I don't represent them when I say this, but it's a sentiment that is shared among my co-workers. The U.S. Army is not conserving land effectively. They are the single largest contributor to global greenhouse gas emissions, and I've walked flames consume Makua, consume Ohikilolo, below Ohikilolo and into Kea'au and -- and I've known, and I've seen the skeletons in Makaleha, in Kaluakauila KTA, Kahuku Training Area, all of these native plants, native ecosystems, native histories just decimated. Decimated by military occupation. . . . So I'm -- I'm opposed to this EIS. The --the word environmental in -- in IS, it's ridiculous. The -- the U.S. Military does not have any -- any --- any ability to say anything about environmental or what is environmentally good, what is environmentally friendly. . . . And the -- the offsetting programs that they have, like, OANRP, bullshit. Like, genuinely. I'm -- I'm so lucky I've seen so many beautiful places, but it's -- it's bullshit, genuinely. Like this 2,000 page EIS -- is that my time or is that halfway? Oh. Got it. So that's -- that's the first part, and I'm opposed to America. So I'm opposed to the EIS, and I'm opposed to America. America is occupying so many places. Someone said it earlier. It is a global force. It is a force that carries out the whims</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>and wills of the top, the elite, the -- the wealthy, the owners at the expense of everyone else. And everyone else is catching wind of it. In the Philippines, in Palestine, everywhere. Revolution is spreading and revolution is coming, and it's coming for America's head. So thank you.</p>	
Mark Hori		<p>I feel the State of Hawaii should not renew the lease for the Army Training Lands on Oahu. They do not respect their neighbors surround the base by flying at late hours of the night and early mornings (11pm to 2am). The helicopters are loud and fly directly over our homes. They rattle my windows and cabinets. They even wake our sick children in the night while they are trying to get rest. This is totally unacceptable especially since they have so much open fields they can fly over instead of our residential homes. If the Army cannot hold themselves accountable and take ownership of their wrongdoings, they do not deserve to use our State lands for training because they do not respect us as neighbors. It makes more sense to fly over open fields than over residential areas just in case of malfunction or something falling out of the aircraft. If that were to fall on a home it could be devastating for no reason. Move the flight path NOW.</p>	<p>Monthly training advisories are published to alert the public and neighbors of upcoming training activities that are louder in nature and may be heard outside the military installation. In addition to these notifications, the U.S. Army Garrison Hawaii has established internal policies and standard operating procedures in an effort to minimize training noise and its impact on the community.</p> <p>Information on existing management measures is listed in the "Airspace" discussion in Section 3.1.4 as well as in Appendix J of the EIS.</p> <p>To alert the U.S. Army Garrison Hawaii of a specific noise complaint, please call the Community Concern Line at (808) 787-1528 or send an email to <a href="mailto:usag.hawaii.comrel@army.mil">usag.hawaii.comrel@army.mil</a>.</p>
Kaimi Horito	The HI Fade Barbershop	<p>For too long, Hawaiian lands have been disrespected and taken away from native hands. We are struggling as the native people of this land to stay on this land. This is our home but so many of us have been forced to leave due to lack of land. The military occupancy only adds to that issue and struggle. Please let the land go back to the people of Hawaii. The military does not properly take care of the land. This land is sacred to us and needs to be returned. Please hear the people and DO NOT renew the lease of these sacred lands.</p>	Please see General Response.
Kanani Horito		I oppose any renewal of military land lease in Hawaii anywhere. Not only are the US military illegally occupying lands of Hawaii but have been poisoning and damaging aina, culture, wai, karma due to lack	Please see General Response.

Commenter	Submitted By	Comment	Response
		of respect and accountability. Do not continue occupying these lands in this way. You're harming our land and people. Take responsibility for all the damages and desecration. Think about returning these lands. Mahalo!	
Kimmer Horsen		Dear Sir Commander of Army Garrison Hawaii, I'm a combat veteran, Afghanistan/Iraq and have along lineage of military veterans. It's in the best interest of Hawaiian subjects of the belligerently occupied Kingdom/Country of Hawaii to downsize the personnel stationed here as well as the lands currently belligerently occupied. Perhaps leave a drone unit here of Marines or Special Forces, nuclear space force satellite capabilities if we are threatened with an attack by China, N Korea, Russia, Iran, etc. The Kanaka Maoli have suffered and been injured mentally, physically, spiritually, emotionally for far too long. They have been decimated by disease and held hostage in their own country for far too long. The US Army did not even follow Geneva Conventions. The Queen yielded to the military superiority of the U.S. This is by international law still the HAWAIIAN KINGDOM. ALOHA AINA	Please see General Response.
Kimmer Horsen		Mahalo. Aloha mai kakou, dignitaries, Colonel, and Major -- is that a colonel? Sorry. Your sidekick, right? Okay. All right. I just want to say that you guys can stay here, you know. But I guarantee, since, you know what happened last night in Waianae, you know what everybody's saying here, the consensus here is people are injured in pain mentally, spiritually, physically, emotionally because of the U.S. military. They're on the front lines. Queen Lili'uokalani yielded to the superiority of the military, U.S., but that doesn't mean we're not at war. So I suggest, if you like no haole soldiers go downtown, run into local boys, big Polynesian boys and not get scrapped, I suggest you start somehow working with the Kanaka Maoli here, the Polynesians. I highly suggest you start listening and allowing them to go on a Schofield and clean up and inspect their aina and their burial grounds, allow them access, because you might as well make this one hazardous duty because we are in civil war here. They don't want you here. They didn't want my soldiers. They didn't want our -- my soldiers here, my haole soldiers	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>here. Not welcome. You could stay here, but it is a hostile environment. You bring your domestic violence over here with the soldiers. My classmate was murdered and chopped up and put in one garbage can. This is what the army does now. This is the hewa your -- our soldiers are bringing here. You know what's going on. You're the commander. You get all these reports. I know you do. The military police -- we on Hawaiian time, right? [THE MODERATOR: There's a lot of people waiting to go tonight, please.] Are they combat veterans? [THE MODERATOR: It's just people from the public who would like to speak.] Oh, they're going to speak, aren't they, because we're on Hawaiian time. Just like last night. Because if he likes stay here, he's going to going to know what he's facing, what his troops face when they come out here to the Kahuku training grounds. They're going to know the intel. They're going to do the reconnaissance of the land, the people of the aina here, right? This is what you're facing. Your sex trafficking of the Hawaiian women by the military here, it's a problem. We talked about the youth suicide. We talked about all that last night, to take it seriously. This is serious shit. This is like -- this is, like, war crimes. This is -- this is hostile. This is war. It's hewa. You go back, tell your generals, you tell Biden, you tell all the secretary of defense -- I don't care -- you tell them all how hostile it is here. I know it's hostile here. People -- people here are very calm, but underneath, there's a lot of eha and aggression, a lot of -- I don't want to say hate, bitterness, broken heart. Like Princess Ka'iulani died of a broken heart, because the land is connected to everybody and the people. Once you realize that, you might -- you just might get a light bulb going on in Washington back in the Pentagon. Mahalo and aloha.</p>	
Kimmer Horsen		<p>Mahalo. He's really good at cleaning, isn't he? All right. I just want to say, you know, a lot of us, we blame the Army. Yeah? But a lot of us, we work for the State of Hawaii, too. We work for the federal government. Right? So we are sellouts ourselves. Right? So I want you come up here, dissing the flag that my comrades died for. Okay? Got it? Yeah. Air force. All you do is fly planes and --</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>around. All right. Enough of that. Sir, were you here during the Lahaina fires? And, ma'am? Okay. That's even worse. Now, the point I want to make today is that why, during those fires, 12,000 people were displaced, and the Army just sat here training, while 102 people died. A whole ohanas were obliterated by the fire, and the entire city gone. Why was the Army, Wheeler, and Army garrison and Shafter just sitting on their asses or out there in the jungle running around playing war while people are dying in Lahaina? Whole city burning down. The only thing that saved them was Kanaloa, the ocean. We are sick of the US military. I am. I'm sick of it, too. All we are is hostages. We're all hostages here. All us native peoples, the Micronesians. Nuclear hostages. Nuclear. Radioactive. Hapa. You are the worst one. You are the biggest traitor. I worked for a task force commander in Afghanistan. I know what their -- provost marshal comes in and reports to them every day every little crime that happens, all the rapes, all the barracks rapes, all the crime, all the --- all the domestic violence complaints, all come to him. And her. Will come to her. Do you work those? Do you schedule his calendar? No. So you have no idea, do you? During COVID we stopped training, though. When it's our backs, when it's us, when it's our soldiers, yeah, we're going to stop training. We're going to stop -- we'll stay in our house, put our mask on, be good. Right? But when you have people dying in our neighbor island, we all just sat over here. Whose call was that, sir? Was it yours? Right? Not your fault. Nothing's your fault. That's the shit I'm talking about. You guys, everybody here, you all have to take responsibility. What is pono, and what is not? Is it a lawful order, or is it not? That's what it comes down to. Is it lawful for the United States military, for the state of Hawaii, to be here, for America to even be on this island? Is it a lawful order? You think about that. Because it's a war crime. Don't forget it.</p>	
Trevor Howard		<p>I hope this message finds you well. I am writing on behalf of the residents of Kahuku to address our concerns regarding the recent and upcoming lease renewal to continue to conduct exercises conducted in our area.</p>	<p>Section 2.3.4 considered an alternative (Alternative 9) that included relocating Army training activities elsewhere. This alternative was ultimately dismissed because training at other</p>

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		<p>While we understand the importance of such exercises for the preparedness and effectiveness of our armed forces, the impact on our community has been significant. The noise, disruption, and safety concerns have been a source of stress and inconvenience for many residents. Additionally, the presence of military operations has raised concerns about the well-being of our local already endangered environment and wildlife.</p> <p>Given these issues, we kindly request that you <u>consider relocating these training exercises to a less populated area</u> where the impact on civilian life and the environment would be minimized. We believe that there are other suitable locations across the island where training could be conducted without causing undue hardship to our community, given the extensive land available for military use in Hawaii.</p> <p>We greatly appreciate the service and dedication of our military personnel and hope this request can be accommodated for the good of our community.</p>	<p>areas in Hawai‘i would be constrained and vital training features would be lost. Text regarding this alternative has been clarified accordingly.</p>
Ivy Hsu		<p>I am writing to strongly advocate for the U.S. Army to choose the option of ending their leases on the lands at Makua Military Reservation, Kahuku Training Area, and Kawaihoa-Poamoho Training Area on Oahu. As a concerned citizen, I believe this decision is not only prudent but also necessary for several compelling reasons.</p> <p>Firstly, the leases for these lands, initially signed for \$1 in 1964 and set to expire in 2029, represent an opportunity for the Army to fulfill its obligations with respect to environmental stewardship and community well-being. The military's continued use of these areas, while crucial for training purposes, has had longstanding negative impacts on the local environment and communities. Areas like Makua have suffered environmental degradation, impacting native flora and fauna, due to military activities. Ending these leases would allow for the restoration and conservation of these valuable ecosystems, contributing to the preservation of Hawaii's unique biodiversity.</p> <p>Secondly, there is a pressing need to address the concerns of local communities, particularly those advocating for Hawaiian</p>	<p>Please see General Response.</p>



Commenter	Submitted By	Comment	Response
		<p>sovereignty and cultural preservation. The lands in question hold significant cultural and historical importance to Native Hawaiian communities, who have expressed their desire to see these lands returned for community use, education, and cultural practices. Ending the leases would signify a meaningful step towards reconciliation and respect for the rights and aspirations of the indigenous people of Hawaii.</p> <p>Moreover, the economic and social benefits of repurposing these lands for community use cannot be overstated. By relinquishing control of these areas, the Army can pave the way for sustainable development initiatives that benefit local economies, provide recreational opportunities, and enhance the quality of life for Oahu residents. These lands could be utilized for affordable housing projects, renewable energy installations, or educational facilities, thereby serving broader community needs that are increasingly urgent in Hawaii's current socio-economic landscape.</p> <p>Lastly, from a strategic standpoint, the Army has alternative training facilities available, such as Pohakuloa on Hawaii Island and Schofield Barracks on Oahu, which are equipped to meet operational requirements without the need for continued extensive use of these leased lands. The Army's own assessment in the draft Environmental Impact Statement (EIS) acknowledges the potential for mitigating impacts on training missions through alternative arrangements.</p> <p>In conclusion, I urge the U.S. Army to consider the long-term benefits and moral imperatives of ending their leases on the lands at Makua, Kahuku, and Kawaihoa-Poamoho. Doing so aligns with principles of environmental responsibility, cultural preservation, community empowerment, and strategic operational efficiency. It represents an opportunity to forge a path forward that honors the interests of all stakeholders and ensures a sustainable future for Hawaii's precious lands and its people.</p>	
Zelia Huerta		<p>I had the most amazing experience with Manta rays here and witnessed a thriving ecosystem. I fear that further development in this area will harm this delicate habitat. I'm asking that this area be</p>	<p>Please see General Response.</p>

Commenter	Submitted By	Comment	Response
		left as is. Thank you, Zelia Huerta	
Makanoe Hufana		Aloha. My name is Makanoe, and I am a proud descendant of the native people of these islands. Today, I am here because my -- well, my journey really started -- my kumu is sitting in the back over there, Kaleolani Hanohano. She is the reason why I stand here before you. She was the person who woke me. And I would like to say I reiterate everything I said last night. You have my paper. I would like to say, though, November 1888, King David Kalakaua said his final words to the Honolulu Magazine. And he said: Tell my people I tried. These were his last words to us, and these are my last words tonight as the kupuna to the next generation that's sitting over there behind me -- oh, wait, they went leave. Anyways, to the next generation, this is us fighting for you. This is our try to give you a future. When they say history is about the past, it's about ancient debris, it's about dates, it's about times, it's not about the dates and the times and all of that. History is a dialogue between the future and the past. So when we stand here and we tell you these events that happen within our past, we have a way of looking at time as we look to our past to know how to move forward. So when you look to your past and you see what's happened, what would your forefathers do if they were in this situation? Would they leave? Would they tell their people: Hey, this isn't cool. If the British were to say: I'm gonna to bomb this place, I'm going to use this place to train, I highly doubt that America would take that, right? So why would we? Mahalo.	Please see General Response.
Makanoe Hufana		My name is Makanoe. I have a question that I would like answered. During the cultural impact assessment, did you have any archaeologists or anthropologists on-site? I'd like a response. [THE MODERATOR: It's one-way, for these. Sorry. It's the rules.] Did you have anyone with archeological background doing the cultural impact assessment? I would like to request for a new cultural impact assessment, because the cultural impact assessment has many holes in it. No disrespect to whoever did that cultural impact	The Cultural Impact Assessment has been completed in accordance with OEQC guidelines and will not be re-opened at this time.  EIS Chapter 6 includes the list of preparers. CIA Chapter 2 describes the methods and procedures implemented to prepare the CIA. Comment provided during the public meetings and

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		<p>assessment, but there were lack of interviews from those from the community that are actually able to speak about the community.· You are missing mo'olelo. And above all else, considering you did not answer about the archaeologist and the anthropologist being on-site during this cultural impact assessment, I would like that cultural impact assessment to be redone, with more than 10 interviewees of kupuna who know the mo'olelo. I'd also like that cultural impact assessment to include all of the testimony given throughout all three nights.· And I want that cultural impact assessment to be in Olelo Hawaii and any other language that is needed to be able to comprehend what it means. And I also want all of this information sent back to the House of Representatives, where it should not have been skipped.· And I want it to be looked at, and I want it to be seen as if this is really able to go through with all this opposition. I can't stress enough that the cultural impact assessment is the most important piece of all of this process.· We come here today to speak to you about environment, and our culture is in our environment.· So to better understand the environment assessment, you need the cultural impact assessment, and you need one that is substantial. Thank you.</p>	<p>submitted throughout the public comment period are included in this EIS.</p>
Makanoe Hufana		<p>Aloha. My name is Makanoe Hufana. I am a descendant of Frances Bersosa de Peralta. She is a native here of Makaha, and my family are the caretakers for the heiau at the bottom of Makua Valley.· We grew the kiawe trees that protect it from bad intentions. . . . . The military activities has scarred our lands with bombs and artillery, polluting our air, water, and soil.· The never-ending roar of aircrafts and the presence of great ships disturb the peace of our oceans and our skies, causing harm to our marine life and native birds.· Even driving them to beach themselves in distress from the noise, which you have been aware of since the complaint against the Navy RIMPAC exercise in 2006 with a large beaching marine life during RIMPAC exercises and also, injuries from vessels to marine life resulting in death. . . . . This relentless assault on our environment is not just a violation of our physical space, but an upfront to our cultural and spiritual connection to these lands. . . . . Moreover,</p>	<p>Please see General Response.</p>

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		<p>the military presence in Hawaii reflects the broader pattern of historical colonialism, neglecting to the awareness of this --their history and their crimes against the U.N. and the native -- their national -- the nation of Hawaii. . . . . In these waters and sands, you disregard our indigenous rights. The history of Hawaii is marked by the illegal overthrow of our sovereign government and the illegal occupation of our lands through military and the men that were here from the United States who misused the United States Military because some manchild cried wolf. The continuation of military leases and activities perpetuates this historical injustice and undermines our efforts towards self-determination. . . . . In a time when our islands face unprecedented challenges of climate change and environmental degradation, the military's destructive footprint only makes us aware of these threats and cause for concern. . . . . The limited resources on our island must be safeguarded for future generations, and I think the military doesn't realize this because they have a very large amount of land in the U.S. where you can't see your resources, but we can see ours, and they're disappearing. . . . . Therefore, I implore you to consider the profound implications of renewing these military leases and allowing the continued presence of the United States Military on our sacred lands. Their presence is not only unnecessary, but also detrimental to our collective well-being, cultural integration, and also, our environmental sustainability. . . . . We demand respect for our sovereignty, our culture, and our land, and our natural heritage. It is time to prioritize the voices of na 'ōiwi and for you to listen to us because we were the stewards first, so we should know how to take care of our land, and bombing it is not the correct answer. . . . . Therefore, I urge you to reject the renewal of military leases on Oahu, as well as all of your leases on all of our beloved land. Mahalo. And just in case your ears don't work, I have it written for you.</p>	
Micky Huihui		<p>I OPPOSE the renewal of Army leases at Kahuku, Poamoho, and Mākua. The Army admits to harming the land and environment in the Draft EIS. They admit there will be "significant adverse impacts"</p>	<p>Section 3.2.4.1 discusses public trust lands, the events of 1893, and the Apology Resolution in 1993.</p>

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		<p>on land use (land tenure) and environmental justice with the retention of any lands at Kahuku, Poamoho, and Mākua. Kānaka Maoli never relinquished their rights to these lands and their sovereignty over them was never extinguished. The Admissions Act (a federal law) set aside these stolen lands to be held in a public trust for five purposes including the betterment of the conditions of native Hawaiians as defined in the Hawaiian Homes Commission Act, 1920. These Hawaiian Kingdom Crown and government lands were taken without consent or compensation. The Army's restrictive cultural access policies hinder Kānaka Maoli cultural practices and access to numerous historical and sacred sites at these "training areas." The DEIS fails to address long-term impacts of limited cultural access to these lands. The DEIS minimizes the impact on cultural practices and historic sites, focusing only on state lands, and not considering the broader cultural and historical context.</p> <p>The DEIS fails to address the cumulative effects of military training on both state and federal lands. Hazardous substances on federal lands pose a risk to state lands and surrounding communities. The Army's cleanup commitments are limited by economic feasibility which may leave contamination unaddressed.</p>	<p>The Army has no record of denying requested access if safety protocols are followed. The Army's cultural agreement documents at this link provide more information:  <a href="https://home.army.mil/hawaii/garrison/dpw/cultural-resources">https://home.army.mil/hawaii/garrison/dpw/cultural-resources</a></p> <p>OEQC guidelines recommend a geographic extent beyond the identified or typical boundaries of the project area for Cultural Practices, which is defined as an ROI of a 1-mile buffer around the State-owned lands (see Section 3.5.3). NEPA and HEPA do not require the ROI to extend outside the geographic project area of the Proposed Action for Historic and Cultural Resources, thus the focus on State-owned lands plus a 100-foot buffer (see Section 3.4.3 of the EIS).</p> <p>An analysis of the cumulative impacts of the Proposed Action and combined with past, present, and reasonably foreseeable future actions for all resource areas in Chapter 3. The ROI is determined by each resource area. The Proposed Action addressed in this administrative EIS is a real estate transaction (land retention). Military training is discussed only in the context of ongoing activities and their impacts because of land retention, and no changes in training are proposed. Ongoing training has been addressed through previous NEPA and other planning documents, which included measures to address impacts from training activities.</p>
Angela Huntmer		Re: Draft Environmental Impact Statement (EIS) for Army Training Land Retention (ATLR) at Kahuku Training Area (KTA), Kawaiioa-	Please see General Response.

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		<p>Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O’ahu To Whom it May Concern, I am incorporating the Sierra Club O’ahu Group’s (“SCOG’s”) comments on the Draft Environmental Impact Statement (“EIS”) for Army Training Land Retention (“ATLR”) at Kahuku Training Area (“KTA”), Kawaioloa-Poamoho Training Area (“Poamoho”), and Makua [sic] Military Reservation (“MMR”) on the island of O’ahu (“DEIS”) as part of my own personal testimony. I strongly urge the no-action alternative , i.e. the discontinuation of military retention of the subject lands and the remediation of the cultural and environmental harms that have been perpetrated against these culturally, ecologically, and agriculturally significant areas over the last six decades of military control. We re-emphasize the concerns raised in the joint letter submitted by the Council for Native Hawaiian Advancement citing the extensive “pattern of abuse and exploitation” that has occurred on these lands, and likewise calling for the no-action alternative. I also echo the concerns and comments submitted by KAHEA, as articulated in the talking points available at <a href="http://tinyurl.com/eiskahea">tinyurl.com/eiskahea</a> , and incorporates them by reference Significance assessments should be made based on the no-action alternative, not on existing I am deeply concerned regarding the DEIS’ use of existing conditions to assess the significance of impacts under the retention alternatives. Utilizing current and historical impacts - which have been particularly heightened for the Native Hawaiian and similarly situated communities - as a baseline for comparison obscures or even mischaracterizes the impacts of the alternative actions considered in this analysis .... Accordingly, I support the selection of the no-action alternative, and further urges any future draft of the DEIS to incorporate the many additional considerations raised in this letter and others submitted in support of the no-action alternative. Yours respectfully, Angela Huntmer Kahuku, Oahu</p>	
Angela Huntmer		<p>For example, the housing and traffic impacts arising from the retention of the Kahuku Training Area (“KTA”) are characterized as negligible, as retention would result in “no proposed changes in the</p>	<p>If all the State-owned lands were not retained (i.e., the No Action Alternative), there would be no changes in population, transit, and housing</p>

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		<p>permanent location of soldiers or other training participants. They would continue to live and transit from other locations on O’ahu; therefore, no changes in households, housing, or quality of life at KTA would be generated.” However, this assessment obscures the impacts of the “retention” action(s), as the population, transit, and housing impacts of soldiers and training participants at KTA would not simply “continue” if the leased state lands were not retained. Similarly, the payment of “fair market value” (which is itself an extremely ambiguous and uncertain term) under the retention-via-lease alternatives is characterized as “beneficial” when compared to the current status quo lease rent of \$1. However, such an amount may not necessarily be “beneficial” when compared to the values –financial and otherwise – that could be realized from these lands if no retention action is taken, and the currently occupied state lands are restored and returned to the state. These are just two of many examples found throughout the DEIS that demonstrate the inadequacy of the analysis in the document. Insofar as an environmental impact statement should evaluate the impacts of an action, then the impacts of that action must be evaluated against no action being taken – in this case, the return of the lands at issue.</p>	<p>because the same soldiers would conduct their training elsewhere within the same training areas on O’ahu. Benefits occurring as a result of returning lands to the State are identified as part of the No Action Alternative analysis in Section 3.11.5, which has been further clarified in the Final EIS; what the State specifically chooses to do with these lands is speculative and not part of this analysis. This additional beneficial impact on other values is identified in Section 3.12.5 Environmental Justice.</p> <p>Sections 3.13.5.1, 3.13.5.2, and 3.13.5.2 discuss KTA, Poamoho, and MMR traffic conditions, respectively.</p>
Angela Huntemer		<p>2. The DEIS must assess all cumulative and secondary impacts incident to the proposed retention alternative. It is imperative to assess all secondary and cumulative impacts of the proposed retention action and alternatives. This includes not only the impacts arising from activities taking place on the lands proposed for retention, but all impacts “incident to and a consequence of the primary impact” of land retention. For example, under Hawai’i environmental review law, an environmental impact statement triggered by harbor improvements necessary for the operation of an inter-island ferry should not merely assess the direct impacts of the harbor improvements “in isolation,” but must also assess the secondary environmental impacts of the inter-island ferry’s operations as well. Similarly, an environmental impact statement triggered by the leasing of a public pipeline must evaluate not only</p>	<p>Each resource area in Chapter 3 provides a subsection on the identified ROI for the resource analysis, including the rationale for how the ROI was established. The ROI areas vary depending on the resource area and range from extending only slightly beyond the State-owned land boundaries to all of O’ahu. Addressing impacts from joint training exercises and Indo-Pacific deterrence strategies not relevant to retention of State-owned lands is beyond the scope of this EIS.</p>

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		<p>the impacts of the lease alone, but also of a resort that would be developed as a consequence of the lease. <u>Here, the DEIS in several instances focuses only on impacts from activities taking place on the lands proposed for retention, rather than all secondary and cumulative impacts that would also result as a consequence of a retention action. In one instance, the DEIS provides only a summary assessment of the greenhouse gas emissions from continued training on the lands proposed for retention. It neglects to account for the full range of emissions and climate impacts “incident to and a consequence of” the land retention alternatives, including from joint training exercises and the Indo-Pacific deterrence strategies that has been asserted as dependent upon land retention and training. Accordingly, all impacts that may arise from the Army’s retention of state lands - including impacts from military activities on other lands and waters that would be enabled or facilitated by the retention alternatives – must be assessed by the DEIS and any subsequent drafts.</u></p>	
Angela Huntemer		<p>3. The DEIS vastly conflates and mischaracterizes the environmental justice impacts on Native Hawaiians , including Native Hawaiian children I appreciate the DEIS’ recognition of EO14096, the federal Apology Resolution recognizing the harms of land dispossession on the Native Hawaiian people, and its passing reference to harms that have arisen from the historical and ongoing occupation and use of the “ceded” lands proposed for retention. However, I note that the DEIS fails to adequately identify and assess the many specific harms that ongoing retention in any form may have on the entire Native Hawaiian community as well as on lineal descendants and others with ancestral or customary pilina to the ‘āina in question, including children. Occupying Native Hawaiian lands for military activities – and the restrictions on public access to these lands that accompanies military land uses – is an on-going and deeply traumatizing severing of the relationship between Native Hawaiians and the land of their ancestors. A. The DEIS fails to adequately recognize much less assess health and well-being impacts on the Native Hawaiian community from the retention and continued</p>	<p>Text has been added to Section 3.12 Environmental Justice to further assess impacts on Native Hawaiians. The Army recognizes the adverse impacts to the Native Hawaiian community as it relates to the lost sense of connection to the ‘āina and the associated intergenerational impact for land retained.</p> <p>Impacts on human health and safety (discussed in Tables 3-63, 3-68, and 3-73) as it relates to environmental justice are not anticipated under the Proposed Action, which is administrative in nature. Relevant social determinants are discussed in Section 3.12, and this discussion has been expanded.</p> <p>Benefits occurring as a result of returning lands to the State are identified in Section 3.12.5; what the</p>



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		<p>denial of Native Hawaiian self-determination over “ceded” lands The range of harms to the Native Hawaiian community resulting from the non-consensual and uncompensated dispossession of ancestral lands, including “ceded” and public land trust lands, is very well documented. Three decades ago, the 1993 Apology Resolution recognized that “the health and well-being of the Native Hawaiian people is intrinsically tied to their deep feelings and attachment to the land,” and that “the long-range economic and social changes in Hawai‘i over the nineteenth and early twentieth centuries have been devastating to the population and to the health and well-being of the Hawaiian people.” Fifteen years later, the Hawai‘i Supreme Court acknowledged the deep connection between the Native Hawaiian community and ‘āina, a connection whose loss cannot be remedied by mere monetary reparations: “ Although an argument could be made that monetary reparations would be the logical remedy for such loss, we are keenly aware — as was Congress — that ‘the health and well-being of the [n]ative Hawaiian people is intrinsically tied to their deep feelings and attachment to the land [.]’ . . . ‘Āina, or land, is of crucial importance to the [n]ative Hawaiian [p]eople—to their culture, their religion, their economic self-sufficiency and their sense of personal and community well-being. ‘Āina is a living and vital part of the [n]ative Hawaiian cosmology, and is irreplaceable. The natural elements—land, air, water, ocean—are interconnected and interdependent. To [n]ative Hawaiians, land is not a commodity; it is the foundation of their cultural and spiritual identity as Hawaiians. The ‘āina is part of their ‘ohana, and they care for it as they do for other members of their families. For them, the land and the natural environment is alive, respected, treasured, praised, and even worshiped.” More recently, health scholars have likewise identified the occupation and militarization of Hawai‘i as historical determinants of Native Hawaiian health; determinants that, along with the ongoing denial of self-determination and indigenous international rights, contribute to the many disparate health challenges facing the Native Hawaiian community, including</p>	<p>State specifically chooses to do with these lands is speculative and not part of the EIS analysis.</p>

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		<p>and particularly youth. Such disparities are particularly glaring for Native Hawaiian youth, including: a 10% higher rate of attempted suicide among Native Hawaiian male tenth graders compared to their non-Hawaiian peers; the highest rates of feelings of sadness or hopelessness among Native Hawaiian ninth grade female students (47.7%, compared to 35.4% for non-Hawaiian female students); the highest rates of self-harm among Native Hawaiian ninth grade female students compared to their non-Hawaiian peers (42.2% vs. 33.4%); and a significantly higher rate of anxiety among Native Hawaiian female students in middle school compared to their non-Hawaiian counterparts (1/3 vs. 1/4). In light of the above, the Army’s continued retention of “ceded” lands may foreseeably perpetuate significant adverse impacts on the health and well-being of the Native Hawaiian community. The trauma of such continued dispossession and denial of self-determination over these lands would likely be exacerbated should these lands be retained by the Army, given the overwhelming Native Hawaiian calls for the cessation of military occupation following six decades of abuse. However, the DEIS merely acknowledges that retention of the state “ceded” lands at issue result in a continued “loss of connection” to ‘āina and cultural resources, and the continued frustration of the public land trust (which itself is a largely unfulfilled “monetary” mechanism the Hawai’i Supreme Court has recognized as an insufficient “remedy” for historical injustices). The DEIS fails to provide any specific assessment on how the rejection of Native Hawaiian calls for the relinquishment of these “ceded” lands may impact the physical, emotional, mental, and spiritual health and well-being of the Native Hawaiian community, including and particularly on that of Native Hawaiian children. Moreover, no meaningful analysis is provided regarding the many beneficial impacts, direct and indirect, that may result from the no-action alternative, including through the potential dedication of these lands for Native Hawaiian stewardship and use for rehabilitation, cultural perpetuation, or similar programming, as well as through the process of healing and reconciliation that would be advanced</p>	

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		<p>through the Army’s relinquishment of these lands. The DEIS fails to account for other social determinants of health of Native Hawaiians. Despite the commitment made by both state and federal governments to address the social determinants of health of Native Hawaiians, the DEIS does not appear to employ a social determinant of health analysis beyond its summary acknowledgement of cultural impacts. To ensure a full understanding of the wide range of potential impacts from its proposed action and alternatives, and to fulfill the statutory commitments made on both the state and federal levels, the DEIS must ensure that the unique social determinants of health relevant to Native Hawaiian health and well-being are adequately considered. I recommend reviewing and applying the “Mohala i ka Wai, ka Maka o ka Pua” framework promulgated by Dr. Keawe’aimoku Kaholokula and other health practitioners and scholars, to ensure that the DEIS adequately addresses impacts on social determinants of health including but not limited to those associated with cultural practices and identity, land tenure, housing affordability, food availability, native rights, self-determination, and ‘āina-based education, among others.</p>	
Angela Huntemer		<p>4. The DEIS must assess the adequacy of the proposed action and alternatives to ensure national, regional, and planetary security in the face of the greatest threat humanity has ever faced. Finally, I strongly urge the DEIS to include an assessment of whether any of the current proposed alternatives, including the preferred action, will achieve the Army’s and Department of Defense’s overarching national security mission, and whether alternative approaches would more meaningfully confront the greatest threat to security and survival that humankind has ever faced: the rapid destabilization of our climate. Army General Charles Flynn has stated, as a representative of the Department of Defense, that maintaining the Army’s access to the state lands at issue is required to “defend our nation, our freedoms and our prosperity,” and to “confront our nation’s threats.” According to General Flynn, soldiers must also train in Hawai’i - using these lands - to “deter our</p>	<p>Impacts on and from climate change relative to the Proposed Action, and when combined with other cumulative projects, are discussed in Section 3.7 (Air Quality and Greenhouse Gases). Addressing DoD-wide impacts on and from climate change not relevant to retention of State-owned lands is beyond the scope of this EIS.</p>

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		<p>adversaries,” and to “prepare to defend the nation while also preserving the natural and cultural heritage” of our islands. First, as described at the beginning of this comment letter, all secondary and cumulative impacts from activities that depend upon the retention of the state leased lands must be evaluated in the EIS process. Given General Flynn’s comments, those deterrence and other Department of Defense activities that are dependent upon the retention of these lands - including but not limited to the “joint and multinational training exercises” cited in the DEIS - must be identified and evaluated with respect to their reasonably foreseeable environmental impacts. Such impacts should include those associated with greenhouse gas emissions from relevant activities across Hawai‘i and the Pacific, by the U.S. Department of Defense, its regional allies, and its “adversaries” whose military activities and attendant carbon footprints will foreseeably increase in response. Second, and more importantly, the DEIS should also contemplate whether the preferred retention action will necessarily address the greatest threat to the United States and “our freedom and our prosperity,” along with our planet as a whole: the rapid destabilization of our climate. As countless studies have indicated, without drastic and transformative pivots on a global scale, the devastation that can and will occur would far exceed what even the most powerful “adversary” to the United States could possibly threaten, including but not limited to the displacement of an estimated 1.2 billion people by 2050, life-threatening heat waves impacting three-fourths of humanity annually, chronic agricultural failures and mass starvation on an unprecedented scale, and the extinction of a quarter of the Earth’s macroscopic species.</p>	
Angela Huntemer		<p>In the shorter term, disrupted global supply chains, the chronic inundation of coastal U.S. cities, outbreaks of new and formerly eradicated diseases, and worsening and more frequent natural disasters, would also increasingly undermine the security, freedoms, and prosperity of the United States, as well as erode the natural and cultural heritage of Hawai‘i and numerous other Pacific Island jurisdictions. Notably, the retention alternatives would in</p>	<p>The Proposed Action is a real estate transaction (i.e., administrative action), and no new air emissions or changes in emissions would occur. Cumulative impacts on air quality and GHG emissions in areas outside KTA, Poamoho, and MMR and not contemporary to the Proposed Action are outside the scope of the EIS. KTA Tract</p>

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		<p>many ways exacerbate the vulnerabilities of Hawai'i to climate destabilization, including the cumulative reduction of our long-term food security resulting from the occupation and unremediated contamination of historically abundant agricultural lands, combined with Hawai'i's climate-vulnerable dependence on imported food. The harm to 'āina and Native Hawaiian health and well-being resulting from any retention of the subject lands would also undermine the social cohesion and cultural values and practices that may be the foundation of our islands' ability to navigate the climate crisis. Accordingly, an assessment of the effectiveness and opportunity costs of current military policies and priorities embodied in the preferred retention alternative should minimally be included as part of the DEIS. Alternatives that could actually and meaningfully confront this real and present threat to the United States, its freedoms, and its prosperity should also be evaluated consistent with HEPA and NEPA requirements. Such an alternative may include the development and widespread sharing of decarbonization technology, supportive infrastructure, and other resources with other militaries and civilian populations; concrete benchmarks for the reduction of carbon-intensive training and other activities to the bare minimum, and for the restoration and return of lands and waters to indigenous stewardship; and the continual tracking of the full range of threats the climate crisis poses to the United States and the planet, among other critically needed strategies.</p>	<p>A-1 is the only State-owned land parcel within an agricultural SLUD, and the Proposed Action would not have a measurable secondary effect on climate change-related food security issues.</p>
Sam Ikehara		<p>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 Kahuku Training Area (KTA), Kawaihoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR). I support the "No Action Alternative" that would allow the leases 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</p>	<p>Please see General Response.</p>

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		<p>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. Hawai’i suffers from numerous crises related to housing and food insecurity. The military actively contributes to both with the amount of land and resources that it occupies. The return and remediation of these lands is but one crucial step towards justice and true independence for Hawai’i.</p>	
Kaulana Ing		<p>My name is Kaulana Ing. I am a resident of Wahiawa. I live up in Wahiawa uka, at the top of California Ave, near the Lightning Academy. And I really love this town. My wife's ohana has been here for many generations. I'm lucky enough to have just moved here a few years ago. And, you know, I love that people can have different politics, different opinions, but still come together, talking about the places they love, the lands they love, their favorite streams that we play in. We show up to each other's baby's first birthday parties, check on our older neighbors. I think we have pride in being good neighbors here, and that's one of the things that really brings this town together and one of the reasons I'm so proud to live here. And we try to bring that into our own home as well, into our living room. You know, I'll share a story, that just -- just a few months ago, my my daughter, Ilimomakalai, was taking her first steps. You know, she -- it's her first time walking. So if you can imagine, she is, you know, dawdling around, looking down at her feet. She looks up at us, and she has the biggest smile on her face. Right? Just pure stoke. It's -- it's a new experience, and she's loving it. [...] And let me share you -- share with you one more story. So this was about a year ago, actually just before my baby was born,</p>	Please see General Response.

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		<p>actually just a few days before. We were -- you know, my -- my wife was having contractions. Right? And then, we're an older couple. We need to get to the hospital on time. So we grabbed the go bag, got in the car, headed out. And as we were trying to exit our neighborhood, we couldn't, because there were too many cars parked along the side of the street. And apparently, there were people walking to an exercise there in the Lightning Academy. Right? And it was so packed that the bus trying to go up the street couldn't make it through. We were bottlenecked in and stuck there. And so I left her in the car, in the AC. I ran out to get a solution, to try to get us through. There was lot of people in uniform. So the first person in uniform, I asked, "Hey, can you help us get through? We can't get through. My wife's -- may be in labor. We're trying to get to the hospital." He said, "No. Sorry. I need to get to this ceremony. I -- I need to get there. I'm late already. Sorry." Then I asked the next person in uniform. I said, "Can you help us? Can you help us here?" He said, "No. Sorry. We have a right to be here. We have a right to park here because we're having a ceremony, a graduation ceremony over there." The third uniformed person I asked, he said, "Why are you raising your voice at me? Why are you raising your voice at me? This isn't my fault. This is someone else's fault. You need to talk to someone else." He went along and joined the rest of his friends at the ceremony. So it wasn't until all of my neighbors got out of their cars, walked out of their homes to back me up -- because they could tell I was in distress that we were finally able to get an officer to come down and command everyone to move their cars. Right? So this is a situation where the livelihood -- the actual health and safety of my wife and my unborn child were put at risk because of an exercise of ego, in my opinion, that was happening in our neighborhood. So I just think that the military has not been good neighbors to the people in this -- in this community. And therefore, I -- I can't trust that they would be good stewards of these lands, here or elsewhere across the pae 'aina. So I argue for the de-occupation of all these lands across Hawaii. Mahalo.</p>	

Commenter	Submitted By	Comment	Response
Kaulana Ing		And then imagine that that face turns into pure terror, because our entire house is shaking because a helicopter is flying directly over our home at 8:00 p.m. And that's another first experience for her, the first experience of terror. This is a reality of living here in Wahiawa. That day, she learned that she has people around her, protecting her, who will share joy with her; and also that, at any given moment, she is subject to terror, that the soundtrack of her childhood will be machine guns at 10:30 p.m., waking her up at night, will be mortar rounds echoing through our valley, with people zooming up to get to their exercises on time, just barely missing us as we walk around our street.	To alert the U.S. Army Garrison Hawaii of a specific noise complaint, please call the Community Concern Line at (808) 787-1528 or send an email to usag.hawaii.comrel@army.mil.
Cherilyn Inouye		The Army and the US military continues to occupy stolen lands, lands that belong to Native Hawaiians. I oppose the US military continuing to occupy land on O’ahu (or any island) that does not belong to them, and should instead benefit the Hawaiian people. The US continues to illegally occupy an independent sovereign nation. We do not benefit as a community from the US military's presence and their activities poison our land, sea, and air. This EIS is just the military putting on a show. Do not approve the leases for Kahuku, Kawaihoa-Poamoho and Makua!	Please see General Response.
Mikey Inouye		Aloha. Nice to see you again -- on box check night number 2. Quick question. Where the food at? You know, both of -- all three of these are starting at 6:00. You know it's going to go late. Like, the basic, most common courtesy that I hope can fit within the vast U.S. military budget is to provide mea'ai for the people who are coming here, right, especially if we're going to be here till, like, 10:00. So, like, Colonel McGunegle, how's your note taking going? Can you add something for me? You got one Costco card? Like on the way tomorrow, if you can stop Waipio Costco, a couple blocks away from where my grandma lives, you know, yeah, pick up some chicken -- it's like \$5 still, right -- and some pizza? Super cheap, basic stuff, yeah. Because if you're going to try to manufacture, the least you can do is try to bribe us with treats, yeah. Okay. So like I said last night, we all know this whole environmental impact statement process is total and utter bullshit. But for us, it's a chance	Please see General Response.



Commenter	Submitted By	Comment	Response
		<p>to learn from each other, to see each other, and get our voices into the historical record. For you, it's a show you got to put on before you do whatever the genocidal U.S. colonial project requires of you. The huge military installation in Kahuku, whatever it is y'all do there, serves a similar colonial greenwashing function to the dangerously close windmills sitting right next to this elementary school and across the street from an indigenous bird sanctuary that this community of Kahuku fought to protect just a few years ago. They're both one of the many tentacles of the same capitalist he'e that serves and protects your genocidal U.S. empire. But that empire is falling, and its grip on all its colonial holdings is slipping. You see it everywhere, especially in Hawaii. We saw it in your decision to shut down Red Hill, because we all know the real reason why you chose to shut it down. And it wasn't to keep us or your service members safe. It's because community organized and built enough power to scare the shit out of you. We made you fear for these precious military leases. And you hoped you could put us back to sleep by conceding Red Hill. But tell me, does it look like we're sleeping? Nah. So, good night. We'll see you on the other side of empire, but until then, we'll see you tomorrow. Kū kia'ī Kahuku. Aloha 'āina.</p>	
Mikey Inouye		<p>Okay. Hello again. I'm Mikey from Makiki. Colonel McGunegle, could you tell everybody what I asked you to bring yesterday? No. I'm asking you. You have the mic. [THE MODERATOR: Comments only, Mikey.] Okay. Okay. Why does he even have a mic, then? Okay. So last night I asked you why you didn't do the basic common courtesy of bringing mea 'ai, when it's, you know, six to -- now past ten. Right? Every very single one of these three days. And I asked you, just, on the way over because it is on the way over -- just bring -- bring some pizza from Costco. And, you know, it's a small thing, compared to all the other stuff that we're here for, but it's an indicator of how you approach the big things. Yeah? You can't even come through on a Costco pizza. How are we supposed to trust you about these military leases and doing the right thing about it? It's basic kind stuff, yeah, that you just don't seem capable</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>of, because it's not part of your mission. Right? You don't actually care about the well-being of any other people here. You just care about being mission-ready and keeping, you know, your grip on all of these colonial holdings that are getting looser and looser by the day. Right? And the decision that you all are going to make, we all know, as we've all said over these past three days, is largely predetermined. You know, best case scenario, you're going to sprinkle some breadcrumbs on the table and tell everybody that you baked us a big birthday cake, you know? And we -- we -- we see through all of those lies now. And you know that we see through all of these lies. And we've also seen America's true face, because the mask has fallen, you know? It -- it slipped a whole lot with Red Hill in 2021. And the Red Hill leaks again in 2022. And it broke and fell to the floor with the genocide that is still going on in Palestine. We know what the actual project of the US military is. It is one of genocide, and capital accumulation, and holding on to power and land and that which feeds us, that you do not deserve to have. And going back to food -- right? -- you, not feeding people, it's -- it -- it really speaks to the entire history of the US military. You have paved over and bombed the 'aina, the land, that which feeds us. Yeah? And the only people who fed each other here was us. We fed each other. We kept each other safe. We take care of each other. We don't need you to do that, because clearly you're not even capable of doing that bare-minimum thing. Yeah? And you may be powerful. You may think you are powerful. God knows you are powerful. You could bomb us right now, and -- and say that, you know, someone was hiding an RPG next to my tripod or whatever. Right? But, you know, you are a paper tiger. And I think more and more people are starting to realize that, and that there are already holes poked through that paper tiger. And when enough of us wake up and realize that, like we woke up and realized that at Mauna Kea and Kahuku and Makua, we're going to stand up. And you're going to see, we're all going to see, the world is going to see how easy it is to bring this giant to its fucking knees. Because you know what? There's basically just one road in and out</p>	

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		<p>of Kahuku. And because of climate change, it's getting narrower every day. There's -- there's a major one-way street through Waikiki, the main flow of capital that y'all care so much about. Right? Going into Pu'uuloa, Pearl Harbor, basically one wide-ass road. Going to Makua and to the -- the -- the bullshit, you know, golf ball satellites, you know? Yeah, yeah, yeah. There's -- there is so little you can do when people rise up and cut off the already clogged and congested arteries of capital. And you're going to see just how much you have misjudged and underestimated the people. You're going to see how easy it is to -- to -- to -- you're going to see how much you need to start making some major concessions. Because we are going to cut off the arteries of capital in the same way that this hair tie is cutting off circulation to my finger. It's going to be so easy. And we're going to see you on the streets. And we're going to see you on the other side of empire. But until then, we'll keep it tight for the US empire, and hang loose for the people. Aloha.</p>	
Mikey Inouye		<p>Aloha. I'm going to try to keep this brief because I'm from Waikiki and I want Waianae folks to have, you know, their time. But it's awesome to see all these great Kanaka and other land-water protectors here. But we -- we kind of all know that this process isn't for the people. It's not for us. It's a box check for you guys. . . . You just, you know, you -- you add notes to your grocery lists. You - - you nod in an imitation of empathy and you -- you say your canned statements that you learned in your PR training courses. And you say, like, we see you, we hear you, we feel your pain, and we're going to do whatever the hell want anyway. . . . I mean, like, we learned this from Red Hill. You know all the meetings, all the public comments. These are -- this not the Draft EIS, this is the public comments for just the scoping hearing, and we have until August 7th to submit comments for the Draft EIS, but all of this is just a waste. Yeah? Like, you're going to do what you're going to do. . . . And so, you know, it's -- it's -- it's kind of good that we're all here, but we know that this is theater. We know that this is a farce because you have another goal, right? You know the U.S.</p>	Please see General Response.

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		<p>Military says you're -- you're here to protect us. But it's, like, protect us from what? Protect us from whom? What have -- have - - well, any other country do to Hawaii that the U.S. Military hasn't already done? What's China going to do? Contaminate our soul source aquifer? What's Russia going to do? Steal Makua and then bomb it and contaminate it with white phosphorus and lead and depleted uranium? . . . . Like, there is nothing that any other country could do or even wants to do to Hawaii that you haven't already done. And you're going to continue to do it and this process, we all know it's bullshit. . . . We know where this is going to get settled. It's going to get settled on the streets, so we'll see you in the streets. We'll see you in front of the gates of all the lands that you've stolen. . . . End the leases today. End the leases yesterday, not 2029. ho'iho'i makua, aloha 'āina.</p>	
Bianca Isaki		<p>Good afternoon - I am requesting further documents in addition to my earlier request. Please provide a copy of: 1) USACE-POH, 2017: U.S. Army Corps of Engineers-Honolulu District. (2017). Analysis of Alternatives Study: Pōhakuloa Training Area State-Owned Lands. 2) U.S. Army Hawaii (USARHAW). (2017). Makua Military Range Analysis of Alternatives: No Action Alternative, as discussed on page 1-9 of the Army DEIS for O`ahu land retention s. 3) Any "Analysis of Alternatives" for Poamoho lands on O`ahu and Kahuku Training Area on O`ahu as discussed on page 1-9 of the Army DEIS for O`ahu land retention s. I am willing to pay applicable, reasonable fees, however we also qualify for a fee waiver because we will disseminate this information to the public through our social media and websites to educate them on the justifications for use of O`ahu land. My contact information is: _____. Thank you; Bianca</p>	<p>Training Standard Operating Procedures (SOPs) are internal documents that are not available for public disclosure. Appendix F includes relevant information from the SOPs. The Freedom of Information Act (FOIA) Library and FOIA Request processes 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>
Bianca Isaki	KAHEA: THE HAWAIIAN ENVIROMENTAL ALLIANCE	<p>1. "Land retention" for Army training spans, at minimum, state and federal lands. "There are seven Army-managed training areas on O`ahu used by the U.S. Army Hawaii (USARHAW) to meet mission requirements." ES-1. These comprise approximately 51,000 acres of O`ahu lands or over 13% of the O`ahu total land area, but Army use of only 6,322 acres are assessed under the DEIS. a. Army uses of</p>	<p>The Proposed Action in this EIS is retention of State-owned lands. Cumulative impacts from training for the training areas that contain State-owned lands are discussed in the cumulative impacts analyses at the end of each resource area section in Chapter 3. Otherwise assessing Army</p>

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		<p>state and federal lands must be assessed as a single action. Army uses of state lands are increments of its larger total mission, are necessary precedent to that mission, and commit to uses on federally-controlled lands. HAR §11-200.1-10.</p> <p>Over the past six decades, these State-owned lands have been an important portion of the approximately 18,000 acres of Army training areas on KTA, Poamoho, and MMR, and of the approximately 51,000 acres of Army training areas across O’ahu. The State-owned lands are critical to the Army mission because they provide access to and among the U.S. Government-controlled portions of O’ahu training areas, act as buffers between public lands and training activities, and support numerous training facilities and capabilities that are essential to USARHAW, other military services, and local agencies. The State-owned lands contain some key training facilities not available elsewhere on O’ahu. DEIS at 1-1 (emphases added). The DEIS admits the entirety of the areas taken under Army control, if not larger areas, are part of their operations. large quantities of land, away from populated areas and with adequate buffers for both soldier and public safety, to provide the training necessary to maintain soldier readiness for rapid deployment. Land retention would also allow the Army to continue ongoing and potential future training activities conducted on or over the State-owned lands that are required to support the military mission, including UAS, helicopter, and other aircraft operations, and company-sized maneuver and reconnaissance training. State-owned lands on O’ahu also provide access to and among U.S. Government-controlled lands, such as access to the western part of KTA, and include areas with sufficient slopes for safe maneuver area that is critical to Army training. DEIS at 1-14. Army infrastructure - “KTA X-Strip landing zone (LZ) and the MMR Combined Company Arms Assault Course (CCAAC) facilities cannot be relocated to U.S. Government-controlled lands”. DEIS at 3-2.[1 The DEIS presents conflicting information. It discounts the “no action” alternative because “access to all ground training areas on Poamoho (approximately 4,370 acres)</p>	<p>use of all land on O’ahu is not within the scope of this EIS.</p> <p>The Army requires sufficient land area to train units that are company-sized or larger. While smaller units could train and there could be in instances fewer impacts, this approach would not meet the military mission to cohesively train sufficiently sized units.</p>

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		<p>would be lost,” (DEIS at 2-43, 2-44) but also states “no ground-training is conducted” at Poamoho and “ground training on Poamoho has not occurred within the last decade.” DEIS at 2-15.] The Army’s actions on all lands on O’ahu are required to be assessed together in its EIS under Hawai’i Revised Statutes (HRS) Chapter 343, also known as the Hawai’i Environmental Policy Act (HEPA). <u>Though the Army attempts to narrowly define its action as “secur[ing] the long-term military use of State-owned lands on O’ahu”, the State lands cannot be examined in isolation.</u> “The State-owned lands provide essential connections for maneuvering throughout the O’ahu Training areas.” DEIS at ES-5. “Critical U.S. Government-owned facilities and infrastructure are located on the State-owned lands.” Id. The Army concedes, “[r]etention of maneuver area on State-owned lands at the O’ahu training areas is important for maneuver and non-live-fire training, and to accommodate company-sized and larger units.” Id. Because the state lands are integral to the Army’s larger operations, that larger program must be disclosed and their impacts assessed. For instance, if state lands were not retained, the Army would apparently have to use smaller-than “company-sized” units. DEIS at ES-5. Would these less-large units have fewer environmental and economic impacts?</p>	
Bianca Isaki	KAHEA: THE HAWAIIAN ENVIRONMENTAL ALLIANCE	<p>State and federal land Army uses must be cumulatively assessed. The Army improperly limits disclosure and assessment of cumulative environmental impacts - geographically limiting the action to “State-owned” lands and postulating an artificial baseline of land uses. These improper limitations prevent the DEIS from disclosing and assessing the cumulative 1 The DEIS presents conflicting information. It discounts the “no action” alternative because “access to all ground training areas on Poamoho (approximately 4,370 acres) would be lost,” (DEIS at 2-43, 2-44) but also states “no ground-training is conducted” at Poamoho and “ground training on Poamoho has not occurred within the last decade.” DEIS at 2-15. impacts of even the limited “real estate” action the Army defined. HAR §11-200.1-2 (defining “cumulative</p>	<p>The Proposed Action is retention of State-owned lands and there is no need to address impacts unrelated to the Proposed Action and cumulative impacts not relevant when combined with the Proposed Action. The baseline for analysis considers all prior and current ongoing activities, environmental monitoring, and conservation activities. Each resource area section discusses the combined impact of past, present, and reasonably foreseeable future actions.</p> <p>Section 2.5 of the Final EIS has been revised to state the No Action Alternative is identified as the</p>

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		<p>impacts”). These impacts include ecological effects (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic effects, historic effects, cultural effects, economic effects, social effects, or health effects, whether primary, secondary, or cumulative, whether immediate or delayed.” Id. <u>First, the DEIS assesses cumulative impacts of, amongst other things, a proposed resort expansion, pedestrian walkway, and first-responder campus, but nowhere addresses its adjacent, integrated uses of federally-controlled lands for Army training.</u> DEIS at 3-9 through 3-11. The Army includes a proposed Pūpūkea strip mall in its cumulative impacts analysis, but not integrated uses of federal lands for Army training? The Army’s analysis is evasive. Second, the Army’s assessments of significance are impaired because they ignore federal land uses. As discussed infra, DEIS concludes “no significant impacts” on “historic and cultural resources; hazardous substances and hazardous wastes; air quality and greenhouse gases; noise; geology, topography, and soils” and “less than significant impacts” on “water resources; socioeconomics; transportation and traffic; and human health and safety.” DEIS at ES-11. Would this still be the case if the Army’s federal land use were assessed as required by HAR §11-200.1-13(b)?</p>	<p>preferred alternative for Poamoho (i.e., the State-owned land at Poamoho would not be retained).</p>
Bianca Isaki	KAHEA: THE HAWAIIAN ENVIROMENTAL ALLIANCE	<p>Third, DEIS disclosures of hazardous substance risks solely on state lands are meaningless because the nature of pollution is that it does not stay in one place. The Army may not have above or underground storage tanks for hazardous materials on any state lands, but if they are on adjacent federal lands, the contamination risk is nearly the same. DEIS at 3-141. “State-owned land at KTA is not permitted to be used as impact areas for explosives or incendiary military munitions of any kind” but <u>if on federal lands, the munition detritus could anyway pollute state land and surrounding community.</u> DEIS at 3-144.</p>	<p>The Proposed Action addressed in this administrative EIS is a real estate transaction (land retention). Military training is discussed only in the context of ongoing activities and their impacts because of land retention, and no changes in training are proposed. Ongoing training has been addressed through previous NEPA and other planning documents, which included measures to address impacts from training activities. To avoid or minimize adverse impacts, the Army would continue to manage hazardous substances and hazardous wastes through the regulatory</p>

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Bianca Isaki	KAHEA: THE HAWAIIAN ENVIRONMENTAL ALLIANCE	<p>2. Army fails to disclose extent to which lands will not be cleaned up under the leases. a. DEIS is “segmented” because it omits clean up as a lease condition. <u>Hawai’i environmental review rules prohibit “segmentation” or piecemealing of proposed actions into smaller components because this artificially minimizes the significance of environmental impacts.</u> The Army specifically denies it is in violation of this “no segmentation” rule because it treats land retention, continuation of ongoing activities within any State-owned land, and lease compliance actions and cleanup and restoration of former training areas “as a single action and analyzed together in this EIS.” DEIS at 2-3. This is inconsistent with their own DEIS. First, the Army states it does not assess “lease compliance” actions (i.e., clean up) because it “cannot begin until this EIS is complete”. DEIS at 2-2. If the Army can’t clean up the lands, how does its DEIS disclose impacts of continued use will be? Put otherwise, the DEIS cannot meaningfully disclose the significance of impacts of its proposed land retention without assessing whether it can clean up after its ongoing land uses. The Army assumes, without basis, future lease terms would be the same and does not assess or propose new lease terms. DEIS at ES-12 (“parameters for the lease compliance actions would be defined and determined after completion of this EIS. Lease compliance actions for a new lease are unknown but are assumed to be the same as the current lease”); at 2-2 (“it is assumed that the Army would be held to new lease conditions that are the same as or similar to the existing lease conditions”). Even while assuming the leases won’t change, the Army asserts it cannot assess “parameters for lease compliance actions” because the existing leases haven’t ended yet. DEIS at 2-2 (“parameters for lease compliance actions in the current leases are subject to the terms of the 1964 leases and negotiation with the State, which cannot begin until this EIS is complete, and an alternative has been selected for implementation; therefore, the parameters for these lease compliance actions within the State-owned land not retained would</p>	<p>requirements discussed in Appendix J of the EIS and USAG-HI SOPs.</p> <p>Sections 2.1 and 3.5 were revised to state that the Army would follow applicable regulations to conduct cleanup and restoration activities for any potential MEC on closed ranges (i.e. State-owned land not retained) at the end of the current lease.</p> <p>Section 4.2.4 discusses the reasons why specific cleanup and restoration activities, including timelines, after lease expiration are not able to be determined at this time.</p>



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		<p>be defined and determined after completion of this EIS.”). Lease compliance through clean-up is interconnected with continued land retention. The DEIS must include this assessment. b. Compliance with lease terms may not clean up contamination. The 1964 leases terms on clean-up requirements are vague and slippery. The Army “agrees to reforest areas” but only “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” and only in KTA and Poamoho areas. DEIS V. 3.2 Appx. G PDF 720 (KTA lease ¶128), at PDF 744 (Poamoho lease ¶128); at PDF 712 (not applicable to MMR). Is a wildfire, reduced streamflow caused by Army actions, or slow poisoning by Army wastes considered a “direct result” of Army activities? The Army 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 expenditures for removal of shells will not exceed the fair market value of the land.” DEIS V. 3.2 Appx. G, (KTA lease ¶129), (Poamoho lease ¶129), (MMR ¶18, 26). The DEIS fails to disclose existing technical and economic capability that may limit removal of weapons and shells. The DEIS nowhere discloses the fair market value of the land. Without this information, Army references to “cleaning up” after the leases expire are meaningless. The Army may do nothing if it is too expensive or the contamination too complex. Instead, if the Army is to retain any land, and they insist on using economic viability as a parameter for clean-up efforts, they should commit to not causing harm that exceeds the fair market value of the land. Or they could remove the conditional language by simply saying, “We will remove weapons and shells used in connection with our training activities.” The Army should not be allowed to contaminate land without cleaning it up, simply because it is too expensive. Clearing weapons and shells would not anyway address other kinds of contamination, including those evident in the Mākua nearshore ecosystem as discussed infra Part 9. Currently, should anyone or any property be harmed by the Army’s use of these lands, neither the state, nor the</p>	

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Bianca Isaki	KAHEA: THE HAWAIIAN ENVIRONMENTAL ALLIANCE	<p>federal government is responsible under the leases. DEIS V.3.2 at PDF 718, 724 (KTA lease ¶¶8, 23), PDF 737 (Poamoho lease ¶¶8, 23); PDF 753 (MMR lease ¶¶7, 21). This cannot continue.</p> <p>3. Army evades disclosing changes to state land use; Program-level EIS required. The Army is proposing to continue to use state public trust lands for an indeterminate future period for military training but fails to disclose changes to their use of those lands: As a real estate action, the Proposed Action would enable continuation of ongoing activities on the State-owned lands retained by the Army. It does not include construction, modernization, or changes to ongoing activities within the State-owned lands retained. Additionally, the Proposed Action does not include changes to the use, size, or configuration of the special use airspace overlying the State-owned lands. DEIS at ES-6 (bold emphasis added); 2-1 (“Proposed Action does not include construction or changes in military training activities or changes to resource management actions.”). The Army does not disclaim any future plans for changes, construction, modernization, or new resource management, only that the DEIS does not assess these. Commenters raised the Army’s failure to disclose a Real Property Master Plan for the Pohakuloa Training Area prepared by HHF Planners in 2020, which describes long term land use plans for Pōhakuloa, and find it “is unclear if a similar study has been completed for O’ahu Army sites.” DEIS V. 3.1 at O-133. To the extent they have any plan, budget, or other information about construction, resource management, modernization, activities or use of airspace, the Army should be preparing a program-level EIS that addresses more than a narrow “real estate” action. A “program”: means a series of one or more projects to be carried out concurrently or in phases within a general timeline, that may include multiple sites or geographic areas, and is undertaken for a broad goal or purpose. A program may include: a number of separate projects in a given geographic area which, if considered singly, may have minor impacts, but if considered together, may have significant impacts; separate projects having generic or common impacts; an entire plan having wide application</p>	<p>A Real Property Master Plan for the O’ahu training areas containing State-owned lands is not warranted. A Range Complex Master Plan is maintained for O'ahu training areas (USARHAW, 2022). It did not identify any proposed projects or changes in training activities related to the State-owned lands. Section 3.2 of the EIS discloses the required land use designation processes with the State should a lease be the method for continued land retention. As noted in the EIS, changes to Army training or new construction are not part of the Proposed Action for this EIS, and would require separate NEPA analyses.</p>

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		<p>or restricting the range of future alternative policies or actions, including new significant changes to existing land use plans, development plans, zoning regulations, or agency comprehensive resource management plans; implementation of multiple projects over a long time frame; or implementation of a single project over a large geographic area. HAR §11-200.1-2. By failing to assess elements of its program - including changes to land uses - the Army improperly attempts to evade full disclosure of significant impacts. DEIS disclosures are “meaningless without the conscientious application of the environmental review process as a whole[.]” HAR §11-200.1-1(b). The DEIS is unlawfully reduced in scope, consequently the only mitigation for “land use” proposed is “consider[ing] adding non-barbed wire fencing and signage to minimize accidental or intentional trespass from adjacent non-U.S. Government-controlled land (applies to Alternative 2 for KTA, and Alternatives 2 and 3 for MMR).” DEIS at ES-11.</p>	
Bianca Isaki	KAHEA: THE HAWAIIAN ENVIROMENTAL ALLIANCE	<p>4. Compliance with other laws does not excuse disclosure and assessment under HEPA. The DEIS fails to disclose and assess impacts under the incorrect presumption that compliance with other laws excuses such disclosure and assessment under HEPA. “If the fact that other laws and rules that facially appear to bear upon the environmental effects of an activity would exclude the activity from HEPA’s purview, then this would frustrate HEPA’s purpose of requiring agencies to appropriately consider environmental concerns in their decision-making process.” <i>Umberger v. DLNR</i>, 140 Hawai‘i 500, 518, 403 P.3d 277, 295 (2017) quoted by <i>Kia‘i Wai o Wai‘ale‘ale v. Dep’t of Water</i>, 151 Hawai‘i 442, 460, 517 P.3d 725, 743 (2022). The Army cannot merely cite CERCLA as an escape hatch to HRS Chapter 343 disclosure and assessment requirements of the irrevocable commitment of resources, including by contaminating land, as discussed supra Part 2. DEIS at 2-3. Irrevocable commitment of natural resources, or curtailment of the range of beneficial uses of state lands or nearby areas due to persisting contamination constitutes a significant impact that must be disclosed. HAR §11-200.1-2.</p>	<p>Section 2.1 has been revised to indicate that the Army would coordinate with the State of Hawai‘i throughout the CERCLA process.</p>

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Bianca Isaki	KAHEA: THE HAWAIIAN ENVIROMENTAL ALLIANCE	Similarly, the Army inadequately responds to “concerns regarding contamination of soils from MC [munitions constituents], impacts on soils and topography from natural disasters, and impacts on beaches” by referencing preparation of an Integrated Natural Resources Management Plan (INRMP) in compliance with the Sikes Act Improvement Act, as amended through 2003 (Public Law 108-136). DEIS V. 3.2 at E-32. The DEIS does not disclose whether and how INRMP preparation addresses contamination to a less than significant level.	Additional management and mitigation measures and plans the Army adheres to on State-owned land minimize environmental impacts, in addition to the INRMP, are discussed further in the narrative for each training area in the response to the referenced comments on geology, topography, and soils in Appendix E; these are also incorporated into the alternatives analysis in the EIS. Impacts from MC are discussed in Section 3.6 of the EIS.
Bianca Isaki	KAHEA: THE HAWAIIAN ENVIROMENTAL ALLIANCE	5. DEIS violates HEPA by referring to stale documents unavailable to the public, and thereby evading public review procedures. The DEIS includes no links to the 2010 INRMP or other plans, studies, and documents upon which DEIS conclusions rely. DEIS at 5-20). The DEIS asserts a “2018 Section 106 [Programmatic Agreement] for O’ahu resolves adverse effects on historic properties that may result from ongoing routine training and related activities at KTA and Poamoho, including activities that take place on State-owned lands,” without providing the information and analysis therein. DEIS at 1-16. The DEIS relies on an Analysis of Alternatives Study (AAS) prepared in 2017, which apparently reduced the scope of alternatives considered. DEIS at 1-9. These documents are not in the DEIS and not available to the public. We requested, both informally and through a FOIA request, the Army’s Analysis of Alternatives for Poamoho, Mākua, Kahuku, and Pōhakuloa training areas on May 7, May 15, and June 16, 2024 and have not received any documents as of this writing. As a “primarily procedural and informational statute” courts reviewing a HEPA challenge are required to determine as a question of law whether an agency “has followed the correct procedures and considered the appropriate factors. . . .” <i>Sierra Club v. Dep’t of Transp.</i> , 115 Hawai’i 299, 342, 167 P.3d 292, 335 (2007); see <i>Kepo’o v. Watson</i> , 87 Hawai’i 91, 100, 952 P.2d 379, 388 (1998) (procedure is at the heart of environmental review). Public review and comment is integral to HEPA procedures. Without access to information and analyses that	The 2018 Section 106 Programmatic Agreement for O’ahu has been added to the O’ahu ATLR EIS website ( <a href="https://home.army.mil/hawaii/OahuEIS">https://home.army.mil/hawaii/OahuEIS</a> ) under the “Documents” tab.  The O’ahu Analysis of Alternatives Study is not currently publicly available due to operational security requirements. The 2010 Integrated Natural Resources Management Plan and other non-publicly available documents can be obtained through the Freedom of Information Act (FOIA) process. The FOIA Library and FOIA Request processes 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> .

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		<p>led to DEIS assessments, members of the public cannot meaningfully participate. HRS §343-1 (“the process of reviewing environmental effects is desirable because environmental consciousness is enhanced, cooperation and coordination are encouraged, and public participation during the review process benefits all parties involved and society as a whole.”) quoted by Sierra Club, 115 Hawai’i at 327, 167 P.3d at 307 (emphasis in original quotation). The DEIS is required to be “essentially self contained, capable of being understood by the reader without the need for undue cross reference”. HAR §11-200.1-1(c)(2). Though it can cite to underlying studies, the DEIS is required to include the actual analysis “of the probable impact of the proposed action on the environment” and cannot assert that analysis was already completed in 2010 or 2017 when the “real property” action -was not proposed until 2021. HAR §11-200.1-24(l).</p>	
Bianca Isaki	KAHEA: THE HAWAIIAN ENVIROMENTAL ALLIANCE	<p>6. Assessment of cultural practice impact is disingenuous. a. Vague, unenforceable mitigation for cultural impacts results from misleading assessment of cultural impacts. “All the State-owned lands associated with the Proposed Action have been identified as ceded lands.” DEIS V 3.2 at E-19. The Army’s recommends mitigating cultural impacts by: 1) working with cultural practitioners to update and/or develop a mutually beneficial cultural access plan that facilitates safe engagement with cultural resources, practices, and beliefs within each project area, 2) promoting better long-term stewardship of the ‘āina with regard to military use of the land, and 3) reviewing and updating the Army’s public education campaign to ensure the various access programs are known and understood by the community. DEIS V.2, Appx. B (CIA at 161). These are the same measures proposed to mitigate environmental justice impacts. DEIS at ES-11. None of these measures addresses the generations-long loss of land, impacts to nearby cultural resources, including native species, and connection to stories places now under Army control. None of these measures address significant impacts admitted by the DEIS: Continued retention or alienation of ceded lands from the public trust intended for the benefit of Native Hawaiians would be a</p>	<p>The Army does not have any additional mitigation measures to address significant impacts related to cultural access to sites on State-owned lands, other than those already proposed in the Draft EIS. Also see EIS Sections 3.4.5 and 3.5.5 for a discussion of existing management measures and proposed mitigation measures.</p>

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		<p>loss to some extent of this sense of connection. Non-Native Hawaiian control of the ‘āina impedes Native Hawaiians’ ability to perpetuate and practice this belief system, including their responsibility to engage, connect, and care for the ‘āina. Therefore, this continued loss of land represents a disproportionate effect and a long-term, significant, adverse impact on communities with environmental justice concerns. DEIS at 3-284. The Army’s wholly insufficient mitigations result in part from the Army’s disingenuous interview and assessment methods, which discounted community members’ concerns. DEIS at 3-125 “while survey respondents and interviewees identified resources, practices, and beliefs, informants did not directly connect these resources to the specific geographical boundaries of the State-owned land at KTA”; at 3-128 (“While survey respondents and interviewees identified resources, practices, and beliefs, informants did not directly connect these resources to the specific geographical boundaries of Poamoho.”). In KTA, Neil Hannahs pointed out “valuable water resources” in KTA “including streams and a bog . . . “however, he did not provide a specific location for these resources” and “he did not indicate whether these [watershed cultural practice] protections were occurring within the State-owned land at KTA.” CIA at 55. T. Lenchanko said his “‘ohana from Kahuku shared with him that they sighted over 100 different native plants within the KTA area”; however, he did not provide a specific location for these resources.” Id. at 57. Interviewee Oliveria discussed “large burial sites with iwi kupuna . . . within the KTA and two recently discovered burial caves; however, he did not provide any specific locations for these resources. Id. Lenchanko recounted “[k]upuna would take younger generations to areas like Poamoho to teach them about the resources and pass on knowledge to the next generation.” CIA at 82. Yet, the CIA asserts it “is unclear how many of these cultural practices and beliefs are occurring within State-owned land versus the broad geographical area around the project area” at Poamoho. CIA at 77. In Mākua, William Aila identified “one important resource is a spring, which has been covered up by military infrastructure but</p>	

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		<p>then found again after a fire”, “are orange trees from the original kuleana lands and many more critically endangered native plants in the area, as well as a snail enclosure”, pueo, and they would “collect thatching material and wood to construct the church.” CIA at 119. The CIA again concluded, “[h]e did not provide a specific location for this collection area.” Id. Eric Enos shared “there are many cultural sites as well as native species” within Mākua Valley; “however, he did not provide specific locations for these Resources.” CIA at 120. “Kalo farming and other cultural practices rely on ‘the watersheds that start in the mountains in the back of the valley and feed into the larger system.’ However, Mr. Enos did not provide specific locations for these practices.” CIA at 121. Keola “Grace discussed how surfing, farming, and ranching are cultural practices connected to Mākua. However, he did not provide specific locations for these practices.” CIA at 122. Despite the premium the Army puts on locating cultural practices solely on state-lands, their consultants did not provide any maps. “While maps were not provided during the interviews, the interviewers have found that 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.” CIA at 6. The point is the CIA preparers discounted evidence of cultural practice that may occur on non-state lands without apparently asking interviewees to specify or providing maps to ascertain this information. The CIA obtained its milquetoast mitigation recommendations under a flawed method and should be discounted as well. If specific locations within state-lands needed to be provided in order for cultural practices to be considered relevant to the DEIS, the Army should have made such a standard known. If the Army was genuine in learning about cultural practices that may be impacted by their actions, it could have simply asked community members whether or not any of the practices mentioned occur within the state-lands in question. It is disingenuous that they did</p>	

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		<p>not ask such an obvious follow-up question. It is poor logic to assume that because people did not, unprompted, volunteer specific locations of their cultural practices, that they do not occur on the relevant state lands. b. No mitigation for cultural impacts even when state lands implicated. To the extent it sought to accommodate a “Native Hawaiian concept of the cultural landscape”, the CIA lacks recommendation measures addressed to them. Interviewee “Caceres recounted burials and the entire landscape is a cultural resource” at KTA.” CIA at 54. The CIA is silent on Kyle Kajihiro’s recommendation that “the Papakū Makawalu methodology, developed by the Edith Kanaka’ole Foundation, be utilized in addition to a separate, in-depth cultural landscape study and ethnographic survey.” CIA at 57. These concerns are not addressed. Even where interviewees specified impacts on state lands, no specific mitigation is proposed. Interviewee “Oliveira mentioned the inability to engage in the cultural practices of caring for iwi kūpuna and mālama ‘āina within the State-owned land. He also specifically mentioned how retention of the State-owned land impacts the ability to engage in the system of ka’ānani’au, a system connected to temples and land divisions.” DEIS at 3-132. The DEIS excused away, with no evidence or analysis, even those cultural practices and impacts on State lands. Stating, for instance, “physical impacts on cultural resources (i.e., archaeological sites) were more likely to occur from ongoing public (off-roading) activity than from military training at KTA.” DEIS at 3-126. Yet commenters specifically raised impacts from “[m]ilitary personnel engaged in illegal bonfires, illegal off-roading in conservation areas, and illegal parties with alcohol consumption on public beaches[.]” DEIS V.2 at O-107 (Hawai’i Peace &amp; Justice). These significant impacts are not recognized, much less mitigated, through CIA recommendations to educate the public about Army access policies. c. Further survey of historic sites is needed to assess and mitigate potential impacts. The DEIS concedes more than a third of the MMR state lands - 288 acres “are unsurveyed or were subjected to reconnaissance studies that do not provide as thorough an understanding of extant historic</p>	



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		<p>and cultural resources due to the low intensity of the survey coverage.” DEIS at 3-107. Many historic sites, and thus impacts of continued training activities in that area, are unknown. The more than Mākua lands are studied, the more physical historic information is disclosed. The Army’s chart of archaeological surveys shows almost every new survey identifies new sites. Id. at 3-108. By restricting review only to historic sites on state lands, the DEIS fails to assess and disclose the significant relationships between the sites. It is those connections that show how the sites contribute a history of a people, a community, not just as discrete “sites.” DEIS at 3-110. 7. Public education on access policies does not remediate unreasonable impacts to access. The CIA recommends: “reviewing and updating the Army’s public education campaign to ensure the various access programs are known and understood by the community.” DEIS V.2, Appx. B (CIA at 161). The problem is not a lack of education. The Army’s access limitations are the problem. Many cannot walk miles from public roads to cultural sites located on rough terrain on the interior of tracts. At KTA, public vehicular traffic is not permitted beyond the locked gate on Pupukea Road; “however, the public can walk around the gate to access Kaunala Trail and the Pūpūkea Forest Reserve.” CIA at 131. A “vehicle permit is required if driving into Poamoho, with permits only being issued for Fridays, Saturdays, Sundays, Mondays, and State/federal holidays.” CIA at 132. Access at Mākua is ever more restricted. “[C]ultural access requests must meet certain requirements to be granted, such as community group coordination, escort availability, limited access times, and limitations on certain locations that are off limits due to security or safety concerns.” DEIS at 3-133. The Army’s 2018 Section 106 programmatic agreement access policy does not apply to Mākua. Id. Requiring permission slips is offensive to the many cultural practitioners who do not see their traditions governed by the state or military, nor want to publicize their cultural uses of these lands. It is often impractical to be required to wade through bureaucratic procedures to access undeveloped lands on timelines that do not factor in the permitting process.</p>	

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		<p>Other agencies, including the National Park Service, have represented they make efforts not to bother practitioners and therefore do not keep firm statistics on cultural accesses. The DEIS does not assess the primary issue - What will cultural practices and relationships to these places look like after 130 years of limited access?</p>	
Bianca Isaki	KAHEA: THE HAWAIIAN ENVIROMENTAL ALLIANCE	<p>8. DEIS fails to disclose secondary impacts of changing land use laws for military purposes. The DEIS is required to disclose potential significant impacts, including indirect and secondary impacts of a proposed action. HAR §11-200.1-24. The Army acknowledges its proposed use of State conservation district and City agricultural lands is nonconforming and will be unlawful as soon as the lease ends in 2029. DEIS at 1-19 (“Tract A-1 at KTA lies within the agricultural district, higher elevations of Poamoho lie within the conservation district protected subzone, and most of the State-owned land on MMR lies within the conservation district limited subzone . . . The remainder of the State-owned lands fall primarily within the resource subzone[.]”). The Army proposes to petition the State: (1) for rulemaking to create a new conservation district subzone “to allow military uses of the State-owned land retained by the Army”; and (2) a special permit to allow its non-agricultural uses. DEIS at 3-12. Merely disclosing rulemaking and permitting procedures does not disclose nor assess impacts of widespread rule changes. The DEIS concludes: “Significant impacts could be reduced to less than significant through the State’s approval of a petition for special subzone in the conservation district for Tract A-3 and a special permit in the agricultural district for Tract A-1.” DEIS at 3-21. Again, the DEIS makes the same flawed assumption that compliance with other laws (here HRS chapters 183 and 205) suffices as compliance with HEPA. Further, the Army’s proposal to amend conservation district rules, HAR chapter 13-5 is integral to the proposed action and therefore must be assessed as part of the entire action. The DEIS must disclose what significant impacts may result from creating a new class of conservation district lands - are there other military uses that could then encroach into the</p>	<p>Section 1.4.3 (Table 1-2) has been revised to clarify assumptions of a rule amendment for the conservation district. Secondary and cumulative impacts that could result are discussed in Section 3.2.6, but only in the context of the State-owned lands at KTA, Poamoho, and MMR.</p>

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		<p>conservation district? Shooting ranges? ROTC training schools? Would other lands fall under the new subzone? The DEIS must also assess how significant impacts could be reduced, such as specific conservation district use permit conditions or narrow tailoring of the new conservation subzone. The DEIS does neither because it does not disclose how it would change the rules. What is the proposed rule? The DEIS is incomplete without this assessment and disclosure</p>	
Bianca Isaki	KAHEA: THE HAWAIIAN ENVIROMENTAL ALLIANCE	<p>9. Army’s contamination of Mākua waters and lands has widespread impacts. “Two ephemeral streams cross State-owned land at MMR, Punapōhaku Stream and Kalena Stream, as do one perennial stream, Mākua Stream, and one intermittent stream, Kaluakauila Stream”. DEIS at 3-231. As William Aila informed the Army, “munitions from outside the State-owned land have the potential to move downstream during heavy rains and contaminate groundwater and soil within the ROI.” DEIS at 3-133. Water also connects federal mauka Mākua, through streams, through “[t]hree muliwai (estuarine wetlands located adjacent to the ocean) ponds and the Hau Thicket”, all potential US ACE jurisdictional wetlands, to the ocean. DEIS at 3-231. MMR is composed of 3,408 acres of federal lands and 782 acres, or 19 percent, are State-owned land. DEIS at 1-8. The “most likely pathways for contaminant migration are surface water runoff during significant rainfall events and groundwater flow from the inland areas of MMR to the Pacific Ocean.” DEIS V.3.2 at E-28. This is also the case for KTA and Poamoho. DEIS V 3.1 at PDF39/ HI13 (Office of State Planning: “Given that all three ATR study areas may have toxic material associated with military training and readiness activities, the presence of these materials may have a deleterious effect on the natural water resources in all three areas. The perennial streams in and around KTA and Poamoho may carry these toxins downslope during intense storm events and impact human health, as well as the marine environment.”). The DEIS does not disclose hazardous substances, histories of spills, or other relevant information on uses of federal lands, despite these connections. Even if not on federal</p>	<p>The conclusion regarding constituents found in marine resources in the Makua nearshore not being unique to military training and that military training activities do not pose an increased risk to residents reliant on those marine resources for subsistence comes from the cited Mākua Marine Resources Supplemental Study Report; it is not a conclusion of the EIS.</p> <p>Section 3.6.5.3 assesses the potential impacts to marine resources associated with Army use at MMR.</p> <p>Reference to the discussion on seafood contamination in the Marine Resources Studies in Section 3.6.5.3 has been added to Sections 3.5 (Cultural Practices) and 3.12 (Environmental Justice).</p> <p>Section 3.6.1 and Appendix J have been revised to add the definition of operational ranges. Current management measures to mitigate potential impacts from hazardous substances and hazardous wastes are discussed in Section 3.6.5.</p> <p>Lease compliance actions and cleanup and restoration activities that would occur upon lease expiration are discussed in Section 4.2.4.</p>

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		<p>lands, “MEC, which consists of UXO, discarded military munitions, and MCs, is present on State-owned lands, primarily within the North Ridge, Center, and South Ridge Tracts at MMR.” Id. The Army continues to bring petroleum, oil, lubricants in aircraft and other vehicles, as well as solvents, paints, and adhesives onto state lands and does not disclose hazardous substances used on federal lands. DEIS at 3-149. These, in addition to historical contaminants, continue to pollute Mākua ecosystems. “Fish, shellfish, limu, [and the study assumed that other marine resources] near Mākua Beach and in the muliwai, on which area residents rely for subsistence, were contaminated by substances that are known to be associated with the proposed training at Mākua” DEIS at 3-150, quoting 2009 marine resources study (brackets in DEIS). That 2009 study further found “research department explosive (RDX, also known as Royal Demolition Explosive), perchlorate, arsenic, chromium, cobalt, nitroglycerin, and manganese” used at Mākua “may pose a potential health risk.” DEIS at 3-150. A follow up study in 2015 “study determined that several compounds associated with proposed military training activities at Makua were present in limu kohu, loli, he’e, and collected from near Makua Beach.” DEIS at 3-150. These “compounds included semivolatile organic compounds, organochlorine pesticides, perchlorate, ioxins/dibenzofurans, metals, and arsenic (inorganic and organic)” Id. at 3-151; 3-324. “[A] number of substances (four metals: arsenic, cadmium, cobalt, and manganese; two organochlorine pesticides: alpha-benzene hexachloride and heptachlor epoxide; and two explosives: nitroglycerin and perchlorate) detected in the marine resources were at concentration levels that pose a human health risk to area residents who rely on marine resources for subsistence.” Id. Despite these studies’ findings, the DEIS concludes “constituents found in marine resources in the Makua nearshore and muliwai areas are not unique to military training and military training activities do not pose an increased risk to residents reliant on those resources for subsistence.” DEIS at 3-238. The DEIS is required to disclose potential significant impacts, not speculate as to ways the Army’s</p>	

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		<p>actions might not be responsible for those impacts. Mākua Army training actions have contaminated nearshore waters and resources to an extent that risk the health of Hawaiian subsistence and cultural users of these resources. These contaminants are not isolated to state or federal lands. The DEIS does not assess these adverse impacts. Are these past impacts reversible, mitigatable or is the environment permanently impaired? The DEIS does not assess these significant impacts on nearshore ecosystems and the cultural traditions and customs that rely on them.</p>	
Bianca Isaki	KAHEA: THE HAWAIIAN ENVIROMENTAL ALLIANCE	<p>10. Affordable housing and other socioeconomic impacts not assessed. No military housing is available at KTA, Poamoho, or MMR. The Army proposes to continue operations (and possibly expand them) in areas of O’ahu with the greatest need for affordable housing. DEIS at 3-246 (North shore/ Ko’olauloa), at 3-252 (Central O’ahu), at 3-256 (Wai’anae coast). There will be a “deficit of approximately 1,100 homes in the North Shore neighborhood and 900 homes in Ko’olauloa neighborhood by 2040” (DEIS at 3-248); “a deficit of approximately 5,000 homes in the Central O’ahu neighborhoods by 2040” (id. at 3-253); and “a deficit of approximately 1,200 homes in the Wai’anae Coast neighborhood by 2040” (id. at 3-258) By comparison, the average for all of O’ahu will be a 500 home deficit. Id. Even assuming more housing will be constructed in these areas, the DEIS does not disclose whether any of the new housing will be affordable for those needing homes. Compare DEIS at 3-247, 3-253, 3-257. Though it lists existing “vacant” units, the DEIS does not disclose whether these units are used as investment/ vacation rental properties or are otherwise unaffordable for residents. In March 2022, the Department of Defense had 70,107 military and civil service personnel in Hawai’i, 15,603 of which were active duty Army personnel. DEIS at 3-248. The DEIS does not disclose whether existing military personnel are existing residents. Because the DEIS does not consider construction, modernization, or other changes, it does not disclose whether new military personnel will be deployed to these training areas. Most importantly, the DEIS nowhere addresses the impact of military</p>	<p>Sections 3.11.5.1, 3.11.5.2, and 3.11.5.3 discuss KTA, Poamoho, and MMR socioeconomic conditions, respectively. These sections discuss the housing supply for the three areas and note that demand for these areas shows a deficit. Additionally, the sections note that the Proposed Action would not result in population and growth impacts, and therefore there would be no new impacts on housing.</p>

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		<p>personnel outcompeting residents for new housing, especially market housing. Military housing allowances and cost of living adjustments put military personnel at a competitive advantage over many local residents searching for housing.[2 See Eric Pape, “Living Hawai’i: How military policies drive up rents on Oahu,” Civil Beat (Jun. 17, 2015) <a href="https://www.civilbeat.org/2015/06/living-hawaii-how-military-policies-drive-up-rents-onoahu/#:~:text=The%20high%20housing%20allowances%20place,above%20fair%20market%20rental%20prices.">https://www.civilbeat.org/2015/06/living-hawaii-how-military-policies-drive-up-rents-onoahu/#:~:text=The%20high%20housing%20allowances%20place,above%20fair%20market%20rental%20prices.</a>] The DEIS does not disclose socioeconomic impacts, which are one of the primary forces driving Kānaka Maoli to diaspora. The DEIS includes no responses to Hawai’i Peace and Justice’s cogent questions: How do military housing allowances affect the cost of housing on O’ahu? How do the inflationary economic pressures of military housing policies affect the affordability of housing for unsubsidized, non-military residents? How does the non-taxed income of military personnel affect State revenues? What is the economic impact of federal dependents on public services such as schools, social services, and infrastructure costs? DEIS V 3.1 at O-107</p>	
Bianca Isaki	KAHEA: THE HAWAIIAN ENVIROMENTAL ALLIANCE	<p>11. Greenhouse gas emissions deemed insignificant only by comparing to rest of the world. The DEIS is required to assess whether the Army’s retention of state lands will “emit substantial greenhouse gases.” HAR §11-200.1-13(b)(13). The DEIS is thus required to assess GHG emissions, not assessment of “impacts on the alternatives from ongoing changes to climate patterns; such impacts would be significant if future climate patterns impaired or precluded an aspect of an alternative.” DEIS at 3-162. First, the Army thus incorrectly asserts its “real estate” action is excused from this requirement and “a full life-cycle analysis of GHG emissions from non-scope considerations such as manufacturing and shipping of equipment and materiel, and troop movements to and from KTA, Poamoho, and MMR is beyond the scope of the EIS.” DEIS V.2 at E-30. The Army cannot cleverly restrict the scope of its action to “real estate” because it must address cumulative impacts. HAR §11-</p>	<p>The EIS has been prepared pursuant to Hawaii Administrative Rule (HAR) §11-200.1-15(b). Because the Proposed Action is purely an administrative action and would not change existing air emissions or GHG levels, it has been determined the Proposed Action itself would not emit substantial new GHGs. Additionally, a life-cycle analysis is not necessary for this EIS because no alteration or changes to air quality would be anticipated, as clarified in Sections 3.7.4 and 4.2 of the Final EIS. Therefore, the air quality and GHG analysis in the EIS is primarily qualitative.</p>

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		<p>200.1-13. And GHG emissions are one of those impacts. Id.(b)(13). The Army does not explain why it could not conduct a GHG emissions lifecycle analysis, which is a regular feature of environmental review in Hawai`i and in proceedings before the Public Utilities Commission pursuant to HRS §269-6(b). Second, the Army uses meaningless standards of: (1) “contribution to the cumulative impact of ongoing global climate change”; and, (2) whether “future climate change patterns impair[] or preclude[]” alternatives. DEIS at 3-162. Measured against the rest of the entire world, the Army concludes even if it took no action, the reduction in GHG emissions “would not meaningfully reduce the severity of global climate change given the extremely limited contribution of KTA’s GHG emissions to regional and global GHG inventories.” DEIS at 3-166, at 3-168 (same for Poamoho); at 3-171 (no action at MMR “would slightly concentrate the amount of criteria pollutant and GHG emissions in other areas of MMR.”). Also using the standard of worldwide impacts, the Army concludes their emissions including “off-site energy production, manufacturing and shipping equipment and materiel, agricultural processes, and troop movements” - “would not meaningfully contribute to the potential impacts of global climate change.” DEIS at 3-165. This fundamentally misunderstands how climate change operates and does not meet the purpose of an environmental disclosure document. Militaries are well-known for their significant contributions to GHG emissions across the world.[3 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-emissionshas-military-blind-spot-2023-07-10/">www.reuters.com/business/environment/worlds-war-greenhouse-gas-emissionshas-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-carbonfootprint#:~:text=What%20is%20its%20impact%20on,accounts%20for%20around%20%20percent.">www.aljazeera.com/news/2023/12/12/elephant-in-the-room-the-us-militarys-devastating-carbonfootprint#:~:text=What%20is%20its%20impact%20on,accounts%20for%20around%20%20percent.</a>] The Army does not explain</p>	

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		<p>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 meaningful analysis of the action’s GHG emissions, the DEIS fails in its primary obligation - to disclose significant impacts.</p>	
Bianca Isaki	KAHEA: THE HAWAIIAN ENVIROMENTAL ALLIANCE	<p>13. Native species significantly impacted by Army’s proposed “real estate action.” a. New listed species, habitats, and Army operations must be assessed. The Army is not consulting with the Fish and Wildlife service about native species impacts “because the action is a land retention (real estate) action that has no effect on listed species” but it is “preparing a Programmatic Biological Assessment (PBA) in consultation with USFWS. The PBA covers newly listed species and critical habitats with full consideration of Army training and operations.” DEIS V.1 at 3-44. Newly listed species and new critical habitats, in addition to any new Army operations, are “changed circumstances” that would require a supplemental EIS. A “project can become ‘an essentially different action’ in terms of its environmental impacts due to changed circumstances surrounding the project or the discovery of new information” Unite HERE! Local 5 v. City of Honolulu, 123 Hawai`i 150, 170, 231 P.3d 423, 443 (2010).</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. This draft programmatic Biological Assessment, and the subsequent Section 7 consultation process, is not a part of this EIS process.</p>
Bianca Isaki	KAHEA: THE HAWAIIAN ENVIROMENTAL ALLIANCE	<p>c. Merely listing species locations does not disclose and assess impacts to species. DEIS Appendix “H” consists in a list of species, their listing status, and their location. The DEIS attempts no assessment of impacts, for instance, on the ‘elepaio at Poamoho, which includes 4,349 acres of O’ahu ‘elepaio designated critical habitat and an additional 75 acres of O’ahu ‘elepaio designated critical habitat occur within the arbitrary 100 foot buffer. There are “17 protected bird species observed at, or with the potential to occur at, Poamoho”. DEIS at 3-70.</p>	<p>Discussion and analysis of native and protected species can be found in Section 3.3.5 and Appendix H.</p>
Bianca Isaki	KAHEA: THE HAWAIIAN ENVIROMENTAL ALLIANCE	<p>How do low flying helicopter operations in the Poamoho Natural Area Reserve, and critical habitat designated for ‘elepaio impact the species? What about the other 16 bird species? The DEIS summary of existing biological opinions and other documents not provided does not describe how species are threatened with impacts, rather</p>	<p>Additional noise studies that address impacts from operations that threaten native and protected species at Poamoho and MMR have been included in Sections 3.3.5, 3.8.5.2 and 3.8.5.3 of the Final EIS. Species analysis for</p>



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		<p>consisting in vague and general management measures. For instance, the 2008 Biological Opinion recommends the Army “[r]educe and manage invasive species impacts to protected species and critical habitat.” DEIS V.3.2 at PDF683/ F-7. None of these descriptions disclose potential significant impacts nor why impacts are not significant. “MMR contains more federally protected species than any other Army installation on O’ahu.” DEIS at 3-85. There are 102 plants and 30 wildlife species, of which 14 are protected species on state lands. The DEIS does not disclose what operations threaten these species nor how they are threatened. DEIS V 3.2 at PDF 647/ E-22. The DEIS also improperly focuses on species that may occur on state lands, despite the integral connection between Army operations on state and federal lands, and physical connections to nearby areas. See e.g. DEIS V 3.2 at PDF 647/ E-22. Of particular import are impacts to native and listed seabirds, including those at the James Campbell National Wildlife Refuge near the KTA site, which serves as a critical habitat for endangered waterbirds, migratory seabirds, endangered and native plant species, and the endangered Hawaiian Monk Seal, as pointed out by the Office of State Planning. DEIS V.3.1 at PDF 38. The DEIS discloses only species on state lands at KTA, which already include 136 plants and 53 wildlife species; of which 24 are protected. DEIS V 3.2 at PDF 647/ E-22.</p>	<p>Poamoho is provided in Sections 3.3.5.2. and 3.8.5.2; species analysis for MMR can be found in 3.3.5.3 and 3.8.5.3.</p> <p>The Proposed Action is a real estate action (retention of the State-owned lands) and does not include an analysis of U.S. Government-controlled land.</p>
Bianca Isaki	KAHEA: THE HAWAIIAN ENVIROMENTAL ALLIANCE	<p>c. Compliance with CERLCA does not mean lands will be cleaned up. The Army asserts “cleanup and restoration activities are separate from lease compliance actions, and are defined as remediation of any hazardous waste sites addressed through the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process.” DEIS at 2-3. Under the general rules for clean-up standards, CERCLA requires “a remedial action that is protective of human health and the environment, that is cost effective, and that utilizes permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent practicable.” 42 U.S.C. § 9621(b)(1) (emphases added). The Army discloses only it will “conduct MEC clearance</p>	<p>Section 3.6.1 and Appendix J have been revised to add the definition of operational ranges. Current management measures to mitigate potential impacts from hazardous substances and hazardous wastes are discussed in Section 3.6.5.</p> <p>Lease compliance actions and cleanup and restoration activities that would occur upon lease expiration are discussed in Section 4.2.4.</p> <p>Section 4.2.4 discusses the reasons why the lease compliance actions and cleanup and restoration</p>

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		<p>when applicable” and would later follow Army regulations to determine how and when the cleanup and restoration would occur in State-owned land not retained, following the CERCLA process.” DEIS at 3-159 (re: Mākua). Again, deferring identification of potential remediation actions and whether they may nevertheless require limitations on uses of State lands defeats the purpose of HEPA. Nowhere does the DEIS disclose the extent to which remediation is needed, whether and how CERLCA compliance would achieve full restoration of lands, and what the impacts may be of failing to fully restore lands. Will ongoing Army use of these lands irrevocably commit them to degradation and disuse for other purposes? Therefore, the DEIS does not assess whether and how the Army will comply with lease terms for clean up of these lands, nor the extent they will not be cleaned up. Because it fails to disclose and assess the extent to which Army use of the land will irrevocably commit to contamination, the DEIS is insufficient</p>	<p>activities after lease expiration, and any associated impacts with such activities, are not able to be determined at this time.</p>
Bianca Isaki	KAHEA: THE HAWAIIAN ENVIROMENTAL ALLIANCE	<p>b. Wildlife may be more sensitive, not “habituated”, to noise. The DEIS incorrectly states: “Birds and other wildlife have been documented as becoming habituated to aircraft overflights and other noises after continuous or frequent exposure. Therefore, most wildlife in the vicinity are expected to be habituated to noise associated with training activities.” DEIS at 3-181; at 3-50 (“birds and other wildlife have been documented to become habituated to aircraft overflights and other noises (e.g. artillery training) after continuous or frequent exposure (Shannon et al., 2016; USAG-HI, 2001a)”). As pointed out by the Center for Biological Diversity in regard to similar Army claims concerning Pōhakuloa Training Area impacts, dated June 7, 2024: 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</p>	<p>Additional noise studies that address impacts on native and protected species have been included in Section 3.3.5 and 3.8.5 of the Final EIS. Scientific noise studies conducted on wildlife provide different conclusions on habituation of wildlife to noise. The Army natural resources staff have documented wildlife habituation to noise associated with training activities; therefore, the conclusions within the EIS support less than significant impacts to wildlife species.</p>

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		<p>scientific research reviewed here provides considerable evidence that anthropogenic noise is detrimental to wildlife and natural ecosystems” (Shannon et al., 2016). Id. The National Park Service (NPS) maintains a database of research on the ways chronic stressors, including noise, can significantly impact wildlife.[4 4 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 wildlife communities.[5 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, including those due to disturbing noise. The DEIS concedes, “[n]oise can also cause wildlife startle, alarm, and alert behaviors, potentially causing rapid movement or flight in avoidance behavior” but anyway concludes Army operations will have no significant impacts to native and listed species. DEIS at 3-178. Lacking any evidence of benign noise impacts on wildlife, the Army has no basis for its “no significance” conclusion. Nor are noise level disclosures sufficient. The DEIS only discloses sound levels on state lands, as if sounds emitted from operations adjacent federal lands - the same operations that depend on state land retention - will not travel beyond TMK boundaries. DEIS at 3-175. Those sound impacts are not assessed.</p>	
Marissa Jacobs		<p>Growing up in Pūpūkea, I often heard "war games" off in the distance as I tried to fall asleep at night. Not only was it out of place, but it also really ruined the peacefulness of the country. Now, as an adult living in Mililani Mauka, <u>I hear the same flying bullets - but even louder. It's scary for our young kids. There are also numerous military planes that fly right above our house—back and forth up and down the mountain and sometimes quite low. Not only are they loud, but I always worry about our safety in our own neighborhood.</u> We did not know about this before we purchased</p>	<p>Monthly training advisories are published to alert the public and neighbors of upcoming training activities that are louder in nature and may be heard outside the military installation. In addition to these notifications, USAG-HI has established internal policies and standard operating procedures in an effort to minimize training noise and its impact on the community.</p> <p>The issue of noise and its effects on the neighbors</p>

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		our home. It is all disturbing and, as a local, I'd like to see (and hear) it all end.	<p>of KTA are discussed in Section 3.8.5.1 of the EIS. The EIS states that pilots and crew would continue to receive a briefing designed to minimize noise impacts on, and disruption to, local communities and neighborhoods as aircraft transit to and from KTA. Land retention could require further limitations associated with noise. Although this would be subject to negotiations, a possible result may be greater restrictions associated with noise than are currently required.</p> <p>To alert USAG-HI of a specific noise complaint, please call the Community Concern Line at (808) 787-1528 or send an email to <a href="mailto:usag.hawaii.comrel@army.mil">usag.hawaii.comrel@army.mil</a>.</p>
Ikaika James		My name is Ikaika. I want to emphasize that this should be a matter of consent and that the U.S., in this case the U.S. Army, has been ignoring our no for too long now. We've been saying no. We've been saying no to the -- to the way the U.S. Army has handled our lands leaving bullets and trash everywhere, no to the way the U.S. Army neglects our cultural practices and historic sites opting to prioritize state land, and no to the U.S. Army being on our lands. I prefer the no-action alternative. The U.S. Army should not retain any of these lands in Kahuku, Makua, or Poamoho, a'ole. Thank you.	Please see General Response.
Ikaikaonalani James		End the military leases! No Action Alternative is a must! We do not want the us army desecrating our 'āina any longer. We do not want to wake up to the sounds of your operations anymore. We do not want your trash— bullets, equipment, uniforms, and all! None of it! 'A'ole!	Please see General Response.
Dale Jensen		The United States Army , I have a long term rental unit attached to my primary residence. If the US Military was my tenant, there is no way I would extend their lease or provide any kind of positive recommendation to another landlord from whom the US Military attempted to rent property. Just look at the impact of the military	Please see General Response.

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		<p>as a tenant on Oahu. 1. Environmentally they are a disaster. They spew ammunition across the land and make no promise to fully clean it up. They dump dangerous chemicals, fuels and forever toxins into the soil, then deny it and force the landlord to take them to court in order to get them to admit their wrongs and begin to clean it up. Of course, by then the damage has been done and will be felt for generations by families island wide. 2. The military clogs our roads with their vehicles, both the military ones and those of the young men and women who are brought here to serve in the military. 3. The military fails to provide adequate housing for their service members on base, and then provides extraordinary rental allowances to their personnel to find rental property from within the private community. This takes up homes and apts that could otherwise be rented by locals and drives up the cost of all rentals due to high rent military families are able to pay. We have a housing crisis on these islands, and military seems oblivious to this fact. 4. The military are noisy neighbors. They operate equipment and conduct noisy operations at all times of day and night. 5. The military controls some of the best land on the island and has dominated it for generations. They provide little or no opportunities to tax paying civilians to access beaches, cultural sites or other facilities within their leased areas. No, if I was the military's landlord, I would not extend their lease. I would ask them to clean up their mess and get off my land. Who needs a tenant that comes with so many negatives. Dale Jensen</p>	
Brian 'loane' John		<p>Aloha. Aloha mai kakou. Mahalo, Aloha, Aloha mai kakou, o wau o loane, noho wau ma Kukaniloko, i Wahiawa me ku'u mau keiki. I wanted to share my perspective. I oppose completely all lease renewals. I wanted to highlight, too, who's getting paid to be here. Right? I look at that every time I come to these things, because I think that's really telling. Right? Like, look at all these people here, and how late it's getting, like me. My kids are at home right now, waiting for me. It's crazy, too, to have a time limit. When you're doing that with people, it's -- nobody likes it. So you should just let it go, because we're all supporting each other here. It's like -- it's</p>	Please see General Response.

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		<p>like fast food. Right? Fast food's not good for you. Fast information is even worse for you. So let it -- let it come out. All right? Some of these people have been doing this, like this tonight, their entire lives. And look at -- look at our kupuna here. Look how old they are. They've been doing this their whole lives. So, listen. All right? I grew up in California. I'm from America. I'm a guest here. So being a good guest is something I want the military to pay attention to, because I was also a service member. I did eight years in the US Army. I was stationed here at Schofield. I was a combat medic. I went to Iraq for a year, and fought hard. I went to Afghanistan for a year, and fought very hard. I got blown up several times. And I was there for what I was being told to -- I was deployed to fight for liberation for people. All right? But listen to everybody. Hear what they're saying. They're not free. So this -- it's very confusing, this paradigm. All right? And, you know, I see deployment patches, ma'am, sir. And so, you know, I know you guys were deployed, and you understand this insurgency that -- that we were in Iraq and Afghanistan fighting against. These people were embedded, fighting for their lives, for their home. You'll never win. You can never win that. It's something you have to understand, lessons learned from -- from all these different things that we keep trying to teach each other as we go through this. All right? So, you know, my kids, they're Kanaka Maoli. They belong to this place. I'm a guest here. This is my job now. This is my kuleana. This -- so -- so now I'm a soldier here, doing this, doing what I was trained to do, but in the -- in the right way. So I just wanted to leave you guys with this to -- you know, to understand that this isn't going to go away. And I know you're doing your jobs. And, you know, I -- I know you too, sir, Colonel McGunagle, and I appreciate you. You've done a lot of stuff in our community. And I know the notes you're taking, that you're going to bring back, and you're going to share that with your superiors. And I just wanted to thank you for your time. Mahalo.</p>	
Austin Johnsen		I am writing in opposition to the land retention of Kahuku, Kawailoa-Poamoho Training Area and Makua Military Reservation.	Section 2.3.3.1 has been revised to clarify that airspace use is independent of land retention, and

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		<p>The federal lands surrounding the military areas that are leased needs to be enough land to operate. In Hawaii land is scarce and the land that you have is all you need. I believe that the military is capable of being resourceful when given limited resources. The wars that the US army will be training for will be found on small islands. It is critical that the US military train in smaller area for their own benefit. As a comercial pilot that trained in Oahu I <u>know that the US military does not need the leased lands to commence the training that is need. the Military Operations Area depicted for Aeronautical training does not require the area below to be controlled by the military.</u> In addition MOAs do not need to permanent. Hawaii's Department of Natural Resources does not speak for the people of Hawaii as they are appointed and not ellected. Their actions are in the interest of the businesses that benefit from their decision. It is now up to the Army to make the correct decision to not continue leasing Hawaii lands. Hawaii's people need to be heard, and shown respect.</p>	<p>aviation training would continue over land not retained. In addition, Section 1.2.4 describes the importance of the O'ahu training areas to national defense.</p>
Austin Johnasen		<p>Aloha. My name is Austin Johnasen. I am from Kapolei/Makakilo. So I'm here in opposition of -- of the leased lands by the state to the federal government. The federal government already has enough land to exercise its missions. The -- if you think about it, what are the wars that you're trying to face? You're trying to face wars on small islands in the Pacific. Right? That's where you're looking at. Narrow your search. Narrow down what you're operating. That will help you better. But also, you're talking about helicopter training. I'm a commercial pilot. I know that the MOAs and the restricted areas, it's fine if somebody lives down there. You don't need to own that land to operate your helicopters there. So I believe that the reason why that the state -- you know, they're just passing it through; they're giving it to you to make the decision. The reason why is because they want the federal money. I think all of us here are fine not having the federal money. So please just use the land that you have, and we'll talk about taking that land back later. Thank you.</p>	<p>Please see General Response.</p>

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Emma Kaahaaina		We need to stop the desecration of our ‘Āina by the US military. They have poisoned our waters and continue to bring destruction wherever they go. We cannot let their occupation continue.	Please see General Response.
Clyde kaaiakamanu		We want our land back. It is our land for our people. We are not American! We are native Hawaiians. We deserve the right to be heard and counted for, not as only individuals but as it's own entity in itself. We are now a minority in our own home! How would you feel if you were being forced out of your own home that's been there for 1000s of years!? Give us back our home we do not want you here.	Please see General Response.
Joshua Kaakua	Protect Kaho'olawe 'Ohana	<p>Re: U.S. Army Draft EIS for the Retention of Ceded lands on O’ahu                      The Protect Kaho’olawe ‘Ohana offers the following testimony, in three points below, regarding the U.S. Army’s Draft Environmental Impact Statement for “Army Training Land Retention of State Lands at Kahuku Training Area, Kawaioloa-Poamoho Training Area, and Makua Military Reservation, Island of O’ahu”.</p> <p>The Protect Kaho’olawe ‘Ohana is a grassroots nonprofit organization formed in 1976 dedicated to the island of Kaho’olawe and the principles of Aloha ‘Āina throughout Hawai’i. In our work to heal Kaho’olawe, we strengthen our relationship with the land and pay respect to the spirits of the land. On our other Hawaiian islands, we work to protect the natural and cultural resources of our ancestral lands.</p> <p>1) Regarding Makua Military Reservation, the Protect Kaho’olawe ‘Ohana opposes any U.S. Military retention of leased state-owned land at Makua Military Reservation, and demands the U.S. Army return all U.S. Military-owned land at Makua Military Reservation to the State of Hawai’i to be held in trust until the formation of a sovereign Hawai’i governing entity at which time the land will transfer to the sovereign Hawai’i governing entity.</p> <p>This demand is not radical. It is restorative. A full U.S. Army funded cleanup and return of Makua to the State as temporary trustee is appropriate and just, has been done before with Kaho’olawe as a model, and must happen now. The federally owned and leased land is riddled with ordnance, scattered with ruins and fragments of</p>	Please see General Response.



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		<p>bombed cultural sites and burials, and empty of its traditional caretakers except for infrequent scheduled visits allowed by the Army. The return of U.S. Army owned land, and the non-renewal of State leases in Makua would still not meet the environmental justice principles of the Biden-Harris Administration. But, it is the next right step towards justice.</p> <p>Kaho'olawe and Makua share a similar plight. Both are sacred sites of irreplaceable cultural significance to the Native Hawaiian people. Both were taken by the U.S. Military for live-fire use during WWII between 1941-1942, during the period of time when the U.S. declared Hawai'i one of its "territories" following the illegal U.S.-backed overthrow and occupation of Hawai'i in 1893. In 1941, the U.S. Navy sequestered Kaho'olawe for use as a live-fire training area. And in 1942, the Army issued a Real Estate Directive for 6,000 acres in Makua.<sup>1</sup> This allowed the Army to obtain ceded lands controlled by the Territory through Territorial Governor consent, and private lands through condemnation. Eventually, the Army acquired through condemnation all of the kuleana parcels in Makua Valley, removing ancestral families. As for Makua's territorial lands, the Territory of Hawai'i, run in large part by the same American businessmen that illegally overthrew the Hawaiian government, issued Revocable Permit No. 200 to the Army, which was only supposed to allow the Army to occupy and train in Makua Valley and surrounding areas for the duration of the war plus an additional six months. However, the Army has retained occupation of Makua to present day due to a series of agreements made between the Army and the Territory, and then the Army and the State of Hawai'i, and also due to all parties allowing the Army to occasionally act outside of the terms of those agreements.</p> <p>From 1941 onward, the U.S. Navy bombed and shelled Kaho'olawe, and the U.S. Army conducted ordnance training at Makua to such extremes that the following was written in 1956 by the U.S. Army Corps of Engineers to Territorial Governor Samuel Wilder King "I feel it my duty to remind you that the Makua impact area is the most heavily dud contaminated area in the Hawaiian Islands with</p>	

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		<p>the possible exception of Kaho’olawe Island.”                      In 1959, Hawai’i became the 50th state, and all ceded lands occupied by federal agencies were to become state property within five years of statehood unless “set aside” for continued federal occupancy. With a goal of minimizing the lands that the federal government would “set aside” for continued federal occupancy and ownership, the State of Hawai’i and the federal government then entered into long-term (65-year) leases which would allow the state to have ownership of the land, and the military to continue use.</p>	
Joshua Kaakua	Protect Kaho'olawe 'Ohana	<p>In 1964, the State of Hawai’i issued 65-year leases for only \$1 for Makua, Kawaioloa-Poamoho, Kahuku, Pohakuloa on Hawai’i Island, Barking Sands on Kaua’i, and other facilities. The federal government still issued Executive Order 11166 “setting aside” for the U.S. Military’s use (and thereby taking ownership of) the inland areas of Makua Valley and other sites. The result was that through state leases, condemnation, or set asides, the U.S. Army controlled Makua Valley. In 1965, in an egregious breach of fiduciary duty, the State Board of Land and Natural Resources agreed to discharge the federal government from any liability for restoration of the 6,600 acres in Makua used by the military.</p> <p>In January 1976, nine brave men and women landed on Kaho’olawe to protest the continued bombing of the island. Continued advocacy eventually led to stopping the bombing, a partial cleanup, transference of Kaho’olawe to the State as temporary trustee, and a continued co-stewardship arrangement with the community through Protect Kaho’olawe ‘Ohana.</p> <p>In February 1976, O’ahu community members gathered at Makua for a rally to protest the military’s continued occupation and use of Makua Valley for live fire training. The group Mālama Makua formed and has continued to advocate for an end to military use, military cleanup, restoration and return of Makua to the community. It has been 48 years. The time for Makua’s complete cleanup and return is now.</p> <p>The territorial, state and federal actions and decisions described above were done many years ago, before the U.S. signed the United</p>	Please see General Response.

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		<p>Nations Declaration On The Rights Of Indigenous Peoples, before state and federal environmental and historic preservation laws, before the Apology Resolution, before the resurgence of ‘āina restoration throughout Hawai‘i.</p> <p>All of you - the decision makers of today, have a different understanding of the world, and realize the rights of Native Hawaiians as the indigenous people of Hawai‘i, the urgent climate crisis, and our collective responsibility to care for our lands and waters that sustain current and future generations. We implore the federal and state governments of today to take the next pono step forward.</p> <p>Kaho‘olawe provides a model for the return and restoration of Makua. In 1994, the U.S. Navy transferred title of Kaho‘olawe to the State of Hawai‘i. The Hawai‘i Revised Statutes § 6K provides that, "Upon its return to the State, the resources and waters of Kahoolawe shall be held in trust as part of the public land trust; provided that the State shall transfer management and control of the island and its waters to the sovereign native Hawaiian entity upon its recognition by the United States and the State of Hawaii." In 2003, the U.S. Navy returned access control to the State of Hawai‘i in a ceremony at ‘Iōlani Palace. Significant funds were also appropriated by Congress for the unexploded ordnance cleanup, although the promise of a 30% subsurface and 100% surface cleanup remains to be fulfilled.</p> <p>Though there remains much restoration to do on Kaho‘olawe, and complete restoration is not possible due to the demolished aquifer from a massive bomb, the ecosystem restoration and cultural reconnection efforts of Protect Kaho‘olawe ‘Ohana and in partnership with the State Kaho‘olawe Island Reserve Commission can be a model for a nonprofit such as Mālama Makua to work with the State as co-stewards of Makua if they so choose. The Protect Kaho‘olawe ‘Ohana has reconnected thousands to Kaho‘olawe through cultural access and education. We have worked in partnership with the State Kaho‘olawe Island Reserve Commission to slow erosion on the degraded landscape, replant natives, and</p>	

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		<p>bring life back to Kaho’olawe. I Ola Kanaloa! Our timeline of the history of Kaho’olawe can be found here:  <a href="http://www.protectkahoolaweohana.org/history.html">http://www.protectkahoolaweohana.org/history.html</a>.                      Given the plight of the Native Hawaiian people and their Nation, and the environmental and cultural injustice inflicted upon Makua and its descendants, rather than a regular conveyance of all military leased and owned parcels in Makua to the State Department of Land and Natural Resources, it would be more appropriate to use similar language from the Kaho’olawe conveyance document to the State whereby title to Kaho’olawe was transferred to the State of Hawai’i to be held in trust until for eventual transfer to a sovereign Native Hawaiian entity. Under International Law, Hawai’i’s sovereignty still exists whether or not recognized by the U.S. government. Therefore, while the intent is the same as the Kaho’olawe conveyance documents, language changes for the Makua conveyance documents may be appropriate.                      To summarize PKO’s position on Makua Military Reservation:                      * No new or extended state leases. * Full federally funded cleanup of all of Makua Military Reservation. *Conveyance of title of all U.S. Military-owned parcels in Makua to the State of Hawai’i to be held in trust until the formation of a sovereign Hawaiian governing entity at which time Makua would transfer to the sovereign Hawaiian governing entity. * Complete closure and return of Makua Military Reservation. *After an efficient and comprehensive cleanup of Makua Military Reservation funded by the U.S. Military, absolutely no U.S. Military presence in Makua.</p>	
Joshua Kaakua	Protect Kaho'olawe 'Ohana	<p>2) Regarding Kawailoa-Poamoho and Kahuku Training Areas, as well as the Pohakuloa Training Area on Hawai’i Island, the Protection Kaho’olawe ‘Ohana: * Opposes Alternative 1 (Full Retention) * Urges the military to listen to and change its plans and actions based on feedback of the community so that this NEPA EIS process is not a surface exercise in consultation, but a genuine effort to protect environmental and cultural resources, and achieve the federal environmental justice goals. * Supports decreasing the training area footprints and boundaries further than Alternative 2,</p>	Please see General Response.

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		<p>including examining transferring title of U.S. military-owned land within the above three training areas to the State of Hawai'i or sovereign Hawai'i governing entity once formed. This examination of the appropriateness of continued U.S. Military ownership is in line with the environmental justice principles. The U.S. Military-owned lands should be put on the negotiating table not for a land swap but for direct conveyance to the State at no cost considering that approximately 175 square miles of U.S. Military owned lands are ceded, and those lands became U.S. military owned in the shadow of illegal occupation. * Supports the efficient, comprehensive, and U.S. Military-funded, cleanup of all past and recent ordnance.</p>	
Joshua Kaakua	Protect Kaho'olawe 'Ohana	<p>3) The Protect Kaho'olawe 'Ohana has one overarching comment which applies to the Army's Kahuku-Poamoho-Makua DEIS, the Army's Pohakuloa DEIS, and any U.S. Military environmental review of retention of State of Hawai'i leased land expiring in or around 2029:</p> <p>Neither the DEIS for Kahuku, Poamoho and Makua, nor the DEIS for Pohakuloa adequately assess the direct, indirect, secondary and cumulative climate-related impacts of retention. The federal government has recognized that we are in a climate crisis requiring urgent changes and action to ensure long term security and survival. The federal government has recognized the importance of environmental justice in federal agency decisions and actions. Yet, the aforementioned Draft Environmental Impact Statements do not evaluate the opportunity loss costs of retention, where state lands could be used for carbon sequestration through native reforestation and ecosystem restoration, or regenerative farming to decrease Hawai'i's dependence on imports and associated greenhouse gas emissions. The Draft Environmental Impact Statements also do not evaluate the retention risk of continued greenhouse gas emissions and climate destabilization from transportation emissions, bombing and live fire on land and in the ocean, and continued environmental degradation in the context of</p>	<p>The Proposed Action is a real estate action and would not alter the currently leased lands; therefore, the air quality and GHG analysis in the EIS is primarily qualitative, as clarified in Sections 3.7.4 and 4.2 of the Final EIS. The qualitative analysis does not include live-fire training on MMR because these activities have not occurred since 2004.</p>

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Taylor Kaaumoana		<p>a warming climate. The Draft Environmental Impact Statements also do not evaluate how to mitigate these serious climate impacts.</p> <p>Mahalo. For the record, my name is Taylor Kaaumoana. And this goes directly to your higher-ups, so please take notes, the notes for input, and also to the legislatures for Hawaii, all the way to Josh Green. I am in strong opposition to EIS in all forms, proposing mitigation to protect the environment, and to amend the EIS draft to <u>update the land study bureaus and to partner with them, LSB, to be done on all acres the Army and each military branch utilized in Hawaii, insert testing per 1 to 2 miles on every acre, highly proposed, where each is specifically, for public record, natural resources where the water is, and connecting lands, and where native species reside. The environmental impact statements should strike out any environmental referred sources that is over five years old or older. Add to the next draft current environmental studies, and report specific damages that will take 15-plus years to heal, rehabilitate lands, or to at least Class D lands. Amend EIS draft to insert every location, acre, and land that is a total loss, which includes lead poisoning, radiation, nuclear trash, et cetera.</u></p>	<p>Land Study Bureau work and the impacts on lands unrelated to the Proposed Action are outside the scope of this EIS.</p>
Taylor Kaaumoana		<p>Amend -- and to require a newsletter, from the DOE and all military branches, that they will be funding -- that we will have specific departments. When the EIS funds the next drafts, resolutions, and hearings and final hearings, may that all be sent to each resident of Honolulu County and each county on every island . And the rest of my time goes to her. Sorry.</p>	<p>Please see General Response.</p>
William Kahapea		<p>The Army's presence on our island must be drastically minimized due to its severe environmental impact and disrespectful treatment of the land. The destruction from live-fire training, particularly on Kaho’olawe, stands as a glaring example of the damage inflicted. Our island's scarce resources cannot endure further degradation. The existing training facilities are more than adequate, rendering the retention of Kahuku, Poamoho, and Makua redundant and counterproductive for Hawaii's residents. I strongly oppose the renewal of any of these leases.</p> <p>The military presence in Hawai'i transforms our islands into a prime</p>	<p>Please see General Response.</p>

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		<p>target amidst escalating global conflicts, such as the war in Ukraine, the Israel-Palestine strife, and new alliances like those between Russia and North Korea. Rather than safeguarding us, the US military's presence heightens the risk to Hawai'i, both from external threats and internal instability.</p> <p>To frame this proposal as a simple "real-estate" transaction is deeply disrespectful. What is at stake is not just land but a further 65 years of disconnection from our heritage, forcing three more generations to witness the desecration of our ancestral sites for the practice of war. This cannot be allowed to continue.</p>	
Matthew Kahoopii		<p>Aloha To All I Stand In Agreement With You Thomas Joseph Lenchanko I Oppose The Proposed Undertaking All Land , In The Pacific Islands Of The Archipelago , All Crown Land Belongs To The Sovereign Kingdom Of Hawai'i We Have Made A Claim With All Four Monarchy Flags : Queen Liliuokalani Royal Standard Flag 4 x 12 Original Authentic Dimensions Flag Flown At Hawai'i State Capitol Building June 11th , 2024 , Signed &amp; Certified By : State Of Hawai'i Govenor Joshua Booth Green M.D. &amp; Autographed By : The Minister Of The Interior Matthew Marshlo Kaho'opi'i M.O.I. Queens Liliuokalani Royal Standard Flag 4 x 8 Monarchy Dimensions Flag Flown At Hawai'i State Capitol Building June 11th , 2024 , Signed &amp; Certified By : State Of Hawai'i Govenor Joshua Booth Green M.D. &amp; Autographed By : The Minister Of The Interior Matthew Marshlo Kaho'opi'i M.O.I. Queen Liliuokalani Royal Standard , Salvage Title Flag 4 x 8 Monarchy Dimensions Flag Flown At Hawaii State Capitol Building June 11th , 2024 , Signed &amp; Certified By : State Of Hawai'i Govenor Joshua Booth Green M.D. &amp; Autographed By : The Minister Of The Interior Matthew Marshlo Kaho'opi'i M.O.I. Kaho'opi'i Ohana Liberty Of Peace Flag 4 x 8 Monarchy Dimensions Flag Flown At Hawai'i State Capitol Building June 11th , 2024 , Signed &amp; Certified By : State Of Hawai'i Govenor Joshua Booth Green M.D. &amp; Autographed By : The Minister Of The Interior Matthew Marshlo Kaho'opi'i M.O.I. Mahalo Nui Loa Ua Mau Ke Ea Oka Aina Oke Akua UAMAU KE EA O KA AINA I KA PONO Matthew Marshlo Kaho'opi'i The Kingdom Of Hawai'i Hawai'ian Kingdom Minister Of The Interior</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		Lineal Descendant Royal Heir House Of Nobles E: [REDACTED] ShoShannah Shanwakee Lee Thomas The Kingdom Of Hawai’i Hawai’ian Kingdom Counselor Minister Of The Interior E: [REDACTED]	
Matthew Kahoopii	The Sovereign Kingdom of Hawai’i   The Minister of the Interior	The Memorandum Of Agreement And Notice Regarding Access To The Schofield Barracks Military Reservation West Range Haleauau Heiau And Burial Site Disturbances 2000-2010. We as The Lineal Descendants Royal Heirs House Of Nobles Of The Hawai’ian Kingdom Council The Sovereign Kingdom Of Hawai’i Government Speak To You on Behalf Of the Hawai’ian People: "We As The Subjugated: As Undersigned Are Grateful For This Unique Opportunity Which Is Not To Be Rare: As It Is Unique: To Access Our Sacred Homeland At The Schofield Barracks Military Reservation West Range Haleauau Heiau Burial Site Currently In a State Of Distress Devastation & Disturbed Display Of Military Contamination Of Live Round Casings Military Tanks Desecrating These Sacred Lands That Prior To 2000-2010 These Lands Are Loi Fields Once Filled With Taro And The Land Perpetuates The Righteousness Of Life, The Blood Cries Out, And The Bones Cry Out For Reparation & Restoration: To The Kingdom Crown Glory Of the Kingdom Of Heaven And The Kingdom Of Hawai’i That The LORD God JE-HO-VAH Our Heavenly Father Be Glorified In Our Government To Government Relationship Moving Forward In Peace And Reconciliation And Prosperity In Our Own Sovereign Lands As The United States Of America And The United States Of America And the United States Military And The State Of Hawai’i By The Act Of Congress Enter Into A Treaty Of Peace With The Sovereign Kingdom Of Hawai’i & The Hawai’ian Kingdom Council Government To Restore Repair Return The Crown Land Of the Kingdom To The Lineal Descendants Royal Heirs House Of Nobles & The Minister Of The Interior Matthew Marshio Kaho’opi’i, I As The Minister Of The Interior Of The Kingdom Of Hawai’i, Will Be Happy To Work With You As The Consulting Party & Move Forward Together In Unity In A Government To Government Relationship As	Please see General Response.



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		<p>The Attorney General Contract States: The Attorney General Must Work With The Hawai’ian Kingdom Minister Of The Interior And The Kingdom Marshal,                      Together, To Establish Open Doors: Open Gates: Open Access: For The Kingdom Of Hawai’i To Be Free From All Forms Of Bondage Subjugation Rejection Poverty And To Prosper In Their Own Land, According To Reference To House Bill HB2777:                      HB2777, A Bill For An Act Ceded Land Revenues; OHA Description: Makes A \$15,100,000 Appropriation To OHA In Ceded Land Revenues. Creates A Joint Advisory Committee To Study Alternative Approaches To Payment Of Ceded Land Revenue To OHA. Makes An Appropriation To The Attorney General To Provide Logistical And Staff Support For The Joint Advisory Committee. House Of Representatives Twenty Second Legislature 2004 State Of Hawai’i HB . No. 207777 A Bill For An Act Relating To The Office Of Hawai’ian Affairs. Be It Enacted By The Legislature Of The State Of Hawai’i: Section 1. “The Legislature Find That By Many Measures, The Descendants Of The Inhabitants Of The Hawai’ian Islands Prior To 1778, Have Not Prospered In Their Native Land.”                      Reference To State Vs. Hanapai Cite As 89 Hawai’i 177 1998 Page 177 970 P. 2 D 458 State Of Hawai’i, Plaintiff—Appellant . V. Alapai Hanapai, Defendant—Appellant No. 19746 Supreme Court Of Hawai’i. Nov. 20, 1998. Reconsideration Denied Feb 8.1999.”                      Reference To 174C-101 Native Hawai’ian Water Rights (C)                      “Traditional And Customary Rights Of Ahupua’a Tenants Who Are Descendants Of Native Hawai’ians Who Inhabited The Hawai’ian Islands Prior To 1778 Shall Not Be Abridged Or Denied By This Chapter. Such Traditional And Customary Rights Shall Include, But Not Be Limited To , The Cultivation Or Propagation Of Taro On Ones Own Kuleana And The Gathering Of Hihiwai, Opae, O’opu, Limu, Thatch, Ti Leaf, Aho Cord, And Medicinal Plants For Subsistence, Cultural, And Religious Purposes.                      Access To Our Sacred Homelands And Sacred Family Burial Sites &amp; Memorials Locations In The Entire Region Of The Archipelago &amp; The Pacific Islands Within Lihue Waianae Uka Oahu MokuPuni .</p>	

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		<p>In Furtherance To The Above And Nonetheless We The Sovereign Kingdom Of Hawai’i Make This Notice Today Clean &amp; Concise And Not Plan We Are Not In Agreement With The Prolonged And Illegal Occupation Of The Sovereign Kingdom Of Hawai’i As A State And Territory Controlled Subjugated Managed And Mismanged By The United States Corporation / The Department Of Defense / DoD / Space Form Command: The Unites States Armed Forces Military / Army / Navy / Air Force And RIMPAC.</p> <p>Therefore In Accordance With The Above We Choose To Express Our Appreciation For The New Leadership Of The New Colonel Rachel Sullivan Of The United States Army</p> <p>Beginning Friday 19th July 2024 And Appreciation To The Work And Effort Of The Previous Colonels In Position On Rotation Every Four Year Term We Appreciate The Effort Currently In Demonstration To Improve The Work With Our Families To Protect And Preserve Our Families Sacred Burial Sites, Work, Art, Science, Spiritual Beliefs, Customs And Religion We Remind All Of President Grover Cleveland Order: Regarding The Illegal Action Circa January 1893: To Repair Restore Return All Crown And Hawai’ian Kingdom Government Crown Land To The Kanaka Maoli, Native Hawai’ian Kingdom Government Crown Land To The Kanaka Maoli, Native Hawai’ian, People To Restore Honor Peace Prosperity And Reconciliation. To The Sovereign Kingdom Of Hawai’i And Release All To Be Free Of Subjugation. Moving Forward With A Clear Path With The Sovereign Kingdom Of Hawai’i Government Working With The US Military And US Government In A Government To Government Relationship With The State Of Hawai’i Consulting The Minister Of The Interior Of The Hawai’ian Kingdom In All Matters.</p> <p>I Hereby Give Notice That Upon Receipt Of This Letter: This Notice Requires Your Response &amp; Reply Within 7 Days By The Grace Of God JEHOVAH I Trust You Will Respond</p> <p>I, Matthew Marshio Kaho’opi’i The Minister Of The Interior Of The Sovereign Kingdom Of Hawai’i/Hawai’ian Kingdom/Archipelago Authorize and Approve and Autograph With My Seal And My Blue Thumb Print and Oath Of Covenant This Day 25th July, 2024,</p>	

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		<p>3:33pm With All Respect Without Ill Will &amp; Without Frivolity                      Autograph: OATH OF COVENANT LIBERTY OF PEACE Ua Mau Ke Ea                      Oka Aina Oke Akua Matthew Marshio Kaho‘opi‘i Minister Of The                      Interior M.O.I The Sovereign Kingdom Of Hawai‘i Gods Covenant :                      The Hawai‘ian Kingdom Council Lineal Descendants Royal Heirs                      House Of Nobles E. [REDACTED] [REDACTED] Melissa                      Kawehimakamaionalani Kaho‘opi‘i Minister Of The Finance The                      Sovereign Kingdom Of Hawai‘i Gods Covenant : The Hawai‘ian                      Kingdom Council Lineal Descendants Royal Heirs House Of Nobles E:                      [REDACTED] [REDACTED] ShoShannah Shanwakee Lee Thomas                      Counselor Minister Of Interior The Sovereign Kingdom Of Hawai‘i                      Gods Covenant : Hawai‘ian Kingdom Council E. [REDACTED]                      [REDACTED] The Sovereign Kingdom Of Hawai‘i Gods Covenant :                      The Hawai‘ian Kingdom Council The House Of Nobles : Paki :                      Kaho‘opi‘i : Ho‘opa‘i Heirs Alber Jr Kaneheili Kaho‘opi‘i E:                      [REDACTED] [REDACTED] Dale Clamet Paki Ho‘opa‘i E: [REDACTED]                      [REDACTED] Sheldon Sr Kalani Kaho‘opi‘i E: [REDACTED]                      [REDACTED]</p>	
Tevita Kaili		<p>My name is Dr. Tēvita O. Ka‘ili. Originally from Tonga, I am now a resident of Kahuku. Having lived in Ko‘olauloa, specifically Lā‘ie and Kahuku, for over 20 years, I am also a professor of anthropology and cultural sustainability at Brigham Young University Hawai‘i. More significantly, I hold the ancestral title "Maui," the same title held by the ancient Maui, a common ancestor for Hawaiians, Tongans, Māoris, Sāmoans, Tahitians, Cook Islanders, and many Moanans in Oceania. Maui and Hina are my 36th great-grandparents, establishing over a thousand years of my ancestral ties to this ‘āina (land) and to the rest of Moananuiākea (Oceania). As a direct descendant of Maui and Hina and the contemporary holder of the Maui title, I vehemently oppose the renewal of the military lease on this Kahuku Training Area (KTA). Hawaiian mo‘olelo recounts that Kahuku was an ‘āina lewa, a floating land, until one day, our ancestor Maui (or Hina in other versions) captured and securely anchored it to Ko‘olauloa, O‘ahu with sennit cordages (‘aha) and two massive hooks, Pōlou and Kalou. These</p>	Please see General Response.

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		<p>hooks were attached to the Pōlou Pond in Kahuku and the Kalou Pond in Waiale’e. The Pōlou pond housed a Kanaloa stone nearby, and the Kalou pond housed a Kāne stone in its vicinity (McAllister, 1933, Archaeology of Oahu, p. 152, 155). Thus, Kahuku is sacred land to my ancestors Maui and Hina as well as Kāne and Kanaloa. According to the Cultural Impact Assessment (CIA) portion of the EIS, there are six wai (freshwater) sources in the KTA project area (see Appendix B. 4.1.1.1). Two of these freshwater sources, Waiale’e and Pahipahi’ālua streams, impact the Kalou pond, where Maui placed his Kalou hook to anchor Kahuku to O’ahu. This impact is evident when it rains, as waters from the KTA project area flow down to Kalou Pond. As a kia’i (protector) of all the ‘āina and cultures of Maui and Hina, I cannot risk the contamination of Kalou Pond or the six freshwater sources on KTA by renewing the military lease. Therefore, I strongly oppose this renewal to protect the wai (water) sources for current and future generations. We must avoid repeating the desecration and poisoning of the wai at Kapūkakī, Red Hill. The Akua (Deified Ancestors) Kāne and Kanaloa created many of Kahuku's waters. Wai (waters) are gifts from Akua; therefore, we must guard them with our lives. The U.S. Military has not been a good neighbor or steward and has never returned Hawaiian lands in healthy condition. The U.S. Military is an illegal occupier, having participated in the overthrow of the Hawaiian Kingdom, and continues to occupy Hawai’i through their bases and exercises, like RIMPAC, which desecrate and destroy the land, the sea, and marine life of Hawai’i. Lastly, it is appalling to use the sacred ‘āina of Kahuku (and Mākua, Kawailoa-Poamoho, Pōhakuloa, etc.) to train soldiers to go abroad and kill people. U.S. Military training in Hawai’i commits ecocide (destroying the ecology) and ethnocide (erasing culture) of Hawai’i in preparation for genocide, as seen in the plight of Indigenous Palestinians. This is hewa loa! It is time for the U.S. Military to clean up the Kahuku Training Area, Mākua, Kawailoa-Poamoho, Pōhakuloa and return the lands stolen from the Hawaiian Kingdom to the Kānaka ‘Ōiwi. Kū Kia’i O’ahu, Kū Kia’i Palesetina</p>	

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Tevita O. Kaili		<p>[Tongan] Tapu moe aina Maui o Kahuku mu'a, peo mohono kanaka 'aui, talo mei mua. Ka ae'a ta peongofua e ha'o fanga, ke talanoa ke fonua o maui mohina. I begin with a tongue and salutation paying homage to the deep respect to the sacred aina of Kahuku, known in Hawaiian mo'olelo as Aina Maui, or the land of our deified ancestor Maui. My name is Dr. Tevita O. Kaili. Originally from Tonga, I'm now a resident of Kahuku, having lived in Kahuku for over 20 years. I'm also a professor of anthropology and cultural sustainability at the Brigham Young University nearby. More importantly, I hold the ancestral title Maui, the same title held by ancient Maui, a common ancestors for Hawaiian, Tongans, Maoris, Samoans, Tahitian, Cook Islanders, and many of the people of Maui Nui. Maui and Hina are my great- grandparents, establishing me as having thousands of years of ancestral tie to this aina and to the rest of Mauna Kea. As a direct descendant of Maui and Hina and a contemporary holder of the Maui title, I vehemently oppose the renewal of the military lease on this Kahuku Training Area. Hawaii mo'olelo recounts that Kahuku was a aina lewa, a floating land. Until one day, our ancestor Maui -- or Hina in other versions -- capture and securely anchor it to Ko'olauloa with a sinew cordage, a aha, and two massive hooks, Palolo and Ko'olau. According to the cultural impact assessment portion of the EIS, there are six wai, freshwater sources, in this KTA project area. Two of these freshwater sources, Waialea and Pahipahi'alua streams, impact the Ko'olau pond, where Maui placed his ko'olau hook to anchor Kahuku to Oahu. This is an important impact that many of us see when it rains heavy rains here. As a kiai protector of all the aina and culture of Maui and Hina, I cannot risk the contamination of Ko'olau pond on the six -- or any of the freshwater sources at KTA. Therefore, I strongly oppose the renewal. to protect the wai, sources of current and future generation. We must avoid repeating the desecrating and poisoning of the wai at Red Hill. The U.S. military has not been a good neighbor or steward, has never returned Hawaiian lands in healthy condition.</p>	<p>Existing management measures the Army adheres to in order to minimize impacts to water resources are discussed in Section 3.10 and Appendix J.</p>

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Tevita O. Kaili		The U.S. military is an illegal occupier, having participated in the overthrow of the Hawaiian Kingdom and continue to occupy Hawaii through their military bases and exercises like RIMPAC, which desecrate, destroy the land, the sea, the marine life of Hawaii. Lastly, it is appalling to use the sacred aina of Kahuku, Makua, Kawailoa, Poamoho, Pohakuloa, and any of the bases to train soldiers to go abroad and kill people. U.S. military training in Hawaii continues ecocide, destroying the ecology, and ethnocide, erasing the culture of Hawaii in preparation for genocide as seen in the plight of indigenous Palestinians. This is hewa loa. It is time for the U.S. military to clean up the Kahuku military area, Makua, Kawailoa, Poamoho, Pohakuloa, and any other bases and return the land stolen from the Hawaiian Kingdom to the Kanaka O’iwi. Kū kia’i O’ahu and Kū kia’i Palestina.	Please see General Response.
jasmyn kaiwi		i oppose!	Please see General Response.
Kyle Kajihiro	Hawai’i Peace and Justice	The Army DEIS is an improper instrument for guiding State decision making affecting public trust lands. The Army, as petitioner, and the State, as trustee for the lands in question, have fundamentally different interests and obligations with regard to the public trust lands in question. As the petitioner, the Army has an interest in findings that minimize the significance of its impacts in order to present a more favorable proposal to the State. While a NEPA analysis may fulfill the Army’s legal obligations in order to reach a record of decision, the State has a different set of obligations, and higher standards of care, with regard to the lands in question. The State has a trust obligation to protect the land and environment, including cultural resources. The State cannot rely on the Army’s land use proposal and environmental analysis. As trustee, the State must conduct its own planning process and environmental impact analysis based on its duty to mālama ‘āina, as stated by Judge Gary Chang in Clarence Ching and Mary Maxine Kahalelio vs. Suzanne Case (2018): Public trust lands are state-owned lands that are held for the use and benefit of the people in general of the State of Hawaii. The State of Hawaii is the trustee of these public lands in the public trust. The trustee of the public lands trust has the highest	Please see General Response.

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		<p>duty to preserve and maintain the trust lands. This duty is broadly coined in the concept of "malama 'aina"—to care for the land. (Clarence Ching and Mary Maxine Kahalelio vs. Suzanne Case 2018) Therefore, the State cannot make responsible decisions about these lands without considering its own land management obligations and what care the land requires.</p> <p>Scoping issues The DEIS treats each parcel as discrete objects of analysis. However, as the Army’s own documents indicate, these sites are integral to an entire network of logistical, training, and operational sites. So the scope of the analysis must consider how the retention of training lands will enable activities on other sites and produce impacts at these other related sites. Therefore the scope of analysis extends far beyond a simple “real estate action”. Another scoping issue is a problem with use of the term “sustainable” to refer to the continuation of military occupation of lands and “encroachment” to refer to non-military activities in proximity to military sites. This is problematic because it was the U.S. military that originally encroached on Hawaiian lands and transformed the landscape. And these environmental changes impaired the sustainability of many Hawaiian social, economic, and cultural practices. So, the use of “sustainable” and “encroachment” in the DEIS flips history on its head, where the foreign military installation is regarded as native, and the native people of the land are treated as intruders. The Army should avoid using these historically misleading terms to describe its project.</p>	
Kyle Kajihiro	Hawai‘i Peace and Justice	<p>Land Use The DEIS is deficient because it 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 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</p>	<p>Section 2.3.3 states that the land retention method would be determined through negotiations with the State, which would occur after the ROD is published. Environmental impacts from the Proposed Action (Army retention of State-owned land) are analyzed for lease and fee simple title as discussed in Section 2.3. Chapter 3 addresses impacts from 1) lease, and 2) fee simple title land retention methods.</p>

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		<p>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. Similarly, if the Army is considering seeking an Executive Order, it must analyze the impacts of this action. Executive Order lands, which constitute a majority of the military’s land holdings in Hawai’i, are part of the Hawaiian trust lands, and constitute a special category due to their historical origins as the national lands of the Hawaiian Kingdom. The DEIS must fully disclose the proposed methods of land retention and analyze their potential cultural and social impacts. The DEIS misleadingly lists the areas of Mākua outside of the lands leased from the State as “government controlled”. However, while portions of kuleana lands in Mākua were acquired by the Government through eminent domain and is claimed by the Government in-fee, the largest portion of Mākua was 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 distinguishes “Ceded Land” from land owned in fee by the Government.</p>	<p>Section 3.2.5 describes the loss of ‘āina and identifies the transfer of title to these lands as a significant impact. The Environmental Justice analysis in Sections 3.12.5 discusses the alienation of lands that would occur under the action alternatives and associated impacts.</p>
Kyle Kajihiro	Hawai’i Peace and Justice	<p>The DEIS fails to make available for public review of a number of documents pertaining to the Army’s land acquisition proposal as presented to the Secretary of Defense. On page 1-9, the DEIS states: USAG-HI ordered preliminary title reports and metes and bounds surveys for the State-owned lands; completed Environmental Condition of Property (ECOP) reports, an Analysis of Alternatives Study (AAS), economic analyses, and preliminary cost estimates; and initiated a Major Land Acquisition Waiver (MLAW) process with the Under Secretary of Defense for Acquisition and Sustainment that initiated the NEPA process, commenced public planning, and communicated with the State. The public should be able to review and critique the methods by which the Army arrived at its</p>	<p>Links to the Environmental Condition of Property (ECOP) reports and Integrated Natural Resources Management Plan have been added to the O’ahu ATR EIS website (<a href="https://home.army.mil/hawaii/OahuEIS">https://home.army.mil/hawaii/OahuEIS</a>) under the “Documents” tab.</p> <p>The O’ahu Range Complex Master Plan (2022) and O’ahu Analysis of Alternatives Study are not currently publicly available due to operational security requirements. Other non-publicly available documents can be obtained through the</p>



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		<p>assessment of the environmental condition and alternatives, its cost projections and economic impacts analysis, and the instruments under consideration for land retention. As I have indicated elsewhere, the method by which the Army proposes to retain the land makes a big difference in the social, cultural, and psychological impacts of the action. The Army must make the following documents pertaining to the land acquisition proposal available on its website for public review: Environmental Condition of Property (ECOP) reports Analysis of Alternatives Study (AAS) U.S. Army Hawaii (USARHAW). (2017). USARHAW Major Land Acquisition Proposal. U.S. Army Hawaii (USARHAW). (2017). MMR Analysis of Alternatives: No Action Alternative. U.S. Army Hawaii (USARHAW). (2018). USARHAW Major Land Acquisition Waiver. Memorandum issued by Assistant Secretary of Defense. June 4, 2018. The DEIS refers to the O’ahu Range Complex Master Plan (2022) and five plans that inform the Master Plan, none of which are available for public review. The Army must make these documents available for public review on its website: U.S. Army Hawaii (USARHAW). (2022). Range Complex Master Plan. Integrated Training Area Management (ITAM) work plans U.S. Army Garrison-Hawaii (USAG-HI). (2010). Integrated Natural Resources Management Plan (INRMP) 2010-2014, Island of O’ahu, Schofield Barracks Military Reservation, Schofield Barracks East Range, Kawaiiloa Training Area, Kahuku Training Area, Dillingham Military Reservation, Makua Military Reservation, Tripler Army Medical Center. July 2010. U.S. Army Garrison-Hawaii (USAG-HI). (2018). An Integrated Cultural Resources Management Plan (ICRMP) for the U.S. Army Garrison - Hawaii, O’ahu Island, Hawai’i. U.S. Army Garrison-Hawaii (USAG-HI). (2020). Integrated Pest Management Plan (IPMP), U.S. Army Garrison, Hawai’i, 2015–2020.</p>	<p>Freedom of Information Act process. The Freedom of Information Act (FOIA) Library and FOIA.</p>
<p>Kyle Kajihiro</p>	<p>Hawai’i Peace and Justice</p>	<p>Compliance with the leases The Army has said that it would comply with the leases. However, there is no analysis of the proactive measures the Army will take to restore the harm done to the land. By omitting this analysis, the Army effectively condemns these</p>	<p>Lease compliance actions for the current leases would be determined following expiration of the current leases and in accordance with the leases or otherwise negotiated with the State. Impacts from these lease compliance actions (including</p>

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		lands to ruination in order to avoid its obligation to restore the land.	removing infrastructure, signs, and weapons and shells, and reforestation) and cleanup and restoration actions are analyzed under the Land Not Retained and No Action Alternative headers in each resource area in Chapter 3. The effectiveness of mitigation measures identified in the EIS to address adverse impacts otherwise do not need to be included in the EIS. Mitigation measures would be tracked for efficacy in a Mitigation and Monitoring Plan to be developed following issuance of the ROD.
Kyle Kajihiro	Hawai’i Peace and Justice	State Land Use Regulations The O’ahu training lands in question fall 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 for Pōhakuloa: 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) The same land use conflicts would hold for the leased lands on O’ahu. The DEIS indicates that the Army proposes to change the land use designation or request a special exemption for its activities at these sites, but there is no description of the proposed land use revision actions or any analysis of their impacts.	Compliance with HAR Chapter 13-5, Conservation District, has been revised and is discussed in Sections 1.4.2 and 4.3.2. Sections 1.4.2, 3.2, and 4.3.2 have also been revised to state 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.
Kyle Kajihiro	Hawai’i Peace and Justice	Cultural Resources To date, investigations into the number and significance of cultural sites have been superficial. Kānaka ‘Ōiwi and the general public currently only have limited access to the O’ahu parcels, 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 fails to conduct a Kapa’akai analysis of the proposed actions, which must include, (1)	Section 3.5, the appended CIA (Appendix B), and the ALR (Appendix I) 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 Hawai'i Constitution to protect Native Hawaiian Traditional and Customary Native Hawaiian

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		<p>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 Pa`akai O Ka`aina v. Land Use Commission, 94 Haw. 31. 2000. 36)</p>	<p>Rights.</p> <p>Section 3.5.5.3 discusses the process by which cultural access agreements were agreed upon and safety protocols for cultural access at MMR.</p> <p>Section 2.5 of the Final EIS has been revised to state the No Action Alternative is identified as the preferred alternative for MMR (i.e., the State-owned land at MMR would not be retained). Under the No Action Alternative, as stated in Section 8.3.4 of the CIA in Appendix B, cultural access would no longer be restricted because the land leased to the Army would be returned to the State under this scenario. This is reiterated in the environmental consequences analysis in Section 3.4.5.3, in particular for MMR.</p> <p>Section 3.6.5 states that the Army retains responsibility for cleanup of closed ranges (i.e., State-owned lands not retained). Text has been added that this is pending an agreement with the State allowing the Army access for necessary inspection and management of any contaminated sites.</p>
Kyle Kajihiro	Hawai’i Peace and Justice	<p>Cultural Landscapes: The DEIS fails to provide a complete traditional cultural properties (TCP) analysis of the larger cultural landscape. The Cultural Impact Assessment (CIA) must consider the entire interconnected cultural landscape of O’ahu. Hawai’i 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 ‘Ōiwi. This study should include an in-depth cultural landscape study (CLS) and ethnographic survey (ES) and discuss the impact of the proposed action on this expanded cultural landscape. In the late</p>	<p>OEQC guidelines recommend a geographic extent beyond the boundaries of the project area for assessing impacts to cultural practices, which the DEIS accommodated (refer to Section 3.5.3). NEPA and HEPA do not require the ROI to extend outside the project area of the Proposed Action for historic and cultural resources (see Section 3.4.3 of the EIS). Further, a comprehensive TCP study is outside the scope of this EIS.</p>

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		<p>1990s and early 2000s, the Army commissioned the Final Traditional Cultural Places Study / Ethnographic Report for Mākua (Cultural Surveys Hawai’i 2000). In 2017, I requested this document through FOIA. After a seven-year ordeal of delays and misdirection, I finally received this document on July 31, 2024. This study is significant because it provides ethnographic support for the designation of Mākua and its connected landscapes as a TCP and its eligibility for listing on the National Register. The DEIS fails to cite this document or analyze the cultural importance of Mākua. One of the key concepts described by participants in the Mākua study is ka’anani’au, “the rolling beauty of time”, which refers to the system of land divisions/connections and spiritual demarcations on the island of O’ahu prior to the introduction of the ahupua’a system from Hawai’i and Maui. The ka’anani’au form a network of sites across O’ahu that link sites spiritually, culturally, and politically across distances. They can include visual landmarks or sites connected by stories, events, and people. Therefore the cultural landscape analysis must expand its spatial scope to incorporate the wider web of sites as indicated in the ka’anani’au approach. The “Cultural Resource Evaluations of Stryker Transformation Areas in Hawai’i” (Monahan 2009), which was produced as part of a settlement agreement between the Army and the Office of Hawaiian Affairs, recommended that a number of areas affected by the Stryker Brigade expansion be studied and evaluated for TCP status and NR listing. The Monahan report found that a number of archaeological studies of Kahuku were incomplete. Despite scoping comments referencing this report, the DEIS is deficient because it fails to cite this document and analyze the cultural significance of these affected landscapes. The Papakū Makawalu methodology, developed by the Edith Kanaka’ole Foundation, would be appropriate to employ in the assessment of the cultural meanings and significance of the affected area.</p>	
Kyle Kajihiro	Hawai’i Peace and Justice	Wildfires and Threatened and Endangered Species The very existence of the O’ahu Natural Resources Program (ONRP) is the result of legal and political challenges from the community over	A general discussion of wildfires on the State-owned land is included in Section 3.14. Section 3.14 also includes a discussion of firefighting

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		<p>military impacts on endangered species and their ecosystems. Wildfires in Mākua were one of the key threats that forced the Army to create the ONRP. The DEIS must provide a complete history of wildfire events on Army lands on O’ahu, including the dates, causes, extent of damage, responses, and results. This record will give the public and decision makers data for evaluating the cumulative risk of military training at these sites. Have there been any audits of the sufficiency of existing firefighting capabilities to combat military wildfires? Please provide any such assessment of the firefighting capabilities. We can expect climate-change-induced wildfires to increase in frequency and intensity. What is the readiness of the Army’s wildfire capabilities? How much is the wildfire risk expected to change due to climate change?</p>	<p>capabilities and readiness.</p> <p>Impacts as a result of climate change are addressed in Section 3.7. Additional text has been added to Section 3.14 regarding increased wildfire risk as a result of climate change. Section 3.14 was updated with a list of historical fires that have occurred on the State-owned land at KTA, Poamoho, and MMR. Additional information on wildfire potential and wildfire fighting capabilities was added to Section 3.14.</p>
<p>Kyle Kajihiro</p>	<p>Hawai’i Peace and Justice</p>	<p>Socioeconomics / Environmental Justice Analysis: The greatest environmental justice impacts will be borne by Kānaka ‘Ōiwi who have the most profound ancestral and political connection to the lands in question. As I mentioned at recent public meetings on the DEIS, the DEIS should include an ethnographic or sociological analysis of the testimonies delivered at the public meetings as evidence of historical, multi-generational, cultural trauma. In other words, it is not enough for the DEIS to incorporate only the text of these testimonies. The DEIS must incorporate an analysis of the phenomenon of cultural and political trauma on display at these public meetings in the emotional expression and social dynamics of the oral testimonies. This analysis will inform the environmental justice analysis, the cultural impacts analysis, and the cumulative analysis. The DEIS touts the Army policy of allowing limited forms of cultural access to the affected sites. However, in their expressions of grief about the loss of cultural connection to ‘āina, numerous testifiers described how limited opportunities for cultural access, and the highly restrictive rules imposed on cultural access cannot mitigate the harm of being alienated from their ancestral lands. The DEIS does not analyze the opportunity costs of Army retention of these lands, nor does it analyze the benefits of restoring and returning these lands to the State for cultural, educational, or other</p>	<p>Benefits occurring as a result of returning lands to the State are identified in the analysis in Section 3.12. What the State specifically chooses to do with the returned lands is speculative and not part of this analysis; therefore, a quantitative and qualitative case study analyzing the beneficial impacts of cultural restoration is outside the scope of the EIS. The EIS acknowledges significant adverse impacts on communities with environmental justice concerns from land retention, primarily from loss of ‘āina, and is factoring that into decision-making on the Proposed Action to be documented in the ROD. EIS Section 3.12.5 has been revised to further assess significant impacts on Native Hawaiians. The ROI for environmental justice is described in Section 3.12.3.</p>

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		<p>beneficial uses. What are the possible cultural and educational benefits of restoring these lands on O’ahu? The DEIS should include a case study of the quantitative and qualitative beneficial impacts of the restoration of Kaho’olawe as a cultural reserve. By analogy, the DEIS can infer the possible beneficial impacts of restoring and returning the O’ahu training sites and their conversion into spaces of environmental and cultural revitalization.</p>	
<p>Kyle Kajihiro</p>	<p>Hawai’i Peace and Justice</p>	<p>Appraisal of Real Estate Market Value Cannot Account for the Cultural Value of ‘Āina The leases contain an onerous clause that allows the Army to escape its responsibilities for cleaning up the land if the cost of the cleanup exceeds the appraised value of the land. By using real estate metrics, these lands would be appraised at ridiculously low prices. This would allow the Army to avoid its obligations to restore damaged environments. When the Board of Land and Natural Resources recently considered conducting an appraisal of the leased lands, the public has a right to know what role the Army had in initiating this process. Did the Army request that the State begin the process of appraising the lands in question? It is crucial to remember that these places are regarded as ‘āina, which includes history, genealogy, religion, and a living relationship with the people; ‘āina is much more than simply real estate. So a market appraisal for the land is an intrinsically flawed method of valuation. This ‘āina has cultural and social value that cannot be monetized and must be evaluated in culturally appropriate ways, such as the Papakū Makawalu methodology.</p>	<p>Sections 2.1 and 3.5 were revised to state that the Army would follow applicable regulations to conduct cleanup and restoration activities for any potential MEC on any State-owned lands not retained at the end of the current lease.</p> <p>Section 2.1 has been revised to indicate that the Army would coordinate cleanup and restoration activities with the State of Hawai’i throughout the CERCLA process.</p>
<p>Kyle Kajihiro</p>	<p>Hawai’i Peace and Justice</p>	<p>Toxic and Hazardous Substances What is the extent of UXO and toxic hazards at these various sites? Please provide maps and documentation of the UXO and other known contamination hazards at the O’ahu sites.</p>	<p>Text added to Section 3.6.5.3 "As noted in Section 2.2.4.2, as a result of historical live-fire training activities, MMR east of Farrington Highway is considered a duded impact area (USACE PHO &amp; USAG-HI, 2017b).</p> <p>Sections 3.6.5.1 and 3.6.5.2 note that no UXO or toxic hazards were identified at KTA or Poamoho.</p> <p>Sections 3.6.5.1, 3.6.5.2, and 3.6.5.3 describe the</p>

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			current status of hazardous substances and hazardous wastes and their locations at KTA, Poamoho, and MMR, respectively.
Kyle Kajihiro	Hawai‘i Peace and Justice	Cumulative Impacts What are the climate impacts of the military activities at O‘ahu training areas? 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 international climate reports, the climate change impact of the military activities on O‘ahu is 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.	The Proposed Action is a real estate transaction (i.e., administrative action), and there would be no additional fuel consumed or miles driven. Therefore, no new air emissions or changes in emissions would occur, and no further analysis beyond the qualitative air quality and climate change analysis presented in Section 3.7 of the EIS is necessary. Section 3.7.4 explains why a quantitative, full life-cycle analysis of greenhouse gases (GHGs) has not been performed, and this text has been further clarified in the Final EIS. Section 3.7.5 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 has been added to Section 4.2 (Incomplete Information/Unresolved Issues) to discuss the lack of new emissions that would trigger a quantitative analysis of GHG emissions and associated social costs of carbon as well as the reasons for proceeding without such an analysis.
Kyle Kajihiro	Hawai‘i Peace and Justice	Public Participation The NEPA process is flawed because the Army has consistently withheld important information, either intentionally or through negligence. During the scoping process and in the Pōhakuola DEIS process, public commenters asked that key cultural resources studies and land use documents be made available to the public. But these have not been made available or referenced in the DEIS. Historically, the military has suppressed cultural resources studies, such as the Kelly and Quintal oral history report (1977), the Maly oral history report (1998), and the Monahan supplemental archaeology report (2009). This pattern of	Relevant reports have been added to the Supporting Documents section of the EIS project website; some of the reports mentioned are not relevant to this EIS as the study areas do not include the subject State-owned land training areas. Please refer to the O‘ahu ATR EIS website ( <a href="https://home.army.mil/hawaii/OahuEIS">https://home.army.mil/hawaii/OahuEIS</a> ) under the “Documents” tab.

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		<p>suppressing information suggests that the Army wishes to influence more favorable findings in the NEPA process by withholding or suppressing the release of findings which do not favor the proposed actions.</p>	
<p>Kyle Kajihiro</p>		<p>Aloha Kākou I hope this email finds you well. Pursuant to the Freedom of Information Act (FOIA), I am requesting any and all communications and correspondence pertaining to the Army Training Land Retention at the Pōhakuloa Training Area Second Draft Environmental Impact Statement between the dates April 19, 2024 and June 19, 2024, between the U.S. Army and the State of Hawai’i Department of Land and Natural Resources (DLNR). This request includes, but is not limited to: A. communications and correspondence between the U.S. Army Garrison Hawai’i and DLNR; B. communications and correspondence between the U.S. Army Pacific and DLNR; and C. communications and correspondence between consultants working on the NEPA/HEPA process and DLNR I am willing to pay fees up to \$100. Please consult with me first if the fees are likely to exceed that amount. Thank you very much.            Sincerely, Kyle Kajihiro</p>	<p>The Freedom of Information Act (FOIA) Library and FOIA Request processes 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>Aloha kakou. Kyle Kajihiro from Mo'ili'li. Just want to make -- underscore a point that these leases are nonrenewable, and it's not even state property. They're the trustee for these lands, which is the highest level of care that is required. As I was driving out here, I saw the silhouettes of this. You have to consider all of these effects on various communities that are unjust, including race, ethnicity, gender, and colonial status. The DEIS is also deficient. The DEIS is also deficient in the cumulative impacts analysis. This has to look at effects, not only in the future, but also the present and the past. It has to look at the effects. It's not just the yellow spots on the map. It's the effects of the activities and how they relate to other spaces. You've heard tonight about how people are talking about how the methods of killing that are perfected in Hawaii get deployed against other peoples around the world. That has to be incorporated into your analysis, and you have to consider the synergistic effects of all of these things combined. So what I think</p>	<p>Land retention methods evaluated in the EIS include the Army obtaining new leases. In addition, each resource area in Chapter 3 of the EIS includes a cumulative impact analysis that addresses past, present, and future actions.</p> <p>The No Action Alternative analyzed in the EIS is no retention of state-owned lands after expiration of the leases. Lease compliance actions and cleanup and restoration activities which would occur upon expiration of the leases are discussed in Section 4.2.4. Reparations are outside of the scope of this EIS.</p>



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		<p>you're hearing tonight in the eha that's being expressed, in the rage that's being expressed, these are expressions. These are evidence of the cumulative impacts. The UN Declaration on the Rights of Indigenous Peoples has the standard of free, prior, and informed consent. Your EIS must include that analysis. Probably the most definitive expression of a refusal of free, prior, and informed consent is the 1897 ku'e petitions. And finally, in light of all of this, the missing alternative that needs to be included is that you clean up and restore these lands and pay reparations for the harm that's been done for over 100 and however many years. Mahalo.</p>	
<p>Kyle Kajihiro</p>		<p>Aloha kakou, Wahiawa. My name is Kyle Kajihiro, from Moili'ili. Tonight I want to talk about the process -- flaws with the process. And in order to meaningfully participate in this EIS process, we need access to information, we need transparency. And there's some critical information that we haven't been able to get. So in 2017, I submitted a FOIA request for the Final Traditional Cultural Places Study Ethnographic Report for Makua. I think this report is relevant to assessing whether Makua is eligible as a traditional cultural properties site. It's been over seven years. I haven't gotten the report, Colonel. I don't know where you folks file this stuff. But I -- I'm beginning to think that it's sort of the pattern that happens. In 1977, Marion Kelly did the Cultural History Report for Makua Valley. And because the findings were critical of the Army's use of the valley, that report was suppressed for over 30 years. In 2006, during the Stryker brigade expansion, OHA sued the Army for violating Section 106 of the National Historic Preservation Act, for failing to conduct adequate archaeological surveys of the sites. So as a settlement, they agreed to allow a limited survey of sites in Lihue, Schofield, Kahuku, and Pohakuloa. Chris Monahan led that study. It was completed in 2009. But the report was never released. The report recommended that these many sites were eligible for National -- National Register of Historic Places, and possibly it should be evaluated for inclusion as traditional cultural properties. So what happened to that report? I submitted it, along with my comments on the scoping process and the cultural impact</p>	<p>Referenced documents are identified in Chapter 5 and links for publicly-available documents have been added to the O’ahu ATRR EIS website (<a href="https://home.army.mil/hawaii/OahuEIS/project-home">https://home.army.mil/hawaii/OahuEIS/project-home</a>) under the “Documents” tab.</p> <p>Responses to FOIA requests are outside the scope of this EIS.</p>

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		<p>assessment. But I don't see it cited in the report, and I don't see the documents available to the public. And so there are other documents cited in the report that I would like to be made available. You cite the Army Range Complex Master Plan 2022. Please make that available on the website. You also cite the analysis of alternative study, but there's no citation listed in the bibliography. And I would like -- I think that that's very relevant, for us to understand how you're looking at these sites. There is a moratorium on major land acquisitions for the DOD. And so you had to request a waiver, which was submitted in 2017. It's listed in the citations, but I've requested it through FOIA, and I have not gotten it, over several years, now. I requested it under "Pohakuloa EIS." And also, the major land acquisition waiver, which was granted in 2018. But again, I have not received that document. So please post those on the website, because this is all relevant and necessary for us to understand what your plans are. And so the fact that they haven't been released and made available makes me wonder whether you have some cards up your sleeve that you're hiding from us, because if we understood what was really going on, we would be able to raise our voices to it. So please make those information available. Thank you.</p>	
<p>Kyle Kajihiro</p>		<p>Aloha kakou. I'm Kyle Kajihiro from moililili. I'm an Assistant Professor at Ethnic Studies at UH and also with Hawaii PC Justice . . . Shortly after Pearl Harbor, the U.S. Military directed the ethnic cleansing of about 120,000 persons of Japanese ancestry from the West Coast of North America, put them in concentration companies, about a several dozen. They arrested about 2,000 persons of Japanese ancestry here in Hawaii. . . . I recently went to a Tulelake pilgrimage. Tulelake was the largest incarceration site, about 18,000 persons of Japanese ancestry were imprisoned there. It -- at that time, it was the largest city in Northern California. And at this pilgrimage the descendants, the survivors and descendants, were sharing their stories. They were trying to heal from the intergenerational trauma of that experience of being ripped away from their homes, from their livelihoods, being treated as prisoners,</p>	<p>Impacts on ‘āina are discussed in Section 3.12 (Environmental Justice). An ethnographic analysis was included in the Cultural Impact Assessment, which is in Appendix B of the EIS. The lease and fee simple title land retention methods were analyzed for each resource area in Chapter 3; the method to be used would be determined during land retention negotiations with the State.</p>

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		<p>and then just being set free, set loose. . . . . Shortly after Pearl Harbor happened, the U.S. Military imposed martial law in Hawaii and seized hundreds of thousands of acres of land, up to 645,000 acres at one point. So this is land that's held hostage. This is aina that's held hostage. And this is a deficiency in the -- in the <u>EIS that it is treating it as a real estate action when really you should be analyzing the impacts on aina, which is a living relationship.</u> . . . . . When you put fences and barbed wire and you separate people from their ancestral lands, you've created orphans from those lands. You've created a rift that needs time to heal. . . . . Today, the military controls about 225,000 acres of land. About 40,000 acres are leased for a dollar. It's not just the Army but Navy and Air Force as well. And what's perverse and cruel is that by leaving bombs and toxins in these lands you have boobytrapped the body of the aina, so that people cannot even embrace their kupuna without being harmed. . . . . So the EIS is deficient also because it does not take into account all the testimony that you're hearing here today. This is evidence, and you really <u>need to incorporate an ethnographic analysis of the kind of generational harm</u> that is being expressed to you tonight. That is part of the testimony that has to be incorporated into the EIS. . . . . A point I want to make is that the lease is not renewable. It ends in 2029, and -- and the EIS has failed to analyze the -- the instruments by which you propose to continue retaining these lands. So you haven't analyzed the executive order or condemnation which is basically both words for theft of land. What are the impacts of that? You have not incorporated that. So the Japanese Americans got a token apology and \$20,000 as redress for their experiences during the war. The Kanaka Maoli got a 1993 apology from the U.S. Government, but land was not returned, so it is time for you to return the lands that were taken wrongfully to make good on that apology. Thank you.</p>	
Kamuela Kala'i		<p>Aloha 'Āina Kūpuna! Love the land of our ancestors! Hawai'i deserves the highest level of respect and protection from the continued degradation, destruction, and occupation of our precious 'āina by the United States military. Our ancestral lands have been</p>	Please see General Response.

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		<p>bombed, poisoned, and obliterated for decades by the U.S. military. This has resulted in the horrific destruction and degradation of our land that feeds us, our oceans that we swim and surf in, our air that we breathe, and our freshwater that gives us life! Hawai'i deserves better! We, the descendants of this land deserve better! Our children deserve better! The U.S. military needs to clean up its mess, return our 'āina to our people and leave Hawai'i. This is our ancestral homeland. This is the homeland of thousands of generations of our kūpuna. This will be the homeland for our children for generations to come. Hawai'i nei is our mother. 'Āina is what feeds us. It is unacceptable that the U.S. military has been allowed to poison our fresh water, pollute our ocean, and destroy our 'āina for over 100 years. Do what is just and pono! Clean up your bombs and your bullets, your poison and your pollution. Restore the life of our land. Take all of your weapons of mass destruction out of Hawai'i so we can ensure our 'āina will be healthy and fruitful for generations to come. Aloha 'Āina! Kamuela Kala'i Makaua, Ko'olaupoko, O'ahu</p>	
Camille Kalama		<p>Aloha mai kakou. My name is Camille Kalama. I live in Waiawa, in Pu'u'loa. And I'm here today not because I think that my two minutes of testimony, in my forties, as the first chance to speak on the retention of these lands, on the military's use of thousands of acres of our national lands, is going to make a huge difference to you. I'm here because we have no choice. It's our kuleana, as descendants of people who signed those kue petitions to oppose US annexation. The great myth is that they failed. The truth is that they succeeded. There is no treaty. That was a success. They beat it. What we have is a resolution. We also have a resolution that is your law, that says that we have unrelinquished claims to those lands, to all of these lands, these 6,000 acres and some, that you're proposing to continue using. We have unrelinquished claims to those lands. That is a property right. That's a property interest. And property does not even begin to convey what that means to our people. But we have an absolute right to have a say over those lands. And these two minutes to speak this, letters that we can</p>	<p>Each resource area in Chapter 3 addresses cumulative impacts of the Proposed Action when combined with impacts from other reasonably foreseeable actions.</p> <p>The Proposed Action is retention of State-owned lands; impacts unrelated to the Proposed Action are not included in the EIS. Assessing the total cumulative impact of the military in Hawai'i is beyond the scope of this EIS.</p> <p>Sections ES.12, 2.1, and 3.6 have been revised to include a summary that the Army would follow the CERCLA process in accordance with applicable DoD and Army regulations and processes. The CERCLA process includes phases such as preliminary assessment/site inspection, remedial</p>

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		<p>write in, that is not a say. Consultation, listening, that's not decision-making and power over what happens to these lands that are part of our future and our keiki's future. But we're here because we have to be here. And I will say that these studies that you produced, despite over a thousand pages, they tell us almost nothing. And I say that with all due respect. They don't tell us where we're at now. <u>What have you done in the almost 65 years that you've been using these lands? What is the condition that they're in? What needs to be done to bring them back to where you were when you started? This is not a true assessment of the impacts. If we're starting from today, and saying, "We're just going to keep using them, and so therefore there's little to no impact," how is that a study? How is that a real impact analysis? And how does that inform any decision-making going forward? It doesn't. It tells us that all negotiations over cleanups are going to happen after this is done? What is this going to tell us about them? What is this going to tell the decision-makers about them? What does this tell the Board of Land and Natural Resources, who is now entrusted with these national lands of our people? What does it tell them? It does say in the summary that the use is consistent with state and federal laws. Well, how is it, then, that it says right in your documents that it's not consistent with the state land use laws? That's the laws we're living under right now. Those are the laws in power. It says explicitly they're not consistent. They're considered non-conforming uses. Why? Because the people of Hawaii have said that these are conservation lands, these are agricultural lands. In other words, these are lands that are important for food, for cultural use, for preservation, for natural environment, for really the future of our planet and our people. And so, absolutely not. Military use is not an allowed use. It's not a compatible use, and it's not compatible with the national lands for native Hawaiian people, the values that we hold, and the legacy we want to see for our keiki. I don't want to see my 16-year-old, who lives right now across from that noise that you just heard on the speaker. Part of the reason I had trouble making my testimony today -- because I was trying to</u></p>	<p>investigation/feasibility study, remedial design/remedial action, and post-construction completion phases.</p>

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		<p>work, listening to that. It was so loud, I thought someone was knocking on the door. I don't want him to be in his 50s, in his 80s, when he gets his two minutes to speak about these lands that are part of his heritage. Bottom line is all the military uses, we can't consider them piecemeal like this. You have Pohakuloa Training Area considered under a separate EIS. You have Oahu under a separate EIS. You have I'm sure Barking Sands is going to be under its own EIS process. <u>Where is the study that assesses all the military impacts in Hawaii?</u> Where is that? What do we know about that, and when are we going to have that? That's the problem. The bottom line is we want our lands back, and we want them now. Mahalo.</p>	
Chanel Kaleikini		<p>Aloha kakou, aloha kakou, how's it? I'm Chanel Kaleikini. I am from Waianae Valley. And on behalf of the Hawaiian people and our deep-rooted connection to Makua Valley, every day for generations, Makua has been more than just land. It is the heart of our culture and the respiratory of our history, the essence of our identity. . . . The military's occupation of Makua Valley has inflicted irreparable harm upon this sacred land. We have witnessed the desecration of our sacred sites, the pollution of our natural resources, and the disruption of our traditional practices. These abusive actions not only degrade the landscape, but also a road, our spiritual and cultural foundations on which our community thrives on. . . . The military's assertion of control over Makua Valley in exchange for land value is an affront to our heritage and our right to indigenous people. We, the people, refuse to accept the proposed land swap for the desecration of our ancestral lands. Allow the Hawaiian people to heal ourselves by healing our Makua. . . . We call upon you to recognize the sovereignty and respect our inherent right to stewardship of our land. We demand the return to its rightful owner heirs and the people, the Hawaiian people. . . . If the Hawaiian people do not have Makua it is robbing us an opportunity to live and breathe aloha. he ali'i 'āina, he kauwa ke Kanaka. Mahalo. Mahalo nui.</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
Nathan Kamahele		<p>My name is Nathan Kamahele. I am Kanaka Maoli, and I am a direct descendant of Kamehameha Nui. I came to Waianae and Kahuku to observe. And now I'm here at Leilehua. And I'm so proud of my lahui for coming out, standing up, making time, making sacrifices. I know you guys are all out here making sacrifices. E kalamai. I had to -- I came late. I had to go to a CRB meeting in Kailua earlier this evening, which is another issue that we have, because our military, they brought the coconut rhinoceros beetle here. And it has the potential to wipe out all vegetation in Hawaii, starting with coconut palms, banana, 'ulu tea leaf, and our kalo. And once they wipe that out, they will continue to wipe out vegetation till there's nothing left. We must wipe that out. We must take out all invasives in Hawaii. Period. If they do not have aloha, they have to go. Okay? I stand here humbly and respectfully here, as -- as a dad. I have two keiki, two Kanaka Maoli keiki. And as a dad, it is my responsibility to make sure that I provide for them and protect them to the death. This is our responsibility. Yes? And my question to you guys, do you guys have kids? Human to human, do you guys have kids? So we teach our kids right and wrong. Right? We teach them at home, right and wrong. And then we go out to do our jobs, which is wrong. Right? So let's talk about this. Right? Let's break it all down. Do you believe in God? Yes. The answer is "yes." Do you believe in love? The answer is "yes." And if you believe in those two, you must believe in truth. Because if you do not believe in truth, you're lying about the first two. The truth of the matter is the US military and the US government are the terrorists here in Hawaii. They have been. They have always been. We need to hold these terrorists accountable. Not just the US military. Not just the fake state. Dole Pineapple. That's another one. HICO. These are all establishments, established -- exactly. Alexander &amp; Baldwin. Captain Cook. These are all establishments, established by terrorists, and still in business today. We must hold them all accountable. To my lahui, I love you. I love you. Yes, my last name is "Kamahele." I believe it is my kuleana to make sure that these lands are returned to our people. Our kupuna. Your kupuna are</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>very proud of you.· You have been awakened.· You have been activated.· Not all of us are up yet.· There's many of us still sleeping.· Yeah?· And I have to remind all of us, with all the mana from our kupuna, this thing that we are being taught: Thank you for your service.· No, we don't thank the terrorists for what they're doing to us, what they've done to our ancestors. Another one is this thing we call "kapu aloha."· Right?· I want to remind you, our kupuna are reminding you that kapu aloha is not lay down and let them take everything, let them rape your kids, let them rape your women, let them abuse you, let them fuck up your resources.· Kapu aloha does not mean lay down and let them do that. "Kapu aloha" means you defend aloha to the death, strategically. So let's get together.· Let's hui this thing, so we can flip this whole thing.· Yeah?· Our keiki and our mo'opuna. We'll see independence. 'Eo.</p>	
Kaleo Kamai		<p>Welina me ke aloha mai kākou, 'o Kaleo Kamai ko'u inoa, o Kaiaulu ku'u makani, 'o Nene'u ku'u kahakai, 'o Kanewai ku'u kahawai, 'o Ka'ala ku'u mauna a o Hawai'i ku'u home. I'm ·Kalao Kamai.· I'm from Waianae.· Ka'ala is my mauna.· Kaiaulu is my wind, Kanewai is my stream and Nene'u is my beach and Hawaii is my home. And I'm tired of my home, sick and tired of my home being desecrated at the hands of the military. Tired of it constantly being bombed, my water being poisoned.· · · · · You folks paid \$1 for land that my people cannot even access.· I'm tired of the military gaining privileges that my people -- that belong to the Hawaiian people.· I'm tired of you folks constantly degrading our aina simply because Hawaii serves as a logistics link and allows for rapid troop deployment.· Simply because Hawaii provides a range of training environments that cannot be replicated other states, simply because Hawaii hosts the headquarters for the U.S. Pacific Army, Pacific Fleet, Marine Corps, Air Force, Special Operations. Why are you guys here in the first place?· · · · · We've been telling you guys for generations go home, clean up after yourselves.· So I'm just going to reiterate myself.· I'm going to stand my position and I'll do it today, I'll do it again tomorrow, and however long it takes until you folks get the message and go.· · · · · I oppose the renewing of the</p>	Please see General Response.



Commenter	Submitted By	Comment	Response
		<p>lease for the military and especially I oppose your folks' present.· Mahalo.</p>	
Chelsey Kamana		<p>I am writing to advocate for the return of three parcels of land on O‘ahu that were historically seized by the military. The restoration of these lands is not only a matter of justice for the Native Hawaiian people but also crucial for addressing the extensive environmental damage caused by the military's occupation.</p> <p>The land in question holds profound historical, cultural, and spiritual significance for the Native Hawaiian community. It is more than just physical space—it is a living part of their heritage, encompassing sacred sites, traditional practices, and ancestral connections. The military's occupation and use of these lands have resulted in significant disruptions to these cultural practices and the displacement of communities.</p> <p>Moreover, the environmental impact of the military's activities on these lands has been severe. The military's presence has led to extensive damage to the natural landscape, including contamination of soil and water sources, destruction of native habitats, and the degradation of vital ecosystems. These environmental consequences have put local natural resources at risk and have had lasting effects on the biodiversity and ecological health of the region.</p> <p>Restoring these lands would not only rectify a historical injustice but also provide an opportunity to address and remedy the environmental damage inflicted. It would allow for the implementation of sustainable land management practices and environmental restoration efforts, contributing to the healing of both the land and the community.</p> <p>In returning these lands, the military would demonstrate a commitment to environmental stewardship, social justice, and respect for indigenous rights. Collaborating with Native Hawaiian leaders and environmental experts could facilitate the restoration of these lands, supporting the revitalization of cultural practices, the preservation of sacred sites, and the recovery of damaged ecosystems.</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>In conclusion, the return of these three pieces of land to O'ahu and to stop the military from renewing their lease is essential for rectifying historical wrongs, addressing environmental damage, and supporting the cultural and spiritual well-being of the Native Hawaiian community. It represents an opportunity for meaningful reconciliation and a commitment to responsible stewardship of both cultural and natural resources.</p>	
Emily Kandagawa		<p>So my name is Emily Kandagawa. I'm here as a kia'i to malama Makua and I wrote myself down so I can be on time, I hope. So, for the record, I am here to testify in total opposition to any renewal of U.S. Army leases. The common refrain in this effort to irresponsibly secure lease renewals is that you folks want to be better neighbors. . . . . If the United States were serious about that, you'd be looking back to 1849 and those precious few years that you bothered to honor our own treaties -- your own treaties with the Hawaiian Kingdom. . . . . We're all here because we love something bone deep. So my question is what do you love? What do you worship that would require you to commit genocide and rationalize destruction of life itself on every continent for hundreds of years? What is your reward for abandoning your reason and your humanity? . . . . . We know that this is for show for the U.S. Military for the fake state like every other public comment opportunity for every lease, for every proposed project. So I ask where is your respect for the people? Where is your respect for Hawaiians? . . . . . Beyond rhetoric, beyond pleasantries and checking boxes, the United States of America is having an identity crisis as the influence of your brutal empire dwindles. America is spiraling trying to manage appearances because your national narrative of exceptionalism is struggling to match up with our lived reality of the hewa on the ground from Palestine to Congo to Puerto Rico to Hawaii. You folks are dealing with a community who knows who we are, who knows Hawaiian history, who knows world history, knows American history better than most of you. And we were all tested under the malu of Maunakea and we have been granted in ceremony. . . . . The people do not consent to suffer these</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>indignities for another 65 years of unmitigated poisoning and desecration, let alone another 131 years of illegal U.S. occupation.· You will meet a level of resistance that all your readiness exercises could never prepare you for.· Because the U.S. Empire doesn't want you to give in to Aloha, a resistance movement that actually invites you to reconnect with your humanity. · · · · It may be dangerous, but it's fun to take your humanity back from the empire you were coerced into serving.· The empire that threatens to withhold medical care, housing, food and shelter from you if you disobey.· So please use this opportunity to become the conscientious objectors that we know you can be, refuse to be complicit. · · · · Help lead these fascists that you serve down the dignified path of the occupation, cleanup, and ultimately a treaty of peace between our two nations.· Mahalo.</p>	
Emily Kandagawa		<p>I am entirely OPPOSED to any lease renewals for the U.S Army in the Hawaiian Islands. The negative impacts of military presence are well documented, and none of the recommendations or paths forward presented by the military address the core issues of this prolonged illegal occupation, nor provide remediation for the harm already done from these leases of Crown Lands. The U.S. Army has the legal and moral responsibility to provide funding and specialized training for the clean up and rematriation process of these lands, for the benefit of all Hawaiians and future generations in these Islands.</p>	Please see General Response.
Leimana Kane		<p>I oppose. I oppose. I oppose. Our 'āina belongs to our people. Not the occupiers who are desecrating our space. Return what is rightfully ours so that we can actually show you how to aloha our 'āina.</p>	Please see General Response.
Erin Kaneaiakala		<p>The land that the Military feels Entitled to at a small to "no" Fee will make a larger impact to Oahu than your eis entails. More lies imparted by the US Army Garrison. Small impacts to no impacts is not possible on all of the leased land or occupied land by the use of all of these lands By the Dept. of Defense. Major impacts will be made by the Building of all housing, shopping centers, hotels and recreational for military and global U.S.A. The impacts are global</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		you have now reduced your military help to Foreign Nations in the form of Vietnam Phi L. Dang and Nisit. A. Gainey. Pathetic.	
Cris Kani'aupi'o		Strongly Oppose ; please consider cultural sensitivity	Please see General Response.
Jeriann Kaniaupio-Crozier		I strongly oppose the renewal of any leases for the military's use of any lands in Hawaii.	Please see General Response.
Kaleialoha Kaniaupio-Crozier		I strongly oppose the ATR here in Oahu! I strongly oppose the continue land use in Makua and kawaihoa by the U.S. military. The environmental damage is horrific already! Our communities' health and wellbeing has been deteriorated and detrimentally affected by their land possession and use of these lands for training. In addition, the army and other branches of the U.S. military have set a precedent of deceit and withholding of important information in relation to their harmful environmental impact, and have not been responsible with follow-up action, reparations etc. even when court mandated. They are a dangerous entity to continue to be a part of our precious island ecosystem. They need to go!	Please see General Response.
Melissa Ka'onohi-Camit		Aloha kakou. My name is Melissa Ka'onohi-Camit. I live here and reside here in the beautiful site over here in Kahuku. I'm a mother, a teacher, a community member, and I also standing here before you representing Lahui Foundation, which is -- I am one of the five directors formed here, right here, in Kahuku. I am speaking for our community, our lahui, our kupuna, my children, my grandchildren, and my great-grandchildren when I say a'ole to extending military leases on Hawaiian crown lands. The U.S. military has abused and contaminated our lands, poisoned our people for far too long for the price of \$1. \$1 to bring in your soldiers, trample on our native forests, bring in invasive, and destroy -- bring in invasives, and destroy our precious soil. \$1 to displace Hawaiians and local families. This is not a landlord/tenant dispute. This is theft and abuse. And today you're in Kahuku. Here in Kahuku, we do not idly sit silently observing this great hewa. This is not a real estate transaction that was done just a generation ago between two parties that did not have the best intentions for the people of these lands. I have personally sat in meetings with the military representatives as they told me that they wanted to be good	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>stewards of this land -- I am almost finished -- but instead, the U.S. military continues to leave their opala, abuse our aina, and show no-action to move in a positive direction of actually doing what is right by the land and the people of this place. Our aina needs time to heal. These leases began in bad faith without the consent of the state was supposed to represent. This is a decision that is greater than one single person to have the final determination of. This is a huge opportunity for the military to do what is the right thing and begin reparations to the rightful heirs of this land. Like our brothers and sisters from Waianae that came before you last night, we stand firm in our conviction to say a'ole to the extent -- extension to military leases. Mahalo.</p>	
Kawaiola Kapuni		<p>Ano'ai ke aloha kākou, Kawaiolaakeali'ikili Kapuni ko'u inoa, no nā hono o Pi'ilani mai au, mai ka ua Pe'epōhaku me ka makani Moa'e, a me ka makani Ka'ilialoha. My name is Kawaiolaakeali'ikili Kapuni. I am from the Bays of Pi'ilani and the rains and winds of eastern Kaupo and Kipahulu, both of which form the wahi pana and wau akua of Haleakala, a mauna that just one month ago faced a very similar threat to Makua Valley, that being the presence of the military, who, from its outset, have profited from the rape, prostitution, and ultimate desecration of 'aina, wahine, mahu, and the collective memory loss of Kanaka 'Oiwi and our indigenous relatives. This evening I stand with this lahui to reject any proposal that attempts to renew the lease of these violences, of your illegal, belligerent activity in Makua, and for that matter, every single one of our kingdom lands. Mahalo. Now, for nearly a year, I've been the student archivist for the Marion Kelly collection, an anthropologist whose work, that you refuse to put on the public record, in my hands right now, because it's summary and conclusions from all over 50 years ago, clearly stated that the Army must clean up and vacate our sacred Makua Valley, because within that time, you proved yourself to be incapable and apparently incoherent to the principle of consent. That is, when we say, "No," it means "no." Not ask again, try another mauna, or altogether strip our bodies from violence and autonomy and proceed anyway. Inarguably, "No"</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>means "no." Let me be duly clear that this 'aina, our bodies, our mo'olelo, are not yours to make a decision over.· You are occupiers of the Kingdom of Hawaii, a fraudulent institution that systematically benefits from our land and waters, that not only are not yours, but that you know nothing about and wish to know nothing about. While you benefit from military housing on our lands, think about the countless waves of our people that have gone houseless and have been forced to move away in search of stability that should be inherent on our 'aina. Ko kākou one hānau. Listen to me. When we have been saying, "Pack up your weapons, your war machine, your ignorant military soldiers that for decades have had the audacity to ask our 'aina the following questions:· "Can we, the imperial US Navy, rearrange the gut of your 'aina and replace it with famine just one more time?· Can we exploit and extract your 'aina, leaving it desolate of blood?"· Why? Colonizer, tell me, what of your presence speaks at all to the protection of our 'aina, when it solely appears as desecration?· What of your science speaks to an unbreakable pilina that allows you to speak, listen, and act in the language of 'aina, of hoailona? Colonizer, tell me, what of your military and national defense possesses the backbone to truly protect millions over a millennia, sustainably and abundantly, just like the kupuna of Kanaka 'Oiwi and Moananuiakea have done? What of your EIS speaks to the accurate information, when it does not include the culture of intergenerational slices and scars that you have left on our bodies? Colonizer, tell me, when have you ever not had blood on your hands?· So wake up and start listening with your body, not just your ears, that we say no.· No renewal of leases.· No military presence on our precious lands.· Our A'ole 'āpuka 'āina, of our sacred wāhipana. 'O ia wale no.</p>	
Sienna Kaske		<p>Military presence on Hawaiian lands has caused extensive damage to the environment, and threatens precious natural resources like water. The three army facilities are home to many endangered and threatened organisms like the 'apapane and 'i'iwi birds. Y'all don't need to be there!!!</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
Masahide Kato		<p>Form Summary Your name: Masahide Kato Email address: [REDACTED]</p> <p>Here are my comments on the Draft EIS: In the Draft EIS, the US Army admits that there will be “significant adverse impacts” on land use (land tenure) and environmental justice with the retention of any lands at Kahuku, Poamoho, and Mākua. Additional personal comments: The EIS is inherently limited in the assessment of the impact on the natural environment as it does not include the entire ecosystem that is affected by the military activities. For instance, the EIS does not mention a broad ecological impact on Mākua or MMR as it only focuses on land use. The EIS needs to include the cumulative effect of the release of toxic materials into the marine ecosystem through the process of bio-magnification whereby the toxins are exponentially concentrated as it goes up the food chain.</p>	<p>Section 2.3.2.1 stipulates provisions for motocross use in a future land estate and states that all public access to the State-owned lands retained would be negotiated with the State or other appropriate stakeholders, for example, to participate in motocross events when the training schedule allows.</p>
Pililuaikekaiohilo Keala		I STRONGLY OPPOSE	Please see General Response.
Louisa Keawe		<p>My name is Louisa Keawe, and I am a Kanaka Maoli. I can prove who my heirs and who my ancestors are. But tonight is not the night to share it with you. This is the proper way. Aloha mai kakou, Kanaka Maoli, and Hawaiians and visitors, mahalo nui for your time and presence here tonight. First of all, I oppose renewing your lease, because it does not exist. What you create can be burned, and so how our land been burned, our land been dug. Trespassing our iwi kupunas, our historic, our sacred lands. So know that this meeting, this actually should be the other way. You should be standing up to us while we listen to you, to ask, not force, be prompt. And then the word respect, I don't know what that word means anymore when I'm standing in front of people, standing in front the army that's not even listening. I make a dare that you guys only might -- the word is not returned. The word is it's time that all the militaries of every service need to put all your okana together and depart safely from our island, every island, especially Oahu. This island looks so terrible that it looks like when I -- when I fly in on the airplane, it looks like a plague. All along the coastline from Honolulu to Waikiki and right around, what's so</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>beautiful with all these buildings? And I can imagine what you guys been building. I mean, I have seen it. So it's time. That's the word. You guys have no permission. And all your proclamation does not show us what we were taught. We were -- we were taught how to be humble, how to listen, and how to ask permission. So that was not given to us from in the beginning, and so it's not given to you folks. So do not say we were not disrespectful tonight. Do not say we don't understand. Because if you can prove to me you have an heir from our ancestors here, you can show me the people, then I listen, the palapala we call it. If you don't have nothing to show, it's time for you guys to go. And if you guys disapprove, it will worry me if you guys come up with excuses or reasons or what you guys intelligent think of. Those lands, if you guys don't remove yourself from it, it's going to be cursed. And I'm not staying cursed to where it's going to affect us, because it's been too long already. The people have already stand, already stated, already given warning, already told you guys way back then. So don't be -- deaf. Don't be ignorant. And mahalo ke akua for all those who stand this day to see that you guys, it's time, not go -- actually, I'm going to use a nice word -- disappear.</p>	
Merania Kekaula		<p>Aloha mai. [Hawaiian/Maori] Ko Marania Kekaula toku inoa, no Aotearoa toku whanau, kou moe tane o Dudley Kekaula My name is Marania Kekaula. I'm from Aotearoa, but I'm married Hawaiian. And that's my whakapapa to Kahuku. I do not support the continuation of the U.S. military leases on any of the Hawaiian lands, on any of the motu in Te Moana Nui a Kiwa. Okay. You need to go. You have none -- you've done nothing but desecrate, causing so much harm to cultures that you could have learned from and how to get closer to Te Ariki Nui. You've destroyed it. And yet, the hand of aroha -- aloha -- was extended to you time and time again. But your people taka here, stamped on it, on their love. All you could think of was your insatiable greed, as demonstrated throughout Africa, Asia, the Pacifica, Te Moana Nui a Kiwa. You got to go. Because I want to tell you something that's very pertinent to this situation, and that is you did not understand that the aina that you walk upon is sacred. You</p>	Please see General Response.



Commenter	Submitted By	Comment	Response
		<p>know why it's sacred? Because it comes from Ke Akua. It has life giving water. And you people have contaminated the water supply for our tamariki, for our keiki. That's our future. You people do not -- do not -- play around with our future. If there's one thing I know, my iwi -- that's Te Moana Nui a Kiwa -- and we will not take is that you harm our tamariki, all right. We have bent over backwards because you thought that aloha was a sign of weakness. No, you don't understand. The people of this motu, of this aina, they are strong, noble people, and you've miscalculated really badly. You know what? They're not going to take any more lying down and letting you people walk over them in the name of saving them from harm. You need to go because you people have tried to -- you have not succeeded. You have not. And if anything that's come of these meetings, Pacific Fest, it's shown a stronger sense of belonging and that we are one. And we're not going to put up with this crap anymore. Thank you.</p>	
Merania Kekaula		<p>Aloha. Aloha. My name is Merania Kekaula. I'm from Kahuku. And my daughter and I were here tonight -- she had to leave -- but we're here to kokua and tautoko our whanau here in Wahiawa, and support the decision to not renew military leases anywhere on Oahu or in Hawaii or wherever you're occupying. Okay? One problem that these meetings have had so far is the process. Since when do you have a scoping meeting before you actually acquire the lease, which you don't even have yet? So why are we holding these scoping meetings? Because you're not following the constitution. Right? If you want a lease, there are certain laws you have to follow, certain procedures. This -- yeah, it's illegal what you're doing. And it's kind of trying to get things done through the back door. Okay? So, number one, we should shut down, go home right now, because you're not supposed to have these scoping meetings for your DEIS. Am I correct? And as for going to see the mayor, or the governor, whoever it is, aren't you supposed to go through the legislature? They're the ones who have created the laws. I mean, you know, that mayor, he only has rights that come from the charter of Honolulu. There's no rights there, not even to a</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>acquire Hawaiian lands.· So it should go back to the people; not go back to the state, who are just as corrupt and big crooks as the federal government.· Okay. [THE MODERATOR:· Can you please wrap it up?] Another thing is -- yes, I'm wrapping it up.· Another thing is that -- and my point is that you people cannot stop what's happening.· Okay?.· I'll give you an example. Through your literature, through your false narratives, through your lies, you've created a situation where you're trying to take the mana and the kaha from the people that you have occupied their lands through that occupation. Well, I tell you what.· You know, there is a renaissance, and it's been growing throughout the decades.· And this example comes from Bikini Atoll. The military bombed that place.· And today, there's still radioactivity.· Satawal is 1200 miles from Bikini Atoll.· And all those islands, all the women gave birth to what they call "jellyfish babies."· No heads.· No limbs.· All because of the military. But you know what?.· There was a miracle happening also.· A man by the name of Mau Pailug, Pailug, Mau, great Polynesian navigator.· All right?.· They nearly killed our great heritage for navigation, you haoles.· Okay?.· That has stopped. He has put a stop to all the lies of your false narratives, that Polynesians came or don't have anything; they just existed there on these islands. No.· Polynesian navigation is alive and well today, and it connects us through (speaking te reo maori) te moana nui akiwa. So all of your lies, your denigration, destruction, you know, you need to stop it.· Because you cannot stop what's happening.· You cannot.· And that is the people want their lands back.· They want their -- their culture, they've already got; but their lands, they need their lands, too.· And they don't want their lands going to the state of Hawaii, which is just another hydra-head like you guys --- of the government.· Thank you. Mahalo.</p>	
Sonia Keliikipi		<p>I, a subject of the Hawaiian Kingdom, highly oppose the potential release of this land to the colonial imperialists which is the U.S Military. For the record, my country is not the United States as I reside in Hawai'i, an occupied sovereign state. These lands should not have ever been given to the imperialistic power of the United</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>States because it was stolen from the Hawaiian Kingdom Government following the illegal overthrow of the Kingdom in 1893 and forced annexation under a "Joint Resolution" that your congress has no jurisdiction over without the signature of the true Hawaiian Sovereign, who was Queen Lili'uokalani at the time. With no valid treaty of annexation your American laws are illegitimate, unlawful and has no jurisdiction here in Hawai'i. You continue to commit war crimes and human rights violations in my country. You've denationalized my people forcing your laws upon us, marginalizing us in our own ancestral land and sovereign state. You will pay.</p> <p>Instead of releasing I ask that you comply with International Law and stop the belligerent occupation you and your empire have bestowed upon my people for the past 131 years as we have the right to self determination. Your presence has strategically denationalized and displaced my people by banning 'ōlelo Hawai'i in schools and inviting migrational settler societies where capitalism conquers all to drive out Hawaiian Kingdom subjects from their ancestral lands. You have desecrated and exploited my people and natural resources. Many of my family have moved away calling it "Priced out of paradise" but really we have been displaced due to a belligerent illegal military occupation. My family has yet to own land in our home as real estate prices rise to the multi-millions, all while the U.S Military has leased these lands for only a dollar a year. The U.S Military should not even be in Hawai'i. What you should do is leave and pay for the reparations your belligerent occupation has caused to my country. You have violated our human rights to self determination and mark my words I will live to see the day you leave and are held accountable for your actions and I cannot wait. E ola mau ke Aupuni Hawai'i. Ma hope mākou o Lili'ulani. E mau ke ea o ka 'āina i ka pono.</p>	
Kapua Keliikoa-Kamai		<p>No Treaty, No Annexation, No Pono Plebiscite, No State, No America!</p> <p>The Hawaiian Archipelago is still the Kingdom of Hawaii that continues to exists under the failed colonization &amp; continuing</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		belligerent occupation of the U.S.A. Leave our lands & leave our home. Mahalo!!	
Kapua Keliikoa-Kamai		<p>Mahalo. Aloha o wau o Kapua Keliikoa-Kamai, mai ka ‘āina ho’opulapula o Wai’anae mai au. You know, thank you, folks, for your patience. And at the same time, your patience is nothing compared to what we have endured. I always wonder why the people that are cleaning this are so far away. Because if it was a kanaka, we'd be sitting right here, and we would have saved a couple minutes, probably, and made it easier. But I'm so glad that Laulani just came. But I also wanted to reiterate that you folks clearly state, all three nights, the overwhelming testimony was opposition to the continued usage of our lands and presence of the military destroying our lands. Okay. We do not consent to that. We never did. We never, ever will. Never. The other thing is, again, what Laulani just said. Because when the DOI came 10 years ago, all of the testimony seemed to get smashed down. And only those that came in the palapala -- which is what Americans do primarily. But kanaka -- he alo he alo. We want to see your eyes. We want to see your face. We are live. You're alive. Let's talk that way. Yeah? So like Laulani had said, you folks have it recorded. Transcribe it. And that way, the 100, 200 people that came are validated. We took hours to come here. And, yes, please do extend these conversations and open the door to more. You will have those few that recognize the value of the military, the federal government, because there is value. Unfortunately, the value that America has in our land is destructive to our lands, destructive to our being. So that is not pono. That is heva. There is value in America, primarily back in America. Because this is not America. We recognize that this is a farce. But we will go through this process so that we'll play the game. Because it's all about playing the game the right way, knowing the rules. But the snakes of America and of that crapitol, it's so slippery that the rules change. It always changes on us. But that's okay. We'll keep -- we will always rise up until the very last. So, mai poina. Yankees, go home. Mahalo.</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
Kapua Keli'ikoa-Kamai		<p>O wau o Kapua Keliikoa-Kamai, no ka 'āina ho'opulapula ka awawa o Waianae mai au. Mahalo 'oukou, ua noho 'oe I Kahuku, mahalo nui no mākou. So having come out all this way, I'm definitely going to say something, try not to be redundant, but you folks have heard this before. So Hawaii is very strategic by our location, always has been. That's why Hawaii has been occupied by the United States. There is no treaty. There is no treaty. There was no annexation. There was no consent. The queen did not concede to America to give us up. She said for such a time when the people of America recognized their wrongdoing and right that wrong. That time is now. War is so ready and ripe that my baby here, my firstborn mo'opuna, may not have a mo'opuna because of what all the warmongers are doing. And America is the number one warmonger. Then you have Russia and China. We have too much bully factors. But regarding the EIS, no-action is the alternative. Not only do we not consent, we want you to go back, practice your war games, your war mongering on your own aina. And I apologize to the natives of that continent, because they didn't want you there either. And they don't want you desecrating their lands either. But you've done that, and so try to respect them like you need to respect the people of Hawaii. We are done. We are done with this. There are 68,500 people that are employed by the U.S. That is 30,000 people way too many, probably 20,000 of our homes that should be for people that want to be here, especially for people that are from here. You know, we talk about all of the impacts, every single block. You folks, America -- not you specifically, Colonel, but it would have been nice to meet you last night, as well, considering you're taking over -- but people have busy schedules, so we'll take that into consideration. Every single one of the blocks, it's a negative impact, what the military is and has done to my aina, to all of our aina, because we receive and we welcome people. So as Kanaka Maoli, we know that this is our home. But we welcome other people that want to live here for what here has to offer. We love to be improved, to get better. But if this isn't good enough for some people that think it's a state, maybe</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>they should go back to the continental 48. They should go to those other places that actually chose to be a state. This is a fake state. I know who I am. He Hawai'i au mau a mau. I am a Christian by choice, Kanaka Maoli by birth, American by kidnapping. Identity theft, America committed that amongst all of us that have been born here since January 17, 1893, or since a provisional government or your so-called annexation. My Kingdom of Hawaii continues to this day. And this will come out. This will come out. So I do this for a matter of record because it's beyond you, Kehau. It's beyond you. But like Tita said, yeah, we do not consent. We never have ever consented, and we will never consent to being American or a part of America. Except for those, you know, indoctrinated American patriots, so be it -- everybody should have a free choice. But us Kanaka Maoli that have learned our history and have been able to overcome the anger, the pain, the suffering, the trauma that has occurred, not just to me and mine, but to my parents, to my kupuna that came before me, they had to survive what treasonous people did to our queen. So they had to hamau, and they had to go under cover. They survived, and we kept the ike. We kept all that was important to a people so that we can continue for our babies. So I want to thank you so much for staying out late again and thank everybody for having us. But Yankee, go home. Mahalo.</p>	
Kapua Keli'ikoa-Kamai		<p>Aloha. Aloha. Mahalo for coming to our Waianae community. As many of us are already woke, we know that we're just going through a farce process. But in this process let us educate you in what we have learned. Most recently, in 2014, when the Department of the Interior came down to Hawaii to speak to the Kanaka, to speak to the people of Hawaii, we told them we don't want to speak to you because our kingdom continues to exist despite -- despite all the lies that America, this fake state, and all the governments that were too afraid to stand up to America back in 1893 to this day. . . . . But we Kanaka Maoli, we are teaching our children, our mo'opuna our history. We have pride because we are so proud that our kupuna survived the travels through these islands that Kalakaua himself put us on. Because it is our kuleana to</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>malama this land, and what the Army of the United States of America and all of the other armed forces continue to do is to kill, massacre, destroy. . . . . And it -- this is not on you, Colonel. This is on those powers that be, like all of those men that say, yes, let's go into a conflict; yes, let's have war. If only they sent five people from their personal family, maybe they would not be so quick to say yes. Maybe they would be more open to negotiations because Hawaii is Aloha and Aloha is not weakness, but it is the ability to communicate from our heart, from our na'au, what Kalakaua has given to us. He has put us here to protect these islands and all the people that come here, like our kings and our queen. We knew that that was just another form of American slavery. Plantations. That's what it was. . . . . But we here of Hawaii, we know that we are all equal. Kalakaua brought us here and we have to find our place with each other to make it work. But the Hawaiian system was not an easy system. . . . . You mess up, the people will take you out. The American system, if you have money, if you have power, it doesn't matter what you do because look at what that other guy has done; 34 convictions and yet there's a supreme court that says, a president has a protection, immunity. But that's not for all the people. That's only for certain people. . . . . And our history we did have those certain people because they knew how to treat us. They knew how to malama us and take care of us. And it's from the top down that we are the way that we are today. . . . . Despite all of the hewa, despite the genocide, all the illnesses, all of the atrocities that have been put upon our people and our land, it is not a coincidence that Hawaii is known as the extinction capital of the world. It is because of foreigners, foreign species, coming here and not recognizing the value of what Kalakaua put in the middle of the largest ocean on this planet. . . . . It is not our intent to destroy, to overcome, to conquer. It is our intent to exist as one with our akua, with our beings, with each other and that does not mean that we do not have discord. Of course we do, but one fallacy our people, is don't let them try to tell us that we have to be one. a'ole. We do not have to be one, we just have to rise up. We have to rise up. So</p>	

Commenter	Submitted By	Comment	Response
		<p>regarding this EIS, there is nothing environmentally sound as so many people have shared. I oppose the options, the alternatives that that report provides us. But we don't have to stick to that report. like, William has said, we want the alternative of no -- no a'ole to the American Military destroying our lands. . . . . And although other people have been generous to say that we will clean it, we'll clean it with the American dollars, and it won't be no 400 million. We are talking in the billions just like Lahaina. Just like what RIMPAC is doing to our ocean, to our animals, and here in this hub. So mahalo, mahalo for your patience.</p>	
T Keliikuli		<p>There needs to be an end to this madness, and a perfect place to start is with our 'āina. KEEP HAWAIIAN LANDS, IN HAWAIIAN HANDS.</p>	Please see General Response.
Chase Keliipaakaua		<p>I wholeheartedly oppose the renewal of military occupation in Hawaii.</p>	Please see General Response.
Briana Keo		<p>Aloha Pumehana,                      'O Ka'ili Keo kēia. My name is Ka'ili Keo, I am a kanaka 'oiwi, wife, mother, and certified nurse midwife. As a young child I have seen the heartaches and struggles my 'Ohana and po'e have gone through to perpetuate our language, culture, and beliefs. I've seen our beautiful and luscious 'āina over developed and depleted of our natural resources by outsiders and foreigners. It has been far too long that our kanaka have struggled with the consequences of other people and country poor choices in land development and use. With the end of the Army lease this is the time for some good to be done for the 'aina and kanaka 'oiwi who belong to Hawai'i. The lease should not be renewed. It should be given to the po'e of this 'aina who know how to care for the precious and limited resources. Furthermore, kanaka 'oiwi have many non profit organizations that have proven to build self sustainability as well as perpetuate and rebuild our cultural site. It has been done in the past with Kaho'olawe and now comes a time again where the past wrongs may be put to rest and set forth for restoration and peace. I urge and testify that I stand in solitude with all our kanaka 'oiwi o Hawai'i to return these sacred lands in Makua, Kahuku, and Poamoho to the</p>	Please see General Response.



Commenter	Submitted By	Comment	Response
		<p>po'e and organizations that can restore our land and resources.  O au iho nō,  Ka'ili Keo</p>	
Jonah Keohokapu		<p>I support ending leases on lands stated in this draft EIS. The illegally occupying american military have continued to poison our waters, polluted our lands and desecrate our sacred sites and spaces. The illegally occupying american military consistently destroy occupied lands in Hawai'i for a dollar while our people are priced out and pushed out of our own homelands. These leases and all future leases need to end.</p>	Please see General Response.
Milton Kim		<p>Aloha,  My name is 'Ekolu, and I am kanaka maoli (indigenous person). I do not support the extension of your leases on Hawaiian land. Since your leases began, the impact on our ecosystem has been destructive. It is crucial to protect native Hawaiian birds, plants, and trees for future generations.  Please accept my message with aloha, and understand that our aim is to ensure the safety of our 'āina and to provide housing for Native Hawaiian people and our 'ohana on our ancestral lands. We hope you will hear our plea to return the land to its native people so we can thrive and once again be the stewards of Hawai'i, as we have been for thousands of years.  Mahalo,  'Ekolu</p>	Please see General Response.
Kamanawa Kinimaka		<p>It's as if cracking Kaho'olawe in half wasn't a sufficient kind of example of what can happen when using gun exploding hardware. It's as if the phrase "learn by example" was overlooked and never academically applied, perhaps never uttered.  It's as if "be better than the last" was never a valued thought to be lesson worthy.  We're all taught to clean up the mess we made or suffer the consequences. One would think preventive measures of any sort would come into play somewhere to avoid anymore unnecessary suffering right?! Sadly no.  Instead What came in it's place was irreversible land destruction,</p>	Please see General Response.

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		<p>multigenerational trauma and devastating environmental pollution. They're Really not the type of lease holders one would desire to renew wouldn't you say?                      And It must be said, Aloha is Law!                      Without Aloha we would not be here.</p>	
Candice Kirby		<p>US government has no business in Hawaii. The leases for \$1 are an insult to the residents of this land who struggle daily to survive. The US military needs to vacate the entire state and return the land wholly and without waste/damage to the DHHL</p>	Please see General Response.
David Klein		<p>Mahalo, guys, for giving us this opportunity to talk. My name is Dr. David Cline. I finished my doctorate in chemistry at the University of Hawaii at Manoa. During that time, I took classes with Haunani Trask, and I learned about Hawaii having been from Texas when I first got here. . . . . After that I went to Kaho'olawe for 40 years. I was there when the island was given back. Kaho'olawe was cleaned of 75 percent of the UXOs after \$350 million was spent, and there's still more UXOs coming out today. On Kaho'olawe they told me one time if you buy a car and the police stop you and they tell you your car is stolen, is it yours or is it stolen? . . . . . You've heard today I think you're dealing with a state and they're dealing with a stolen land. So you're trying to buy something from a place that doesn't have a legitimate title to what it is you want. . . . . Makua stopped live fire, so why do you need it? Because it's expensive to clean up. That's the problem. There's no islands in the Pacific that need that training anymore. And having been from Texas I can say that I know there are 29,000 native Hawaiians on the Hawaiian home list that has been there since 1921, and they could certainly use the lands that the military is not really using for anything now. . . . . My suggestion is to take this and to move it to Texas. They like you there. They have a million acres of land in Texas. They want you in Texas. Mahalo.</p>	Please see General Response.
Maisie Klem		<p>To whom it may concern, I am writing in regard to the recent Drafted Environmental Impact Statement of the US Army's possession of 6,322 acres of land stolen from the Hawaiian Kingdom. I am fully opposed to the renewal of the Army's lease of</p>	Please see General Response.

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		<p>these lands upon the lease’s expiration in 2029. The Army’s illegal occupation of these lands infringes upon Native Hawaiians’ right to cultural practice, a healthy environment, and land governance. The decades in which the US Army has occupied these lands have resulted in destruction and displacement of Native Hawaiian communities, and have created a legacy of environmental, economic, and social harm. The only solution to these problems and the only way to prevent their occurrence in the future: give land back to Kanaka Maoli and cease all operations at these sites, on O’ahu, and in Hawai’i. Thank you, Maisie</p>	
Teresa Kling		<p>The EIS is required to assess the direct, indirect, secondary, and cumulative climate-related impacts of the Army's future use of the leased O’ahu lands. These arguably include impacts associated with the larger strategy of Indo-Pacific "deterrence" for which Army Gen. Charles Flynn claims the lands are essential.</p> <p>Such impacts would include: the cumulative reduction of our long-term food security, by the occupation and unremediated contamination of historically abundant agricultural lands which, in turn, contributes to Hawai’i's climate-vulnerable dependence on imported food; the continued disconnection from and harm to ‘āina that disproportionately affects Native Hawaiian health and wellbeing which will be increasingly challenged by climate destabilization; and the carbon footprint and impacts of the national and multinational exercises that would depend upon the retention of these lands, as well as that of the United States' "rivals" who will only increase their own military carbon footprints to "deter" the U.S.</p> <p>The current draft EIS fails to evaluate these concerns. Cumulative impacts on food security and Native Hawaiian health and wellbeing are not assessed in the broader context of climate destabilization – which the Department of Defense (DoD) has an immense role in accelerating.</p> <p>Hawai’i will not let the Department of "Defense" turn a blind eye to a future of destruction and devastation that it may be hastening for</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 lands, and does not include any new or changes to existing training. KTA Tract A-1 is the only State-owned land parcel within an agricultural State Land Use District (SLUD). Section 3.7.5.1 of the Final EIS has been revised to explain that the Proposed Action would not have a measurable secondary effect on climate change-related food security issues.</p>

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		our ‘āina and our children – and we, and the rest of the Pacific, and the world, will be watching its response.	
Tia Klug-Wessell		The United States Army , A Ole. This land was illegally taken and still is. You desecrate the people, the land, the culture, this place. Give the land back. This is what is Pono Loa. And if not, Why are you not “leasing” the land back to the PEOPLE for \$1 for 65 years? That’s the next best thing. I’m not sure why we the people have to tell you this. You all know we are right. Legally and morally. I guess the question that remains is, which side are YOU going to be on. Are you a good person or a person who aids the criminals? We will see..... Tia Klug-Wessell	Please see General Response.
Tina Knapp		You have "leased" the land for 65 years for a single dollar. Using the ‘āina to train and go commit war in other countries while you OCCUPY this one. How insulting it is to know you feel you have a claim to this land. That you deserve to stay on it and pretend you're "stewards". Bombing Kaho'olawe wasn't enough, Poisoning O'ahu wasn't enough, leaving depleted Uranium in Pōhakuloa wasn't enough, Rimpac is not enough. It will never be enough. The US was born out of colonial genocide and has maintained itself through it. Your reassurances of land stewardship mean NOTHING compared to your history of destruction. No, you should not be allowed to continue to lease this land that YOU OCCUPY so can practice occupation on another people.	Please see General Response.
Alesa Ainalani Kneubuhl		Yep. I'm 243. Aloha nui. Who can follow that? Right on. Right on, Andre. Land back. Let's get a round of applause for that. Aloha nui. My name is Alesa Ainalani Kneubuhl. I'm speaking to you from an indigenous perspective as an Oiwi of this land. This ongoing desecration needs to end, and I oppose the lease extensions. I grew up in Kula on Maui, and the childhood backdrop to growing up there was listening to the bombing of Kaho'olawe, listening to the military crack the water table, and basically bomb that island until it was hardpan and it was bleeding and raining off into the ocean around it. So that was a hard reality to grow up with. And it's nothing compared to what the children of Palestine are going through. But the overarching values and themes that we carry with	Please see General Response.

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		<p>us as Hawaiians are about aloha 'aina. Everything that the military does to train on our lands goes against this concept, goes against loving the land, being good stewards to the land. The ongoing desecration and threat to the environment, the ocean, the land, our 'aina, the spring water, all the sources, all the organisms that live here with us -- these organisms, we also consider our kupuna and our ancestors -- they have no voice in this. There's continued limited access to the public --namely, the Kanaka Maoli -- to access and cultivate and care for lands, especially Makua Valley. What will the environmental impact be if these lands aren't rehabilitated, cleaned, and returned? The larger concern is the ongoing abuse and desecration of our land. The actions of the military have had dire impact on our people, our land, and the long-term implications, the health of the environment, the spiritual and psychological well-being of our people. At this point, it's about doing the right thing, and that's cleaning up, and having minimal to zero presence, reducing your footprint. These state-owned lands that you leased for the last 65 years, ending in 2029 -- just a few -- just a few more points that I wanted to bring up, from the EIS. One of the things that I read was, over the past six decades, the state-owned lands have been an important portion of the approximate 18,000 acres on Kahuku training area, Kawaihoa, Poamoho Training Area, KPT, Makua military reserve, and of the approximately 51,000 acres of Army training areas across Oahu. That's 51,000 acres. That's a lot of land. And there are a lot of us who don't have any land, no homes. And it's just not fair. It's not right anymore. And we're talking about 6,322 acres of leased state land. So this is directed not just to you, but to the BLNR and to our state, who we also have to hold accountable. Not just to you. Thank you for your time. Aloha.</p>	
Hina Kneubuhl		<p>Aloha mai,                      I am completely and unequivocally opposed to the retention of lands by the American military. I grew up watching Kaho'olawe be bombed and destroyed by the Navy. I have long heard about the dumping of toxic waste by the military in both Pu'uloa and Wai'anae. The pollution of the O'ahu water because of the Red Hill</p>	Please see General Response.

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		<p>fuel leaks has been grossly mismanaged and the lies, coverups, and a lack of accountability have fueled the hatred that our communities have for the American military industrial complex. Your war-mongering machine causes suffering all over the world and Hawai’i wants no part of it. The revolving door of funds that enables the military and weapons developers to continue to build a terrorizing force for intimidating other nations who do not want to be robbed by the US is disgusting. Being in bed with the weapons manufacturers that are arming the genocide in Palestine makes you complicit. The world is in crisis because of these things, so we want no part of your death machine. We want our lands and waters back and we want them kept clean and free from your defiling and extractive ways. I do not support a single acre of land staying with the military, but our lawmakers will likely not have the courage to take back all of our lands, which the military and others are illegally occupying. So if the military is to continue to lease ANY lands, it is imperative that they pay market value rents for those lands. \$1 per year is OVER. This slap in the face of every Hawaiian has had its day. UA HEWA. KE NOHI HEWA NEI ‘OUKOU MA KO MĀKOU ‘ĀINA. E HELE PĒLĀ.</p> <p>Na’u,                      Hina Kneubuhl</p>	
Line-Noue Memea Kruse		<p>My name is Dr. Line-Noue Memea Kruse. I live in Kualoa. I am testifying against the U.S. Army retaining any state lands anywhere and outside of the three installations, including the three installation, or otherwise using the lands for secret army installation and combat readiness training as your website states. I am against retaining all the land. I am against retaining most of the land. We are here only for the three installation sites, which as you said earlier, is 6,322 acres of state lands. But the entirety of the U.S. military leases is 18,000 acres, which we have yet to discuss. I am testifying in strong support of the no-action alternative, no retention of state lands after 2029. As a planner by trade, it is highly manipulative of your U.S. Army’s website that hosts the EIS description. They call their continued state land lease simply a real</p>	<p>Chapter 1 of the EIS (Section 1.2) describes the uses of the Army training lands; Section 2.2 includes descriptions of specific training that occurs on each of the training areas, including use by other services.</p>

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		<p>estate estate action. Look it up. I was born in 1976 here in Kahuku. My entire life, as was stated earlier, all I've known is the army that uses this land. They come with a lot of guns and their convoys right here in the cafeteria and Y building and W building, the administration. You can hear the helicopters. You can hear-- Ona sa'i mai --You can hear all of these helicopters and army training. You cannot access these lands for \$1, because you require more lands to access the lands in what you use for the lands. Question. Does anyone know over 60 years what these lands are actually used for, the land uses? And any time, has the U.S. Army given any of us any substantial evidence as to what the land uses are, what it was before they landed here, or what they're using for right now? Anyone in this room? Wellbeing. I am a graduate of Kahuku High School. My four children attend this school. Right here in this cafeteria is where they eat. Question raised earlier, the army and the EIS constantly talks about historical. I'd like to talk about wellbeing. For those of us that use these lands, <u>what do you use these lands specifically?</u> In the army website, there is no detailed, except for maneuver access and training. <u>What do you use these lands for?</u> How can we, as Joy animated earlier, provide evidence or talk about the impacts to environmental devastation of diverse lands if we have no idea what your lands -- <u>how you're using the lands and who is using the lands overtly and covertly?</u> This is highly improper for us. And you expect us to provide testimony for things you've never provided us information about to begin with? There is no public information on your website, on the U.S. Army website, on the state website, on the federal website, on what exactly lands here in Kahuku, or KTA, have been used since 1964, 60 years. Anyone here know what these lands are used for?</p>	
Line-Noue Memea Kruse		<p><u>In terms of 1,150 acres of how much of these lands are used with expressed and leased purposes, how can you evidence to us what the biodiversity or what the priority for army maneuvering exercises defense sites when dealing with basic military transportation?</u></p>	<p>Section 3.3.5 has been updated with the most recently available distribution for native and protected species.</p>

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Line-Noue Memea Kruse		<u>What has the military provided to our community?</u>	Section 3.11.5 discusses the socioeconomic impacts of the Army retention of these State-owned portions of the training areas.
Line-Noue Memea Kruse		What is the comprehensive, spatially explicit analysis of its land use, land use change by a diversity content, when it comes up to right now, 60 years to July 11, 2024?	A spatial analysis of land use diversity over the past 60 years is outside the scope of this EIS.
Line-Noue Memea Kruse		The EIS is not for me to -- to prove to you what damages to the lands. It is what for the army to prove to us how you are going to leave the lands, how you received it before you landed. There is no army installation in all of America where the lands were left before you arrived. Therefore, the community does not have to prove the negligence or your negligence to what is happening to the lands and how it's impacted adversely today. The army must prove that to us. If after 60 years you have not done that, I will absolutely take no-action alternative, and everyone should, because it's your kuleana to provide that evidence to us, not stand here and provide that to you. This is ridiculous. Mahalo.	Please see General Response.
Donna Lee Kuehu		No retention or renewal of all leases. Complete clean up and restoration of lands. Redirect efforts towards peace making, which would require less war training efforts and resources.	Please see General Response.
Manuel Kuloloio		Aloha, Colonel. Nice to see you again. Ma'am. Kehau. I would like to follow in continuation of what I said Wednesday night, having just come off a plane from Maui, and gone straight to Waianae. Colonel, if the fire on Haleakala doesn't get stopped by noon tomorrow, send two chinooks for the general. Send them to Maui. I'm asking you. Okay? I heard Brother -- where's Andre? Andre, you here? One day I was asked to bring my Ford Toyota truck, and park it next to a nuclear submarine. And I was asked to repair something in that submarine for three days. I don't think anybody has ever parked a truck next to a nuclear submarine. But, Colonel, I won't tell you what I did. But I'll never forget -- I know Kehau -- I'll never forget that when a submarine had smashed into an underwater mount someplace in the Pacific, I was there monitoring. There are no secrets. And as I said, I'm the son of a US Army veteran, and I'm	Please see General Response.



Commenter	Submitted By	Comment	Response
		<p>very proud. But I also challenged you, sir, that I got to do my part, if you can give back Makua. And you don't have to wait until 2029. That was my challenge to you. Kehau. I brought up about being welcomed into the home of John and Marion Kelly, at kupi kipi keo, at 4117 Black Point Road. Yeah? And I brought in a helicopter to honor him as a trainer of the UDT, the Navy Seals. And he said, as a young ensign, during the bombing of Pearl Harbor, it was hard for him. He spent a whole week removing bodies out of Pearl Harbor, and putting American and Japanese servicemen into the same coffin at Fort Shafter. And he said, "Manny, when I die, I want you to tell this story of how I recovered war-shot torpedoes off of Kaho'olawe." But, Kehau -- heard the sister -- I don't know if she brought up a copy of Auntie Marion's study. Mai ka'i. That's the study she gave me. Right? I told you that night, Kehau. Print that study, please. I will pay for the copy and give it to the colonel. Okay, Colonel? Just read it. Promise? Okay. Because you'll never be the same. And I talked about Vieques, because, Kehau. The word "expropriation" is what they did in Makua. And when I went to Vieques right? Because, you know, he said, Emmet, you cannot go. So I went. It's the same thing they did to them. It was called the "expropriation" of these people. And so, Colonel, I purposely didn't go to Kahuku because I'm not ma'a with them at that place Kehau. The only time I ever been up there was by helicopter. And as we did the model clearance for Kaho'olawe in 1995, I was in the front seat with Uncle Tom Hauptman. He and I, we celebrated our successful cleanup, and we wanted to go skydiving. So as we came across Makapuu, he showed me where he had crashed, and all the work he has done for the military secretly. And he says, "Manny, I want you to look over the right side. Tell me what you see." And I saw all the training grounds, Kahuku. And so, for any Hawaiian in here, don't forget. Kamehameha schools owns lands up there. And if you guys remember, when Chief of Staff General Shinseki, a local boy, wanted to build his Stryker brigade -- and -- okay. I'll -- give me give me chance. You guys remember? Did they ever bring the Stryker brigade, by the way? Aole. But they went build Drum Road.</p>	

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		<p>Right, Kehau? Okay. And that was a celebration for me. Now, the left side, Kehau, is you do your part, Colonel, and I'm going to do my part. We talked about the governor. We talked about the land board. We talked about Auntie Dawn Chang. My only comments I made in the scoping, Kehau, none of them got answered, by the way. But that's okay. Okay? I'm not going to tell you the three things that I asked. But one of them was Kawika. Show me one American bombing range that they've ever clean up and given back. Just show me one. And if you show me one, I will be the greatest champion and apologist for the United States Army in Hawaii. But you know what? I was grateful, Kehau. I don't know if it's you, or the colonel. You could have shut this thing down at eight o'clock, but you never. Thank God, you never. Let the people speak. Whether or not you extend them, I don't know. But I came face-to-face. You hear my voice. So when my voice goes out into the heavens, and my kupuna looking down on me, all the guys that will protect me, I -- I owe it to them. I owe it to them. As I said, I'm the only person in my family didn't serve, because I thought they would frag me someplace in the world and say that I committed suicide. But, Kehau. I have greater love for you. Thank you for convening this. Colonel, just read the report. Okay? It will touch you. You'll never be the same. And I gave you those two names who to talk to. You want to give it back before 2029, as a giveback. It's the right thing to do. Okay? Yeah? And finally, I get nervous when I come Leilehua. When I come into this town, I'm thinking of it. When I went to Vieques -- my last thing here, I promise. One minute. When I went to Vieques -- I loved that admiral that came in the suit. Is the admiral still here? And that Ms. Locidian, is she still here? Is she? Where is she? [THE MODERATOR: No. They left. They left, Manny.] See, I'm the type -- I like to hear everybody speak. I like to hear everybody. Okay? But when I went to Vieques, Kehau, I called up a general from Lockheed Martin, and I said, "Lockheed Martin, tell me, when I go to Vieques, Puerto Rico, what should I do?" What do you think they told me, Sister? No. They said, "Manny, be a very good listener for three days, and don't say</p>	

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		<p>nothing." And while this was going on, 60 Minutes was doing something about the returning of the Panama firing ranges. And they did something about Kaho'olawe. So, sir, the last question is our politicians. No more guts. People like to brag recently in the news that we're going to go -- we do humanitarian things throughout the world, defense, during humanitarian crisis, hurricanes, natural disasters, man-made. You know, Colonel, when I saw Lahaina, I was waiting for the amphibious ship to come offshore and just shuttle food and water, like we do everywhere. I'm still disappointed. And I told Admiral Aquilino, if I was sink back, if I was PACOM, now called "Indo-PACOM," I would know exactly what the hell was going on in Lahaina. My own intelligence. That's what we deserve. Okay, Colonel? And so --- if any of you -- the reason why we got to give them back, sir, if you ever went to the courthouse at the federal building called Hale Nonoi, yeah, for the radio, how many of you was there for the last briefing? I know you was there, Marti. I saw you. How many of you was in there? [THE MODERATOR: Manny, please] No, Kehau. I'm going to tell you this. You know what's the sad part, sir? The American government attorneys said it's all your fault, pre-existing condition, and no worry. Because the fuel has a half-life of two to five days. And within two to four days, it's going to be out of your body. And when I heard that, Colonel, Kehau, Kehau, I'm like, "If they do that to their own people, what you think they're going to do to me as a Hawaiian? And, Kehau, I walked out of that courthouse, and I jumped on a plane, and I went to Kahului Community Center to protest the 767 telescopes going for the Air Force. So the question to G70 kahu was "Show me." Give me the best native Hawaiian scholar, and do a cumulative impact for me as a Hawaiian. Haven't seen it yet, Kehau.</p>	
Manuel Kuloloio		<p>Hello, Colonel. How are you today? My sister. This is the same meeting, Kehau where we were up at Leilehua right? During COVID, right? We had, like, 47 HPD officers. I was there. And Lynette Cruz, Kyle Kajihiro, Uncle Sparky. Who else was there, Kyle? Yeah. Plenty guys. What was the reason it got cancelled by the way?</p>	Please see General Response.

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		<p>[Moderator: Delta] What is Delta? [Moderator: That was the COVID variant.] COVID Delta, okay. So we had the Zoom after, right? Okay. So I read just over 10 G70. I read all your binders. I thank all your staff for staying, every one of them. Thank you for extending this beyond 8:00 o'clock. Because that's what's deserved. So, Colonel, I'm the son of a U.S. Army cryptologist that proudly served. When he went to Georgia he went into the white bathroom, white's only, and they said, boy, get out of this bathroom. So my dad went to the colored bathroom, and they said, boy, get out of this bathroom. But he was very proud to serve and a proud Hawaiian. . . . . And when he passed, I gave him full military honors by the United States Army. Overlooking our property in Makena Bay, looking 8 across three miles to Molokini and the forward to kahola of the island where my dad was asked by the protect kaho'olawe ohana of the Ohana at the disappearance or murder of George and Kimo Mitchell -- George Helm and Kimo Mitchell to run water safety. . . . . So I was trained, sir, by guys from Green Peace. I look like a monk seal now, but I lived with a Navy SEAL called John Kelley and when he died, I gave him fully military honors with a helicopter from Maui above and below. . . . . I'm here Kehau because you're here. I'm here, Colonel, because as a young man I remember -- they call him Poka Laenui. I knew him as Uncle Hayden Burgess. I knew the wife as Auntie ---- Pua ---- on kahoolawe. I'm the youngest guy in the PKO that knows this story. And I remember Uncle Fred Dodge would come to my grandma's house. I remember sitting on the pualele with Mr. Aila. And I've always come. I never knew what the PKO took of the position, but I came anyway. And I remember sitting on the right side of you and Mr. Aila was on your left in Nanakuli. Remember? And I promised I would never go to Makua until the place got returned to Mr. Aila. And it's similar to when I was asked to go to the island of Vieques on behalf of Dr. Emmett Aluli, but Inouye told him don't go, so I went. . . . . And when I saw the fisherman like Carlo Zenone and Ishmael Guadalupe across the 20 gates in Vieques holding -- yes, sir. Yeah. Protesting with the riot police, men and women from the</p>	

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		<p>governor, you know what the United States Navy did? They hadn't bombed for a long time, but they sent these battleships with a bioluminescent bay, sir. You know what I'm talking about? And at exactly 10:10 they went boom, boom, boom, boom, boom, boom. Just like saying, Mr. Emmanuel WMD Kuloloio from Haluanoa, Maui, welcome to Puerto Rico. I am the most powerful force in the world. What you going to do? My life has never been the same, and that's why I came tonight. . . . . Sir, I was on runway 2 when the U.S.S. President landed on 11/11 on Maui. You go back and tell the National Security Advisor, that Mani said give back Makua. Because you know why, sir? Not only is it the right thing to do, that's the Army that I know. Brought up Smedley Butler, War is a Racket. That's the book given to me by John Kelley who helped recover war shot torpedoes with Admirals Momsen and Lockwood off Kaho'olawe Island. . . . . What an irony. Did I ever tell you that story? But I'm telling you, sir, is because of the humanity. He knew it's the right thing to do. And you know why? When I went to live with Marion Kelley and Uncle John, you know what the first thing Auntie Marion Kelley did to me? She says come sit in my rocking chair, and she went to her -- the house was full of books by the way. I read every books from Ludwig von Mises' Socialism to Das Capital. She pulled it off, and she said, Mani, I want you to read this. Do you know what it was? It was about the expropriation of all the families from Makua Valley. She was anthropologist, right? I read them. So when I hear all these names tonight, I have no choice, Mr. Aila, but to come and testify. It's the right thing to do. And you know why? I cannot imagine my two children living with palms on the opposite side of the -- that should never happen. And, sir, kindly in my heart I came tonight because the president stopped the bombing of Kaho'olawe on my birthday, October 22nd. We know how to do it. There's a way, sir, okay? And you know why? Because if Josh Green is still the governor he will have a play and if Auntie Dawn Chang is still the DLNR chairman, like how you were, Mr. Aila, they will both have a play. And I'm not going to</p>	

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		<p>make it easy on them either.· So don't feel like it's all on you, okay?· But if you do your part, we do our part, right?· Okay.· Sir, thank you.</p>	
Manuel Kupahu		<p>No to military occupation and leases. They pollutes hawaii's lands and stolen and took the king dome of Hawai'i. We don't care how much money you have. No more buying of Hawai'i land or leases. As a native Hawaiian and Hawaiian homestead lease. I say no to renewing lease. No to the illegal over throw of Hawai'i, no to poluting our streams like they did to red hill posh Kulia, kahuku, Pearl Harbor, waimanalo Kaneohe, Kailua, very military base they destroyed it, every gold course they stole for their please. Bellows is another ceded lands of our kingdom and they have that for cabins, recreational us, mini golf a tourist military place that they forbid us for grass passing on bout beaches. Kaneohe military bases for taking all our fishing ponds. Military lies to the illegal state of Hawai'i. I am not an American, I am not an American. You forced us to become part of America. You silence us. You stole our land. Now we have to live by American law and force us to become citizens or get locked up by your law if we pursue our own lands of the kingdom of Hawai'i. We are forced to work to buy our families food because of your ways and war. You want to renew your lease. I say a'ole! no! No! No! Good bye. Foreigners get out of Hawai'i. Especially you the military that destroys our lands. You have me respect. Greedy country's using our oceans to be bombed by pac rim. Go practice in floods or California. PAC rim get out of here</p>	Please see General Response.
Sunnie Kupahu		<p>The military should no longer renew their leases. As a native Hawaiian, no more destroying and poisoning our lands. The Hawaiian nation still exist and the United States are illegally occupying The Kingdom of Hawai'i. We are an independent state. Free from all other countries. We don't want to be run by other countries. No to any more leases held by the United States of America. United States lease thousands of lands . They say they want to protect us. Hawaiians don't need occupying forces, we don't have enemies. We are its own country, you invaded us because you don't want Russia, the British, Germans, the Japanese to take over Hawai'i because we are so close to United States of</p>	Please see General Response.

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		<p>America. Well guess what we don't want to be ruled by any of you. Foreigners are invading Hawai'i and buying all our land. It was never for sale. Me and my Hawaiian family of 6 don't want military in waimanalo, Kailua, Kaneohe, kahuku, Makaha. They lie and steal our native Hawaiian land. They band us from our beaches and our mountains for gathering and say we are trespassing. They build golf courses taking our land for pleasure all the wile we Hawaiians can't even hold a roof for rent over our families. Losing jobs to foreigners. Drugs being brought in from other counties. The United States is sure doing a shitty job overtaking and tuning a shitty government. Benefiting not only United States but other countries buying Hawaiian land. You foreigners are polluting our Aina. Get out of Hawaiian and let the king dome of Hawai'i rule its lands and protect it from polluters and greed.</p> <p>Leave Hawai'i, get. Out of here, you are not wanted. You destroy and polite our water and bomb our land. You think it's a resort where you can have special housing, special gold course's, entitled beaches that was protected by ceded lands, royal hawaiian lands. Leave and get out of here. You lie about red bill. You lie about all the injustice and crimes you have committed to all Hawaiians. You should never lease or buy the kingdom of Hawai'i lands. This is not America, this is not America, this is not America.</p>	
Sharon Kurshine		<p>I'm not big public speaker, kind person, so -- sorry. I'm one of those weird people that always sees positive, and so I want to plant for you the seed of what positive would happen for you if you did not have this lease renewed. Consequence. There is nothing more important in military training itself than understanding the nature of consequence. And if you, a bad tenant, are allowed by this landlord -- let's call it, yeah -- to renew your lease, you will not learn consequence of what your actions should have. And so as a mother, teacher, ex-military, I tell you it would be good for you to lose this lease, to learn the consequences of your actions, and to install that into your training. Mahalo.</p>	Please see General Response.
Bryan Kuwada		<p>Aloha nui kākou,                      My name is Dr. Bryan Kamaoli Kuwada, and I am writing to oppose</p>	Please see General Response.

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		<p>the continuance of leases to the military through the Army Training Land Retention. I would like to lend my support to the No Action Alternative.</p> <p>I am a professor of Hawaiian Studies at the Kamakakūokalani Center for Hawaiian Studies, but my father was in the Air Force for over twenty years, and I grew up on military bases around the world, including here in Hawai‘i. I also worked summers on Hickam AFB doing manual labor, and what I saw was a complete and utter disregard for the ‘āina upon which those bases were located, not just by higher-ranking members of the military but even just the regular enlisted soldiers and their families as well. The military provides many benefits to soldiers and their families, including the "benefit" of free water and electricity. That leads to a commonly dismissive attitude towards the resources of the ‘āina that they are on because, and this is something I heard regularly from all levels, "we don't pay for it." Thus along with the active damage that the military perpetrates on our land and natural resources with their live fire training, this dismissive attitude, compounded by the fact that military personnel rotate from posting to posting every few years, leads to an absolute unsuitability for those military personnel to act in good faith as stewards for the land because who cares? They are not paying for it and they are not going to be there to deal with the consequences in a few years.</p> <p>The approach that the military command takes towards our ‘āina also makes their own soldiers unwittingly complicit in the destruction of our land and what sustains us upon it. I once met an Indigenous professor who I respected greatly, and after talking for a while, he quietly pulled me on the side and on the verge of tears told me that he wanted to apologize to me. He had been in the Navy as a young man, and his ship had taken part in the shelling of Kaho‘olawe. His duties were not even directly involved with the attack (I think that he mostly spent his time painting the ship), but even then he did not feel right about it, and the more he learned about his connection to his own land after leaving the Navy, the more he felt a terrible remorse for what he had taken part in. Even</p>	



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		<p>though I am very critical of the military, I cannot imagine that he was the only Indigenous or even ethical person on that ship with a conscience, so imagine the psychic/mental damage that you are doing to your own people by making them complicit in these acts of damage, destruction, and desecration against the very thing that has given us life on this planet.</p> <p>I am sure that the other testimonies have already made it clear the history of neglect and outright violence that the military has perpetrated against our land through live fire training, improper storage of chemicals and waste, resource usage, detrimental effects to the local economy and more, so I just want my testimony to point out that not only are you hurting us, the generations upon generations who do not leave this land every three years and will in fact never leave this land, you are hurting yourselves too and making the least powerful of your ranks complicit in these terrible acts.</p> <p>To reiterate, your history of neglect and violence against our 'āina alongside a pervasive attitude of ignorance of who actually "pays" for the way you interact with our natural resources makes the military singularly unfit to steward these lands and their leases should be terminated.</p> <p>me ke aloha,            Bryan Kamaoli Kuwada, PhD</p>	
Jessica Kuzmier		<p>I am writing in opposition to the renewal of these military leases on Oahu. I believe the environmental impact of these leases is too great to warrant the renewal and that the impact of noise pollution is too gravely underestimated. I am also concerned about the lack of transparency of the military's activities on this land, and there is many reports that cultural access to these lands has been restricted because of military activity. Thank you.</p>	Please see General Response.
Ginger Kwan		<p>I am strongly opposed to the retention of leased Hawaiian lands by the US Army and gravely concerned that the Draft EIS only proposes three scenarios, all of which involve the retention of ceded Hawaiian lands. Time and time again, the US military has proven themselves to be unfit tenants of Hawaiian lands. Some examples</p>	

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		<p>of the unacceptable actions that have occurred during the military's time on the Hawaiian islands include the recurring fuel leaks at Red Hill, the toxic contamination, including harmful levels of depleted uranium, in the Pohakuloa Training Area and Bradshaw Army Airfield which are home to a number of endangered species, and the decimation of Kaho’olawe, including its water table, due to repeated bombing. These examples are by no means a comprehensive record of the many pains inflicted upon the land, sea, animals, and peoples of Hawai’i during the US military's nearly 60-year occupation via its leases. I support the sentiment expressed by the majority of the attendants at the public meetings held on O’ahu from July 9-11, 2024 – it is unacceptable for the US Army to continue to remain at Kahuku Training Area, Makua Military Reservation, and Kawaihoa-Poamoho Training Area. Rather than strategizing how to retain these lands, the US Army should begin to consider how it will address the restoration of these ceded lands so that they can be returned to the rightful land stewards - the Kanaka Maoli people. Lastly, the US Army should consider whether or not its actions are in compliance with the Army National Guard's military duty of establishing a military government in accordance with the Law of Armed Conflict—international humanitarian law, U.S. Department of Defense Directive 5100.01, and Army Regulations—FM 27-5 and FM 27-10. More information about this obligation can be found in the letter from the Head of the Royal Commission of Inquiry dated August 6, 2024 available as the attached PDF as well as at this link as <a href="https://hawaiiankingdom.org/pdf/RCI_Ltr_to_Army_Commanders_(8.6.24).pdf">https://hawaiiankingdom.org/pdf/RCI_Ltr_to_Army_Commanders_(8.6.24).pdf</a></p>	
natalie kwon		no leasing in stolen Hawaiian lands	Please see General Response.
Julia LaFond		I oppose the proposed land retention for two reasons: because the land rightfully belongs to indigenous Hawaiians, and because the US military's presence on the islands has been environmentally damaging (though I realize not all the incidents were specifically related to the Army, I find it likely that Army training exercises could	Please see General Response.

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		endanger local wildlife, disrupt ecosystems, or compromise water quality in the middle of a water crisis).	
Al Lagunero		Military land use projected over a long term or not affects the socio-economic status of this State, not only O'ahu. This limited purview is not satisfactory to citizens of interfacing Island communities. Request updates affecting the state. Maui County's tri-isle domain is surely affected.	Please see General Response.
Richard Lanford		Aloha, everybody. My name is Richard Landford. Born and raised out here. People that are born and raised out here pretty much know me. I grew up on the streets. . . . . Being a child of the '40s, and then living through the '50s and '60s, unfortunately, my dad, my granddad, they all was military. All my uncles when they meet for inu on the weekend they all military. So, you know, we have to understand and accept the military. A lot of my uncles, my dad even, worked at the NAD because that was a place that they could get jobs and stuff. . . . . But all my experiences growing up here on the coast for the last 77 years if you ask me about the military, they have given us nothing. They have given us absolutely nothing, whether they're with the -- whether with the Navy or whether with the Army. . . . . I -- I can see, you know, projects that was done in foreign counties where the Army would go and help build roads and stuff like that. Whenever we have -- we -- we have -- anything that we need help with out here, the Army don't do nothing. The Navy don't do nothing. So they're just here to occupy our -- occupy our land. . . . . They're just here to take advantage of any so-called conflicts with other countries which shorten their airtime, water time, or ocean time to get to the -- to get to the war. And, you know, they put us, they put us on the target list. They put us in between them and the -- and the -- and the war or the enemies, and we the ones that are going to suffer. . . . . So, you know, I don't believe military should be here. I believe they should be gone. They should have been gone a long time. . . . . Growing up we, when we graduated from Waianae High School, from high school, automatically our Social Security told us that we had to go to Vietnam. We had no choice. We had no choice whether we	Please see General Response.

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		<p>wanted, or we didn't. The minute that Social Security card came if you were 1A, you was gone. . . . So I have no happy feelings or great feelings for the military. I believe that they should be gone, and they should be gone yesterday, not today. Thank you.</p>	
Kalena Lanuza	Mana Mental Health	<p>My name is Dr. Kalena Lanuza. I am a doctor of nursing practice at a psychiatric mental health nurse practitioner caring for mothers across the pae 'āina and for other Native Hawaiians in the diaspora. In my clinical practice I routinely help Native Hawaiians struggling with trauma and the subsequent mood &amp; anxiety disorders that it causes. In almost every clinical encounter that I have with a Native Hawaiian mother, the displacement from land and the continued effects of the military's presence in Hawai'i comes into play. Having to constantly live in a militarized state with helicopters flying overhead, bombing and the pompous attitude that active military can sometimes have toward the host culture causes continuous fear in many of my patients. The historical trauma that the military has &amp; continues to cause cannot be overstated. Not only should the military cease to be active on unceded, stolen land BUT they should definitely not be given license to lease land in the future. Again, the enormous amount of trauma that the military causes Native Hawaiian should be acknowledged and all actions that aim to rectify &amp; heal this trauma should be explored. Programs/projects that help to continue this trauma should be promptly dismantled--namely, renewing the U.S. military's imprint on these lands &amp; people.</p>	Please see General Response.
Leilehua Lanzilotti		<p>I would like to submit the following written testimony in opposition to the Army lease retention of O’ahu lands: Recent events—such as the fuel leaks at Red Hill and the diesel spill in Haleakalā—have underlined the army's ongoing negligence and disregard for our communities and lands. The continued lack of transparency and delay in cleaning up environmental disasters such as these only reinforces that the U.S. Army is not a not good steward, and that leases should not be renewed. Me ka pono, Dr. Leilehua Lanzilotti</p>	Please see General Response.
Leilehua Lanzilotti		Land back.	Please see General Response.

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Inez Larson		<p>Yes. Aloha. I was over there wondering why they sent you and how -- what you did, brah, like if you volunteered to sit here in front of us, but, you know a story for your grands that you -- you did. . . .</p> <p>I'm also a lineal descendant. I'm Haumana. My name is Inez. I'm a long-term -- long-time resident of Waianae. I'm a resident of Oahu. I am a Hawaiian studies major. I hold a bachelor's degree in Hawaiian studies, and what you're looking at is exhaustion, after studying for six years. . . . And I have so many stories at 47 years old of Waianae. You know, we are the people of the sharks. We are related to the sharks, and I know all of my stories and my night marchers and from the tutu from Honokai Hale and Waianae and all of these mo'olelo, these stories. And then I go to college, and I have them reinforced and confirmed that I'm -- I'm just a collector of stories, made it into Makua and -- and saw the beauty of Makua, you know. . . . And -- and what I -- what I am so exhausted from is not having my answers. So I'll go to my -- my professors at Hawai'inuiakea . . . . . and say, so the military did this. They're occupying Makua to keep us from kukaniloko, from the birthing stones, and they don't want us to go into Wahiawa and be able to walk over the mountain to reach our sacred areas because these are chiefly places that the Konohiki need us to access, you know, and -- and there's no answer. . . .</p> <p>When will you guys tell us, yes, that's right, we did this to you? Yes, we're sorry. We did block your way, and we're going to sit here and ho'oponopono and make things right, because I am ready for a peace treaty with you guys. I'm ready to sit and be friends. I'm sorry that you have to sit there and take all that mana tonight, and hopefully you walk away with something good, the love that we have for the aina, and we have for each other. . . . We know we're under occupation and under armed conflict, and we just -- I just stand against, you know, the renewing of, naturally, of Army leases. . . . I was taught in college that the military occupied Hawaii in order to protect the west coast. They will never let it go. But I just want you to know that that is not true. I am being pushed out of the university at Hawai'inuiakea. . . . and there are -- there's</p>	Please see General Response.

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		<p>an army behind me coming out of immersion schools.· Those young Hawaiians are coming up, and the day will come, maybe not while I'm alive.· I think I've already accepted that I will probably be dead, but my grandchildren will see Hawaii free.· Yep.· Mahalo.</p>	
LELAINE Lau		<p>I am not under illusions that the military is doing anything other than "listening".                      I don't think any of what we say will matter.                      I write this letter of opposition for the historical record.                      Your own DEIS, as Aila says, is pre-decisional, evidencing that you have not (or will not) even consider leaving altogether. It's so presumptuous and entitled.                      The leases at \$1/year for STOLEN LAND are a grievous insult. It doesn't even take critical thinking to understand how egregious and blatantly exploitative this is. And you know it.                      Bombing and polluting those lands are further insult and injury. Not ever cleaning up your mess, despite promises to do so, a la Kaho'olawe and Red Hill, is negligence.                      Preventing cultural access is unconscionable. You are in someone else's home, not that that's ever stopped you from being a rude guest.                      Having your community liaison say you're looking for "better cooperation" tells us everything we need to know. You are coming at this with the foregone conclusion that you are going to continue as you have been. As if this is just a blip in your timeline. An inconvenience. Oh, we have to do some performative listening to the natives again. AMIRITE?                      The fix is already in.                      When have you ever cared about the communities you are sited in? In fact, creating Superfund sites is what you do best.                      Ah, but has America ever stood for true liberty and freedom for all? It was founded, after all, on more stolen land, and off the backs of slaves. America has been showing us their true colors all along. So, given the historical and empirical documentation of these horrors against Black and Brown people, and the experiential knowledge of your time here, why should anyone here believe anything you say?</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>You'll hear a lot of nos, but you will keep coming back, testing the patience of the Kanaka OIwi.</p> <p>In repeatedly not accepting the NO, the military is no different from the man who will rape a woman despite the no, or murder her when she declines a date or when she finally leaves his abusing self. All this while subjecting Hawai'i's women, especially the Kanaka Maoli among them, to sexual exploitation and abuse. The military is TOXIC.</p> <p>That's who the military is - a serial abuser. Worldwide.</p> <p>We say NO TO US IMPERIALISM!</p> <p>We say NO TO OCCUPATION!</p> <p>We say NO TO MILITARIZATION!</p> <p>WE SAY A'OLE!</p> <p>ENOUGH IS ENOUGH!!</p> <p>We know you are used to getting everything you want, hell, congress sometimes gives you more than you even ask for! While Kanaka Maoli go houseless in their ancestral homeland. We know you don't care about the people or the land anywhere you go. Your track record both precedes and follows you. Everywhere.</p> <p>Now kindly clean up your mess and get the fuck out.</p>	
Claire Laurentine		<p>Hello,</p> <p>My comment is to demand the US Army NOT renew the US Army lease and give this land back to who it belongs to - Native Hawaiians and Pacific Islanders. This is Native Hawaiian land. The 6,322 acres of land was stolen by the US Army and MUST be returned to Native Hawaiians and Pacific Islanders. The presence of the military on Hawaiian lands has caused extensive environmental damage to natural resources and water. The Army is not protecting the land, it is harming it. As the army facilities are on land where many endangered and threatened organisms live, it must be PROTECTED by Native Hawaiians and Pacific Islanders. The US Military consumes more fossil fuels and energy than most countries and is the biggest greenhouse gas emitter - if we are trying to stop climate change, why would you think to continue these leases on stolen land? The Army has been responsible for the destruction and desecration of</p>	Please see General Response.

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		<p>numerous Hawaiian burials, cultural sites, and natural landscapes. This is HORRIBLE and UNFORGIVABLE. This land must be given back to Native Hawaiians and Pacific Islanders. END THE LEASE - LAND BACK!</p> <p>Thank you for reading.</p> <p>-C</p>	
Kawena Lauriano		<p>Aloha, I am writing today in opposition to the U.S. Army's proposal to retain 6,322 acres of land in Hawai'i. Most Hawai'i residents have seen the negative environmental impacts of the U.S. military's "training" and operations on our lands, including permanent poisoning of "training" grounds and the Red Hill fuel leaks. The U.S. Army should clean up all toxins from the land and return it the State for the use by the people of Hawai'i.</p>	Please see General Response.
Keonilei Lealiifano		<p>I strongly oppose the ATR here in Oahu! I strongly oppose the continue land use in Makua, kawailoa and kabuki by the U.S. military. The environmental damage is horrific already! Our communities' health and wellbeing has been deteriorated and detrimentally affected by their land possession and use of these lands for training. In addition, the army and other branches of the U.S. military have set a precedent of deceit and withholding of important information in relation to their harmful environmental impact, and have not been responsible with follow-up action, reparations etc. even when court mandated. They are a dangerous entity to continue to be a part of our precious island ecosystem. They need to go!</p>	Please see General Response.
Bob Leinau		<p>Aloha. Ahiahi kakou. My name is Bob -- -- Leinau, and I've been going to meetings for over 50 years out here on the north shore. And some of the best testimony I've ever heard was tonight. There's a lot of thoughtfulness and articulate people in this crowd, and it's really impressive. I'm here to talk about an if, if this negotiation goes to a negotiating table, and if the dollar-a-year thing kind of, like, probably isn't going to be talked about for very long, I'm going to suggest in your poster in the back, it says that transportation is one of the issues that you address. I live in Pupukea and have for over 50 years. And there's -- <u>if there's an</u></p>	Section 3.13.5.1 has been updated to explain that Drum Road is used and maintained by the Army under a separate roadway easement and is not part of the KTA lease for Tract A-3. The Army would continue to maintain Drum Road separate from the Proposed Action. The Army will continue to coordinate its use of H-2 and HI-99/ Kamehameha Highway with HDOT to access KTA and Schofield Barracks.



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		<p><u>incident or an accident or a rock slide, there's thousands of people up there now, and they want to know how they're going to get out of there. And the only answer is Drum Road. In the '30s, the military got a perpetual easement for the use of Drum Road to act -- to come from Helemano to the Kahuku Training Area. It crosses several private properties. And in the '30s, they did an improvement. In every 10 or 15 or -- years or so, they would go in, and they would improve that road again to keep it safe. There are a lot of roads back there that were made during World War II that are, like, you know, 8 foot deep gullies now. Anyway, there's a need to get into the back acreage. Drum -- General Drum put that in for a good reason. If the coast highway goes out, you're not going to have any access laterally around the island. There's accesses up Kawaiiloa, Ashley, Pupukea, and Waimea, and, of course, down here at Kahuku. Logistically, it would be good. It was good then, and it would be good to have that now. I hope you can put this on the table if you decide that that's one of the things that the army needs to do to renew your lease. There would be a lot of community benefit involved, including not just the community, but the army, also. And, you know, when the striker brigade was in there, they spent millions and millions and millions of dollars putting that in. And then the strikers went away, and then the contractor went away. and the road fell apart. Anyway, it's an ongoing process, and right now, it's not safe. If somebody's up there on a rainy day, the chances of their going over the edge of a cliff and ending up dead at the bottom of one of the gullies or the valleys is very high. And you guys get your finger in the pie up there. You folks have maintained it for a really long time. and I hope you can continue to do so if you get the lease renewed. Thank you.</u></p>	
Roberts Leinau		<p>June 23,2024                      To whom it may concern:                      Regarding the lands leased by the Army:                      Many people feel that the price paid for the lease agreement is not a fair return on the amount of land that is leased.                      Many people feel that in addition to the amount of money paid</p>	<p>The EIS has been revised in Sections 2.3.4, 3.1.3, and 3.2, and Appendix G to clarify the assumption that a new lease or fee simple title would be negotiated at no less than an equitable, fair market value with the State. Land retention negotiations, including compensation for use of</p>

Commenter	Submitted By	Comment	Response
		<p>there should be clear contractual stipulations as to what other benefits, BMP, policies and procedures should inure to the land and relevant associated properties in question with specific timed schedules.</p> <p>By way of comparison a natural question that comes up is who would take better care of the land going forward ... the Army or the State of Hawaii. The EIS should provide [as much as possible a budgetary comparison of what the State spends verses what the Army spends on similar parcels of land for example: security, care for flora and fauna, cultural assets, infrastructure including the roads, BMP maintenance related to fire protection including emergency response accesses and roadside clearing.</p> <p>Respectfully submitted,                      Bob Leinau</p>	<p>the State-owned land, would be initiated following completion of the NEPA/HEPA process.</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.</p> <p>Future lease conditions text in the Executive Summary, Chapter 2, and Appendix G has been revised to note that future lease conditions:</p> <ul style="list-style-type: none"> <li>* Would be similar to the current lease.</li> <li>* May include references to Federal and State regulations in existence at the time of a new lease.</li> <li>* May be revised or added by the State in a new lease, but that the EIS cannot precisely analyze potential impacts because those lease conditions are unknown.</li> </ul>
Roberts Leinau		<p><u>Of particular interest is the concern to many people that live in Pupukea is the availability of an emergency exit should Pupukea Road access/exit become impassable for any number of reasons.</u></p> <p>Many think that Drum Road is part of the answer for an alternative emergency route. I feel the full history of the Drum Road access/trail between Helemano, Kahuku Training Area and the adjoining lands that Drum Road currently passes thru [as far back as can be documented including Territorial and State historical records] should be part of the EIS document. The Army built Drum Road in the 1930's as a strategic Coastal Defense consideration. The road currently crosses several property owners land and the Army has a perpetual easement/right of way to use this road. Periodically over the years the Army has scheduled major repairs to this road to make it safer for military training. The history of these repair and maintenance safety projects should be part of the EIS history of this</p>	<p>Drum Road is used and maintained by the Army under a separate roadway easement and is not on State-owned land or part of the KTA lease. The Army would continue to maintain Drum Road separate from the Proposed Action. As such, Drum Road maintenance is beyond the scope of the EIS. The Army would continue to coordinate use of H-2 and HI-99/Kamehameha Highway with HDOT to access KTA and Schofield Barracks.</p>

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		<p>road. I feel that a commitment from the Army to bring Drum Road up to a standard that is safe enough to use as an emergency escape route for the general public [even if it is a one-way road] would be a good thing to put on the lease renewal negotiating table. There is good potential for a win, win, win. With the current awareness of climate change and increased sensitivity to fire risk if the Army takes the lead on Drum Road improvements/differed maintenance/increased safety there might be support from other sectors of the Federal, State, and County governments, NGO's, property owners, and others ... more win, win, win. The EIS should <u>explore some of these Drum Road alternatives</u> to help facilitate the terms of a new lease from the State at the Kahuku Training facility and one of its few accesses.</p>	
Laakapuakawailani Lenchanko	OHANA LUALUALEI AKEA ALLIANCE (OLAA)	<p>Ohana Lualualei Akea Alliance (OLAA) concurs with U.S. Army assessment of increased cultural impact on aina their retention of training leases on Oahu especially at Makua promulgates. OLAA is opposed to a new lease at Makua Oahu. The contiguous moku from Pohakea, Lualualei to Kaena, Keawalua is steeped in evidential traditions, customs and practices including iwi of ancestral diaspora.</p>	Please see General Response.
Thomas Joseph Lenchanko		<p>July 11, 2024 Steven B. McGunegle Colonel USAG-Hawaii Rachel D. Sullivan Colonel USAG-Hawaii David M. Crowley Cultural Resources Manager DPW Environmental Laura L. Gilda Archaeologist DPW Environmental Regarding: Kingdom of Hawaii --- return of crown and government land to the rightful heirs, successors and descendants; 2029 return of all questionable DoD lease / fee simple property of the Kingdom of Hawaii, Oahu island... aloha no na kau A pauole ke kuamoo o na kupuna ma THIRD NOTICE: aha ula kukaniloko OBJECTION: to the land tenure retention Draft EIS - applicable [4] the no action alternative, under which all leases would lapse, and the Army would lose access to all land in question; OBJECTION: to the DoD unlawful trespass, intentional damages, imminent harm and irreparable injury upon relative traditional cultural property within and without kalana lihue wahiawa halemano waianae uka, 36,000 acres puuhonua kukaniloko.</p>	Please see General Response.

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		<p>Specifically, but not limited to, the crown and government land of waianae uka lihue wahiawa halemano, kaananiau maunauna, kaananiau oahunui, kaananiau halemano, kaananiau oio, haleauau heiau complex, wahi huna kele - family burials, halahape, puu aumakua, puu pau ao and all other DoD impacts to relative traditional cultural property of the Kingdom of Hawaii, Oahu island... pili i kuapuiwi Thomas Joseph Lenchanko kukaawe Kingdom of Hawaii, Protected Person, Hawaiian National and Private Citizen</p>	
Luwella Leonardi		<p>Aloha. I am my father's daughter. His name is Kanaka’o’o Ni’aupi’o . My dad was born -- born at -- his address is [REDACTED]. He also passed away at this property. One of the things that my dad experienced was martial law. Military -- he came home one day and the military was on the property, and he stood there. He was, of course, angry. Why was he angry? He was angry because the police -- because the military had parked their trucks on top of his parents' graves, so that what made him mad. The military was trying to get my father off the property, and he was trying to get the trucks off his parents' graves. So what the military did was hold a gun to his head and said: If you don't leave, we will shoot you. My dad also passed away at [REDACTED]. And towards the end of his life, he kind of, like, joked around about it. [...] But the reason why I came here tonight, people. I met a beautiful, beautiful woman last night, and she talked about she was -- how her husband was in the military. So the reason why I came here tonight, so was my husband. He was the -- the My Lai massacre was in March, and May 13, 1968, was a call up. I myself gave birth at Tripler army hospital on May 26th of 1968. So I just want to say that I'm here tonight because this is Kahuku. And the reason why I'm here, I wanted to acknowledge, like I did last night, a beautiful queen from Kahuku. Her name is Irene Primacio. This woman here lived right across the street there. Her husband went to Vietnam, and so did Pacoba. Her husband came home, but Pacoba did not come home alive. I just want to say, I was here when Irene lost her -- her baby, her 10th baby, at her house. And I just want to say to all of you, Irene was such a strong, wonderful woman. She was a queen back</p>	Please see General Response.

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		<p>then, and she kept all of us alive, all of us. I was just 19 years old on May 26th. What I want to say tonight is Irene Primacio had -- was so angry at all of this Vietnam war. Remember, 2 million people passed away -- -- in Vietnam. Irene, we -- the army called us wives over to Schofield, and so we went to the gym on Schofield. And Irene stood up and screamed and yelled at Inouye. Yes, Inouye was there. He was there because our husbands were full 42nd, and we were not getting any -- well, I wasn't getting any -- getting any checks, although our husbands was employed and being trained to go to Vietnam. Because of Irene, I was able to find the strength to bring my husband then home. He was in Vietnam, and Congress had passed this rule that if you were in college, you can come home on an early out. Well, thank God my husband was in college here at Church College. So I was able to get him home three months after he left for Vietnam. My husband did come home then with shrapnel all alongside here. Thanks to Irene Primacio, many of us are doing well. Many of us, our children are okay. We are hurting. But thanks to Irene Primacio and her strength here, right across the street here, she was able to hold all of us together. And there was a lot of wives out here whose husbands were in Vietnam. So that is why I'm here tonight. I wanted to acknowledge Irene Primacio. She was the queen that -- and she still is a queen today. There's a lot that I want to say. One of the things I really want to say here, sir, is not only do I love Hugh Thompson, Jr., but John Kerry, too. I forgot his last name last night. John Kerry was the one that flew over. He made it to Solomon Islands to stop Linda Lingo from selling Hawaii to Indonesia, but he didn't make it in time. So I believe this is what's going to happen tonight. Those three places are going to be land into the hands the Indonesians. And I also want to say -- well, there's a lot that I want to say here. [...] So I just want to say thank you to all of you for coming here tonight. And this is really rough, I know. And a lot of us do have a lot of past relationships with the military that completely hurt us forever and ever and ever. So just coming here is a healing process. And again, I just want to acknowledge Irene Primacio. Thank you.</p>	

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		<p>So -- but tonight, the reason why I'm here tonight is because not only do I want to acknowledge certain areas -- which is <u>Kahana, Punalu'u</u>, and of course, <u>Kahuku -- it's loaded with depleted uranium</u>. It is written, I have attended an army meetings on this issue. <u>Deplete uranium is really important to understand what is it and how it does harm an adverse effect on our people.</u></p>	<p>As stated in Section 3.6.5.1, there is no evidence that any weapons systems using depleted uranium have ever been fired at KTA. Therefore, depleted uranium is not discussed as a health and safety concern on or near the State-owned land at KTA.</p>
		<p>I think I'm going to -- So the adverse here is a lot. It's huge. The adverse here is a lot. These three properties needs to go back to the inventory, if not to the public trust inventory, if not, then you will -- the state will be in breach of trust. Then it can decide. The state has to decide what they're going to do. So when your lease is over, 2029, that three properties needs to go back into public trust inventory. And I'm thinking not that this is what's going to happen. What I'm thinking is going to belong to Indonesia. It's called IndoPacific.</p>	<p>Section 3.2.4.1 of the EIS discusses public trust lands.</p>
Luwella Leonardi		<p>My name is Luwella Leonardi. I live on Hawaiian homestead. I also grew up on Hawaiian homestead in Waimanalo. I am now presently living in Waianae Valley on homestead. The first thing I want to talk about is my grandfather, Orlando Auld. Back in 1951, he was on Anoita (phonetic). He called home to my grandmother, and was very, very angry. What he was angry about is he was witnessing some of the 64 nuclear bombs that was being done there. So he called home to my grandmother, and he asked my grandmother if anybody was pregnant. And my -- my -- my grandma said, "Yes. Two." And he -- he asked my grandmother to name two children: one, "Marshall," which is my brother; and the other one "Kwajalein," so that we never, ever forget about nuclear war. The second thing that I want to talk about is I want to bring up George Helm. I want to bring him up because when he passed, when we lost him, it was 1976, I believe. And for two -- two years thereafter, we -- we -- those of us who were concerned at that time about George Helm, we finally made it to Kaho'olawe on Public Law 95-341. And that was freedom of religion for Alaska natives, Native Hawaiians, and Native Americans. So here I am. I'm walking across - - sorry. I saw the 30 seconds. I'm walking across -- going to -- going</p>	<p>Please see General Response.</p>

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		<p>to Kaho'olawe. We landed at Honokanai'a . We also took a trip to Kealahiki from Honokanai'a. And we walked -- there was just five of us -- walked across Kaho'olawe. We also made it to the middle part of Kaho'olawe, to -- to Pu'u Ma'ili. After Pu'u Ma'ili, we all went to Hakioawa. I turned around and walked back to Honokanai'a, into the arms of Uncle Harold Mitchell -- Uncle Mitchell. What I wanted to say here is -- actually, there's a lot that I want to say. There's -- [THE MODERATOR: Can you summarize, please?] I like the name Pau. It's really good. Thank you.</p>	
Luwella Leonardi		<p>Aloha everyone. I have a whole list of things here that I wanted to talk about tonight, but I'm going to put it aside, and I'm going to acknowledge this very beautiful woman that came in and spoke about her life. And the reason why I'm doing this is because I was there. Not where you were, but before, okay? . . . . My Lai massacre started in March of 1968. May 13th, 1968, a lot of our husbands was activated. A lot of us wives would go to the airport, and we'd say goodbye to our husbands, and a lot of the wives would return to the airport and see their husbands coming home in a box. So that was my life back then. That was our life back then as a wife. . . . So I want to say thank you so much for sharing your experience. Okay. I want you to know all of us are divorced, so make your life happy. Yes. Make your life happy. You can. Yes. Yes. . . . And the other thing that I would like to acknowledge you, which was shocking, is Indonesia. So Linda sold Hawaii for \$35 million to Indonesia. This is Waianae, people. This is Waianae. What does Indonesia got to do with Waianae? Let me tell you, a lot. Okay. . . . By the way, I just want to acknowledge that Thaddus Davis here was here three times, three meetings from the Pentagon. I have a docket. I've been to court with Thaddus Davis, so I just want to -- that's what I was going to talk about tonight. . . . But I want to continue on and talk about Linda. What happened here is John -- shucks, senior moment here. He tried to -- he tried to stop her from selling. Okay. Everybody know here we had FestPAC, right? Okay. Maluku is a nation that was not acknowledged, it was not on the -- on the list, but guess what?</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>They were here. The question that they questioned me about was Indonesia. I went what? Because they have their lives is just tormented by Indonesia. So I said, you know what, you like to learn about Indonesia, come out to Waianae. I'll show you where Indonesia is. Okay. Indonesia is in Nanakuli. How did -- what are they doing in Nanakouli? Hawaii architect. I took the Maluku women to the graveyard. I said this is Nankouli graveyard and Hawaii architect use the drones. What did they use the drones for? They used the drones so that they can own the graves, they could own the genealogy. That's what they did in Nanakouli. And then I took them to my Hawaiian homestead. No. I took them my Hawaiian homestead up here in Waianae Valley and I told them look at the -- look at the sign here, it says G70. Indonesia. Okay? You see those posters there taking down? G70 is on the poster, so what do you think is going to happen to Waianae or Makua? What do you think is going to happen to us? . . . . How about Chaminade, University of Hawaii? How are they connected to Schmanod University of Hawaii? We need to look deeper, and I don't know how to do that. I was talking to someone out there and what they told me is I know a lot and all this stuff that I do, but I need to bring it down so that all of you understand what I'm talking about. . . . People, you need to rise, okay? Tonight we need to rise, and we need to take a look at what this beautiful woman said tonight. . . . So, again, I have a whole list of things that I wanted to talk about that, especially about Thaddus Davis and being in court with him. Thaddus Davis from Pentagon. I have a docket. I was in court with him with Judge Berretta and Judge Kennedy, Atomic Energy. . . . So I didn't do too well because we are all downwinders and that is the case. I -- I -- I don't know how to bring it down to your -- to bring it down so that you can all understand me. The only time the Schofield bomb on the other side -- -- is when the wind is blowing this way, okay? Is when the wind is blowing this way and they do it a lot, all night long. . . . The other thing too, here, is Thaddus Davis did a buffer zone, a 3-mile buffer zone from Kolekole Pass. I don't know how to get you to understand that Maili has the highest</p>	



Commenter	Submitted By	Comment	Response
		<p>rate of cancer among our children. I don't know how. I don't know how to bring the details forward. . . . So what you're all doing here tonight, you need to rethink about that buffer zone that Thaddus Davis did while he was here. It gives them the right to bomb. We are downwinders and it needs to stop. . . . Secondly, 900 tons of nuclear debris ---- from -- from different -- from different -- in 2009 and 2010 he's writing 900 tons was trucked over to Makua. What they did with that 900,000 people they made two fire lanes because that meets the NRC. They made two fire lanes from Makua to Makai so all the 900 tons debris is underneath the fire lane and that meets the NRC rules. . . . So, again, what Thaddus Davis was doing here is they cleaned up -- they cleaned up 253 acres of the -- of the bombs that was -- that was dumped after World War II off our shorelines. Only 253 acres they cleaned up and now they're -- they're clean. There's thousands of bombs out there on our shoreline. Depleting uranium is up on Maili shorelines. Depleted uranium where our children swim is all up along the shoreline of Mo'ili and it's -- it's documented and researched. It's there, in fact, on record. Okay. So I'm going to stop here. There's more to say. I just want you to know there's more of -- thank you, again, for sharing because I -- I -- I was like taken by what you had said. I just want to back you up on the evidence, 35 yeah. So -- Thank you, all.</p>	
Eri Leong		<p>Aloha mai kakou,          The US military has absolutely no business desecrating the aina of Hawai'i any longer than they already have. If they have any form of honor or integrity, they would understand they have no business occupying the island and the Pacific.          Being of indigenous Ryukyuan heritage, I stand in solidarity with the kanaka oiwi who call for an exit of the US military and an end to foreign occupation of the Kingdom of Hawai'i.          Mahalo nui loa,          Eri Leong</p>	Please see General Response.
Troy Levinson		The retention plan for the training areas currently utilized by DOD on Oahu, falls woefully short. The DOD has left a tragic impact on	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>Hawaii, and specifically Oahu for previous decades. The actions of the military have contributed to the degradation of priceless environmental resources, cultural resources, the ability of local people to afford to live in Hawaii... All while spending very little money to compensate the state or community for the land that they use.</p>	
Troy Levinson		<p>I have been privileged enough to visit all of the aforementioned military leased areas on Oahu. It is very clear to anyone that has spent any time on these ranges that they are neglected, full of UXO, marginally used, and completely restricted to the community who would benefit with access to these lands. The military has <u>introduced a multitude of invasive plant species to these ranges</u>, which have now spread over the entire island. The military has zero plan or capability to address the environmental issues that they have caused. The island of Oahu will forever have to deal with the impacts to agriculture and watershed degradation due to all of the introductions, and as long as the military is able to "train", they could care less about actually addressing the problems they have caused.</p>	<p>The Army works diligently to minimize the spread of and to control invasives species. These efforts are generally described in Section 3.3.5, and for respective training areas in Sections 3.3.5.1, 3.3.5.2, and 3.3.5.3. Stewardship of the land entrusted to the Army is part of its mission, and that stewardship is taken very seriously.</p> <p>Please see Sections 3.3, 3.4, 3.6, and 3.10 of the EIS for analysis of biological resources, cultural resources, hazardous substances (including unexploded ordnance), and water resources impacts, respectively.</p>
Troy Levinson		<p>The fact that the military continues to attempt to lease these lands for literal pennies... is incredible! If they were serious about actually building a relationship to the communities in Hawaii, the DOD would at <u>least make an effort to lease the lands at market value</u>. That way the state could actually work to address the environmental issues that will impact the island in perpetuity, regardless of if the military packs up and leaves at anytime.</p>	<p>The Army does not believe that the land can be leased for the same consideration it offered in 1964. The EIS has been revised in Sections 2.3.4, 3.1.3, 3.2 and Appendix G to clarify the assumption that a new lease or fee simple title would be negotiated at no less than 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> <p>Future lease conditions text in the Executive Summary, Chapter 2, and Appendix G has been revised to note that future lease conditions:</p> <ul style="list-style-type: none"> <li>* Would be similar to the current lease.</li> <li>* May include references to Federal and State</li> </ul>

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			<p>regulations in existence at the time of a new lease.</p> <p>* May be revised or added by the State in a new lease, but that the EIS cannot precisely analyze potential impacts because those lease conditions are unknown.</p>
Troy Levinson		<p>The unfortunate reality is that the military's actions here in Hawaii show exactly where the priorities are. At every step, public comment is dismissed, ignored, and skewed, in an effort to green-wash the military's continued degradation of Hawaii. The reality is that the EIS builds upon over 60 years of history that should have never been allowed to happen to begin with. Throughout the EIS the statement "no new impacts" is thrown around regarding nearly every point of contest. The people of Hawaii are sick of the "Old impacts" from military leasing, and this misleading language doesn't fool anyone. All of the residents of Oahu have to LIVE with the impacts (Old and New) of the military actions. It is easy for the DOD/Military to continue with the business-as-usual mindset, because they are transients here in Hawaii. Ultimately once this island serves no point to you, the DOD and military will pack up and head to the next island where they will repeat the same degradation and actions that they have here on Oahu.</p>	Please see General Response.
Troy Levinson		<p>Unfortunately, those that will feel the impacts of the continued leasing of these ranges are the natural resources of Hawaii, that are impacted regardless of their presence directly on the ranges. <u>All invasive plants that have been brought to Oahu have rapidly spread off of military leased lands</u> and are now wreaking havoc on critical habitat across the island.</p>	<p>The Army works diligently to minimize the spread of and to control invasives species. These efforts are generally described in Section 3.3.5, and for respective training areas in Sections 3.3.5.1, 3.3.5.2, and 3.3.5.3.</p>
Troy Levinson		<p>At this point, the best thing the military could do for everyone, is to minimize their retention to the greatest possible extent. The military's use of Hawaii is an extremely polarizing issue, not only in Hawaii, but across the region and the world. The continued degradation of these important areas, especially right in front of the resident's faces, should stop. I hope that the DOD and Army</p>	Please see General Response.

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		considers the future generations who will have to live with the consequences of this lease for the next centuries	
Noelle Lindenmann		The army and military need to not have their leases renewed. It is time for the army to clean up the damage they've done to Oahu. This EIS is lacking a full view of the entire land area. Military presence has caused environmental damage and threatens water on Oahu. The impact to endangered plants and animals cannot be overstated. Thank you. Noelle Lindenmann, resident of Kailua-Kona	Please see General Response.
Renie Lindley		Dear Sirs; The lands are sacred, they are watershed mountains and valleys and need to be reserved forever. Let nature bring them whole again. Military training on these lands does the opposite; it destroys and in addition trains to destroy people through war.	Please see General Response.
Ekini Lindsey		Aloha kakou. Aloha, Steve. My name is Ekini Lindsey, and I am from Waimea, Moku o keawe. I was just acres away born near Pohakuloa; however, I am in support of Makua. . . . . I would like to bring in my kupuna as well as Queen Lili'uokalani and to echo again in 1893 after Queen Lili'uokalani was deposed, hundreds of armed American soldiers and Marine landed on Oahu to support of a new government. Equipped and ready to fire and kill our kupuna who were armed with prayers, scriptures, himeni, church hymns, tea leaf, and paakai. That's what our kupuna was armed with against your guns and transmissions. . . . . Upon research, your very own Honolulu resident, retired colonel served in the Army Reserves for nearly three decades. Her name is Ann Wright. She quotes in an interview with the Hawaii Public Radio on August 20th, 2021, in a snicker manner she quoted, "The military's actions, do not demonstrate a great concern for local communities, their culture, and their history. The U.S. Military generally wants as much as it can get whether it be weapons, or land, or whatever. They don't care at all about our cultural interests." . . . . Colonel Wright is well aware of national security concerns; however, despite of the military occupied lands through military and the history, she	Please see General Response.

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		<p>chuckles, "The dollar a year lease and what happened 75 years ago with World War II, today the military needs to make rational and diplomatic decisions. Especially pertaining towards a multitude of concerns," for us here, the Kanaka, the people of Hawaii. . . . . She emphasizes there are already thousands of acres in Kaneohe, thousands of acres in Pearl Harbor, thousands of acres in Schofield. The 30,000 lands are not -- the 30,000 lands are not critical for use, she states. . . . . Enough is enough, Steve. 23,000 acres in Pohakuloa that is used for administration purposes and is clearly far away from active training zone. This can be given back to Kanaka. . . . . There are many, many other stations that qualify -- or not qualify, pardon me, that each Marine base have thousands of administration acres that are used for administration alone. These acres can be given back to Hawaii. . . . . Steve, I hope you are able to accumulate all of our moana here. Think of your grandparents. Think of your great-grandparents. We would not bomb on your grandfather's or grandmother's grave. That is hewa. Think what you are doing to our Makua. All of the history. . . . . With Auntie Lynette proves we traverse up to -- I'm sorry -- to Mokaena. It -- there -- it is a heiau on Makua, and we go and we clean there every month. I don't know if you have been there, Steve, but we would like to take you up there. I would love for you to feel the spirit, to feel the -- the embracement of our heiau, of our history. Would you please come and join us, Steve? Mahalo.</p>	
Yoko Liriano		<p>Aloha kakou. My name is Yoko Liriano, and I am a member of the Hawaii Committee for Human Rights in the Philippines. I was brought to Hawaii in the fourth grade, because my father was in the Navy, stationed in Kaneohe. I grew up in military housing in Salt Lake until my family settled in Kapolei. As a Navy brat, I actually loved military life, not understanding and not even wondering why places we enjoyed were off limits to kanaka and local residents. And I admit, even as a fifth grader in 2001, I was lured and intoxicated by the ultra-American nationalist show of power, watching fighter jets spin above with the rousing music, with the red glare of fireworks burst in the air, giving proof that the flag was still</p>	Please see General Response.

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		<p>there. But despite being raised during the extremely rabid patriotic fervor of the 9/11 period, my eyes could not remain shut to the contradictions of watching U.S. military aggression cloaked in lies about freedom and democracy while living in the actual landscape of a stolen sovereign nation. The U.S. military is not here to protect the people of Hawaii. It's here for its strategic military interests with zero mind to ecological, cultural, or humanitarian damage. We've all heard from Navy Secretary Will Whitewash, who even via parody highlighted the twisted logic and empty promises often used to justify the continued military occupation of these lands. The military loves to boast about creating superfund sites and spreading hazardous waste, but these sites are scars on the aina. And the catastrophe of Red Hill is a stark reminder of the persisting dangers of military occupation. How can you talk about defending freedom when the people here are not free, when their lands are used as geopolitical pawns? Not to even mention all the people around the world who end up as collateral damage for the U.S. agenda, devouring everything in sight. How can the people be free if the actual people of this land do not even have access to their own heritage lands? If you want to protect Hawaii, Secretary Whitewash and all the fake nice military figureheads, then clean up your mess and leave. Listen to the voices of the people who have had enough of their land being desecrated and their waters poisoned. Genuine security comes from clean water, healthy land, and strong communities. In fact, if the U.S. military were not here, Hawaii wouldn't even be a target. The narrative of protection is absolutely false. What the people of Hawaii need is a genuine commitment to the wellbeing of the aina. To be someone who actually cares about Hawaii, you have to wholeheartedly support and contribute to the active struggle of Kanaka Maoli to reclaim and wield their collective power in demand the return of these lands to its rightful stewards. This change will only come from -- our people, power, and grassroots movements. We must unite and take back the land for the people, not for imperialism and war and destruction and by any means necessary. Together, we can evict the military in Hawaii</p>	

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Jennifer Lockheed		<p>and build a future rooted in justice, sovereignty, and aloha aina. Thank you.</p> <p>Howdy doody, all. I am Jennifer Lockheed, heir to the Lockheed empire, and I am just delighted to be here to share with you the tremendous benefits of military presence in Hawaii, especially to my bank account. The US military isn't about protecting freedom and democracy. It's about ensuring the steady flow of cash to defense contractors like my family business, Lockheed Martin. Every time a bomb drops or a jet takes off, we're making money. And, boy, do we love that roaring sound. It's the sound of profits. Cha-ching. Just listening to Navy Secretary Whitewash mention Israel, my other most frequent buyer of weapons of annihilation, and the permanent war agenda, that's music to my ears. Permanent war means permanent profits, just the continuing opportunities to make cash money. My cup overfloweth. Okay. Okay. So I know some of you are upset about the genocide, pollution, destruction of sacred land, irreparable -- irreparably poisoned aquifers, la, la, la. But think of the bigger picture: the wealth and luxury lifestyles of the rich and powerful. Your sacrifices keep the Lockheed, Raytheon, and Boeing empires doing so well and thriving. Did you hear that Lockheed Martin got sued for overcharging the Navy? A \$70 million settlement. I'm not stressing on pennies though. We have billions. Lawsuits are just the cost of doing business. And countering negativity is easy, with deep pockets and influential puppets. We can spin any story to sound like we're the good guys. So let's keep the military right where it is. And thank you, Hawaii, for keeping it so friendly to the military, which is the most healthy sales environment to us. And your poor working class soldiers, who enlisted for the only avenue to for free healthcare and a college education, might be fighting for a living, but we were making a killing. Thank you.</p>	Please see General Response.
Howl Lockwood		<p>Stop testing weapons on Indigenous land. Stop polluting the waters and natural ecological balance with weapons testing every 2 years. Stop the continuation of colonization of Hawai'i                      Be good stewards of the earth</p>	Please see General Response.

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Joy Loo		End all military leases!!! The US military is the biggest polluter of land, water, & air. They poison our water, they bomb our land & they leave their ‘opala there! End all leases!! Demilitarize Hawai‘i! Clean up ALL your mess	Please see General Response.
Joy Loo		As a Hawai‘i Island resident, I see how military occupation of our ‘āina does nothing but cause angst to us. The US military poison’s our land, air, & water. I am firmly against renewing any military leases & demand the clean up of all military occupied lands. De militarize Hawai‘i De occupy Hawai‘i.	Please see General Response.
Steve Loo		The army has done nothing but ravage our lands in a place where there is little land to begin with. They have had these lands at a ridiculous price all these years and have not been stewards of the land. They DO NOT deserve to have these lands at any price. This has never been more true than now when our community struggles with the cost of housing. Time for the army to leave!	Please see General Response.
Kalani Lopes		7/27/24 GIVE ALL BACK, THAT HAS BEEN TAKEN. THIS PILIKEA IS NOT OF HAWAII. MAKE RIGHT AND GIVE BACK TO ITS RIGHTFUL CARETAKERS!! KEAKUA HAS THE LAST SAY!! KALANI LOPES	Please see General Response.
Sheena Lopes		No more military land leases! It is time that we put the health and well-being of our ‘āina and her people as a priority! There is nothing more important than being able to live on an island without the sound of that same island being bombed time and time again! This is NOT how you treat something you respect and it is clear that the Military does not respect Hawaii, her lands, or her people. Please end these leases already and it's time for us to start rehabilitation efforts!	Please see General Response.
Tina Lopez		Aloha, According to what is Pono (right), what I read and am learning to be true. Marshall Law is for when war, and harsh events, Then suppose to be returned to its rightfully owners Hawaii, Maui etc and private	Please see General Response.



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		owners. Stop using Land for your own agenda (Marshall act). We thank you for what you have done this far, BUT TIME TO GIVE BACK WHAT IS NOT YOURS PERIOD! Make right, and give Kanaka Maoli choice to use Land as they see fit for all Kanaka Maoli Mahalo Tina Lopez [REDACTED]	
Victor Loucks		Hawaiian lands belong in Hawaiian hands.	Please see General Response.
Julia Lowe		<p>My grandfather and father served in the Navy and Air Force, collectively they served in WWII, Korean, and Vietnam wars. Their time in the military helped them to provide for their families. I will always be proud of their sacrifice and the sacrifice of my grandmother and mother.</p> <p>That being said, I think the way to move forward would be to find ways to incorporate the Kanaka Maoli and their families by providing housing opportunities and employment on the trust lands (without the requirement of recruitment). Providing opportunities for our people to live and prosper on these lands, and to serve as guardians (kahu) to lead in agriculture, conservation, restoration, and as cultural specialists at each large/mid-sized military installation. I think this would help to alleviate the concern and upset surrounding the history of the military in the islands. It would provide more transparency and perhaps begin to alleviate the serious concerns that the people have.</p> <p>In addition to this, I think it would go a long way if <u>adequate monetary reparations to the Hawaiian people for the years of use of the trust lands would be made</u> - these monies could go into providing financial relief, programs, scholarships, etc. and might prove to the Kanaka Maoli that you are invested in the people of these islands.</p> <p>If you cannot do this it would be best if you clean up, transfer the lands back to the Hawaiians (not the state), and leave.</p>	<p>The EIS has been revised in Sections 2.3.4, 3.1.3, 3.2 and Appendix G to clarify the assumption that a new lease or fee simple title would be negotiated at no less than 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> <p>Future lease conditions text in the Executive Summary, Chapter 2, and Appendix G has been revised to note that future lease conditions:</p> <ul style="list-style-type: none"> <li>* Would be similar to the current lease.</li> <li>* May include references to Federal and State regulations in existence at the time of a new lease.</li> <li>* May be revised or added by the State in a new lease, but that the EIS cannot precisely analyze potential impacts because those lease conditions are unknown.</li> </ul> <p>Providing housing opportunities and employment on the trust lands (without the requirement of recruitment and monetary reparations to the Hawaiian people for the years of use of the trust lands) is beyond the scope of this EIS.</p>
Jessica Lucas		I am writing to express my strong opposition to the Draft Environmental Impact Statement (EIS) for the Army Training Land Retention (ATLR) at Kahuku Training Area (KTA), Kawaihoa-Poamoho	Please see General Response.

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		Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O’ahu. 1. Environmental Impact: The proposed retention of these training lands will result in significant and irreversible damage to O’ahu's unique ecosystems.	
Jessica Lucas		1. Environmental Impact: The proposed retention of these training lands will result in significant and irreversible damage to O’ahu's unique ecosystems. The Draft EIS does not adequately address the cumulative impacts of continued military training on endangered species and critical habitats. For example, the native flora and fauna, some of which are found nowhere else in the world, face increased threats from habitat destruction, pollution, and invasive species facilitated by military activities.	The Army used the best available information to complete the analysis of cumulative effects on biological resources discussed and analyzed in Section 3.3.6.
Jessica Lucas		2. Cultural Significance: These lands hold profound cultural and historical significance for Native Hawaiians. The ongoing use and potential expansion of military training areas threaten sacred sites, ancient trails, and traditional practices. <u>The Draft EIS fails to fully recognize and mitigate the adverse effects on cultural resources and the rights of Native Hawaiians as guaranteed under state and federal laws.</u>	Sections 3.4.5 and 3.5.5 of the EIS discuss impacts to historic and cultural resources and cultural practices, and management and mitigation measures to address these impacts.
Jessica Lucas		3. Community Health and Safety: The continued use of these areas for military training poses serious risks to the health and safety of nearby communities. <u>The Draft EIS does not sufficiently consider the impact of noise pollution, potential exposure to hazardous materials, and the long-term health effects on residents.</u> Moreover, the increased military presence exacerbates the already strained relationship between the military and local communities, fostering a climate of distrust and fear.	Sections 3.8.5 and 3.6.5, include an analysis on the potential impacts to humans and the environment from noise pollution and hazardous substances/hazardous wastes within their respective ROIs. Section 3.14.5 includes an analysis on the potential impacts to human health and safety within the ROI. As described throughout the EIS, health and safety hazards are managed through adherence to Federal and DoD regulations, Army safety programs, and standard operating procedures. The Proposed Action would not introduce new safety hazards. For alternatives where State-owned lands would not be retained, military training activities would be reduced or would cease, resulting in a reduction or elimination of military-related safety hazards in

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Jessica Lucas		<p>4. Alternatives Analysis: The Draft EIS inadequately explores viable alternatives to retaining these lands for military use. There is a <u>lack of thorough analysis of alternative training sites that could minimize environmental and community impacts</u>. Additionally, the potential for demilitarizing and repurposing these lands for conservation and community use has not been sufficiently considered, despite strong public interest in such outcomes.</p>	<p>these areas when compared to existing conditions.</p> <p>In addition to consideration of alternative training sites (see Alternative 9), Section 2.3.4 also explains why training 25th Infantry Division soldiers in the continental U.S. is infeasible. The Proposed Action in this EIS is land retention of State-owned lands, and alternatives for restationing were not considered further. Text was added to Section 2.3.4 and Table 2-8 accordingly, including consideration of use of other training areas on O’ahu. In addition, should State-owned lands not be retained, it would be the State’s responsibility for repurposing, which is beyond the scope of this EIS.</p>
Jessica Lucas		<p>5. Compliance with Environmental Laws: While the Draft EIS is prepared in accordance with NEPA, HEPA, and other relevant regulations, it falls short in meeting the substantive requirements of these laws. [...]</p> <p>The analysis is insufficiently detailed, and the public participation process has not been as inclusive and transparent as mandated. This undermines the integrity of the EIS process and calls into question the validity of its findings.</p>	<p>Chapter 4 and Appendix A of the EIS provide descriptions of how relevant regulations have been met.</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 actions and potential impacts from the Proposed Action (land retention), continuation of ongoing activities, lease compliance actions, and cleanup and restoration activities.</p> <p>The EIS process has included public engagement starting with consultation during scoping, and met the statutory requirements for public review of the Draft EIS. The Army has held more public meetings than required by NEPA and HEPA, and allowed additional time to what was originally allotted for the testimonies and public meetings</p>

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			to accommodate the strong public sentiment related to the Proposed Action.
Jessica Lucas		In conclusion, the Draft EIS for the ATR on O’ahu fails to provide a comprehensive and balanced assessment of the environmental, cultural, and social impacts of continued military training. I urge the Army to reconsider the retention of these training lands and to explore more sustainable and community-oriented alternatives. Thank you for considering my testimony. Aloha ‘Āina ‘Oia’i’o, Jessica Kēhaulani Lucas	Please see General Response.
Karen Luke		The U.S. Army has leased our for the last six decades for \$1 per year. This is not fair or equal rent. The current draft EIS also fails to evaluate my family's concern for our future. The EIS is required to assess the climate-related impacts of our long-term food and water security by unremediated contamination of historically abundant agricultural lands which contributes to our current dependence on imported food; and the carbon footprint and impacts of the national-multinational exercises to “deter” aggression. The EIS also fails to describe how our concerns could be mitigated or have carbon-intensive training reduced, especially with the DoD’s vast resources and status as the largest institutional consumer of fossil fuels. Please address these concerns. Mahalo, Karen Luke Ewa Beach, HI 96706	Please see General Response.
Kalehua Lu'uwai		The us military has a well-documented long history of being mana'ole and pono'ole in Hawai'i nei. Now it is time for the us military to reduce their footprint in Hawai'i nei. The us military can take themselves to where there are conflicts on the planet to practice murdering humans. Go to Gaza, Ukraine, and Haiti. The us government has manipulated and exploited Hawai'i nei long enough. The us government should no longer be allowed to lease state lands to promote and practice the murdering of humans.	Please see General Response.
D. Keali'i MacKenzie		Please accept this as my personal testimony and comments regarding the US Army Draft Environmental Impact Statement (Draft EIS) on proposed retention of stolen Hawaiian Kingdom lands in Mākua Valley, Poamoho, Kahuku. The Draft EIS does not acknowledge the depth of the generational	Please see General Response.

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		<p>harms that have resulted from the US military-aided illegal overthrow of the Hawaiian Kingdom, harms that would be exacerbated by the continued occupation and abuse of these stolen Hawaiian lands by the U.S. Department of Defense and its "allies". In fact the military presence on Hawaiian lands has caused extensive damage to our environment and threatens our precious natural resources like our water. As we have seen with the fuel leaks at Red Hill, the public cannot trust the military to steward these lands for anything except war and war mongering. It is time for the Army to return these lands and begin the long and necessary process of cleaning up these long-abused lands.</p> <p>It is also worth pointing out that in the Draft EIS, the US Army admits that there will be "significant adverse impacts" on land use (land tenure) and environmental justice with the retention of any lands at Kahuku, Poamoho, and Mākuā.</p> <p>The Draft EIS fails to acknowledge the greatest and most imminent threat to the security of the U.S. and the planet - the climate crisis - which will only be exacerbated by the status quo priorities the Army is pursuing under its training programs. The draft EIS also fails to acknowledge how the US military is the world's largest polluter and emitter of carbon gasses.</p> <p>The US Army only paid \$1 for 65 year leases. It is not in the best interest of our island home and residents to allow the US Army to retain these lands. Every acre should be returned to the rightful owners including those families who were removed by force. I cannot in good conscience support the extension of these leases. The ongoing degradation and land theft must end. When the leases terminate, so must the presence of the Army on these lands.</p>	
Misti Madden		Oppose.	Please see General Response.
Pōki'i Magallanes		<p>Eia mākou nā koa o Lili'uokalani, palikū lailai, Palikū Ka'ala, Pali kū Molokapu, moe ai ka wahipana Kamauluniho. Aloha mai kakou.·                      My name is Elton Magallenes aka Poki'i.· I am the lead of --or initiated Waianae's first haulimua (hale mua). I also represent Nakua Mauna 'Ala, and I am in opposition of the extended lease of Makau and any other occupied space the military has. ···· For</p>	Please see General Response.

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		<p>generations hewa upon our land, desecration on our resources.· Unusable resources literally blown to smithereens.· Decimated resources.· Ecosystems that cannot be replaced. This is what you guys did.· Do you hear it from our people? · · · · · I'm here.· I was here back in '97 seeing ao-le and beat it.· Standing here with handfuls of makua still here, I'm amazed.· With Auntie Frenchie DeSoto and Auntie Tiola Silva, pokalai nui, Uncle Manaku, Uncle Bill Aila, Glen Kila, all our nā koa, even the young ones.· I was young at that time with Tita Anila, Mauna Kea. · · · · · But I wanted to be here present to see you on your way out.· Aloha means hello, but aloha also means goodbye.· Okay?· We have been traumatized. I lost uncles serving your military, family members affected by Agent Orange during Vietnam.· My uncles dealing, still today, with PTSD resulting in suicide, meds.· Okay.· Our people cannot take this anymore and thank goodness lahui brought your kamali'i.· They have to be here. · · · · · And I encourage all of Lihue make more babies, make more warriors.· Send them to me.· Let's train them.· All your kani, send them to me.· Let's train them and show the military what real koe is about. · · · · · Mahalo, Steve, for catching all the spears today.· It takes a real man to be -- and for catch all the spears because you get all of these invisible spears coming at you, brah, and I see them.· Your head, your ear, your knees.· Probably you got -- okay?· So when you go home, before you go home jump in the waters of Makau.· Give them to Kanaloa, pull all that ea out and repent. Repent the hewa your leadership. · · · · · Mahalo, Lihue.· Make more babies, more soldiers.</p>	
Keoni Mahelona		<p>I am against the Army continuing to use these lands for training. Enough environmental damage had been done to Hawai'i over the decades. In addition to environmental impact, we must also assess the social, cultural, and economic impacts. What's the opportunity cost of using this land for Army training instead of using it for agriculture, tourism, housing, etc. Hawai'i is a small and delicate ecosystem. The US has many other millions of acres of land that would be equally suitable for training while having less impact of the people of Hawai'i</p>	Please see General Response.

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Alisha Mahone-Brooks		I Alisha Mahone-Brooks as a citizen of Hawai'i contest and oppose the use of/for Army Training Land Retention (ATLR) at Kahuku Training Area (KTA), Kawaioloa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O'ahu.	Please see General Response.
Velma Manaole		I wanted to be last, so I stay. No. Just joking. Just joking. No, but for real, a lot of you guys said a lot that was on my mind. I want to tell everybody, I appreciate all of you, even you guys. I know that you guys are not the head of all of this, but I appreciate your patience and allowing yourselves to be a sort of punching bag. But I apologize for that. Thank you all for being here. Thank you for the food. Whoever was looking out for us, I appreciate that. I want to say it's time to wake up. It is time to wake up. It is time to wake up. I've been sleeping. I'm waking up now. And I'm sorry for that. But I'm here now, and my goal is to be a part of this stuff. You know what I'm saying? For our people. This is to our people. This is for our people. It's our kuleana, you know? Thank you, guys. Now, I hope you guys know that, according to the board, that this is an info session. Okay? So all the passion that I heard today, that was expressed today, I hope you guys keep that fire, and do something with it. We got to start coming together. I know life in this system of things has us busy. We busy paying rent that's going forever high. We busy trying to buy food. We busy taking care of our kids. Yeah? But we have to start doing something. We got to start coming together as a people -- as a people. Okay? So hopefully we can exchange some information today. Yeah? But we know this isn't going anywhere. This is a formality. We get it. We have to find the correct platform. Yeah? We got to find the correct platform. Besides that -- I think I said enough -- I wanted to call my brother, Kauka. Sorry. Yeah, yeah, yeah. Come, come, come, come, come, come.	Please see General Response.
Keke Manera		The Army, the military over all needs to pack it up and stop with the charades. They have not been good stewards to these islands. They are NOT protecting Hawai'i and in fact they're protecting a belligerent corrupt government that doesn't even care about their own. Look what they did to their own personnel. They poisoned not	Please see General Response.

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		<p>only their own members but the community they claim they protect! How embarrassing! Me and my family oppose the lease renewals and we would like for the military to do the right thing once and for all. Clean up their act and get out!</p>	
Stephanie Manera		<p>MILITARY EXERCISES ON HAWAIIAN PUBLIC LANDS HAVE HISTORICALLY CAUSED EXTENSIVE DAMAGE TO THE ENVIRONMENT. THAT INCLUDES ENDANGERING NATIVE PLANTS AND ANIMAL SPECIES - POLLUTING NATURAL RESOURCES - DESECRATING THE NATURAL LANDSCAPE - AND DESTROYING SACRED LANDMARKS. THE U.S. MILITARY HAS DONE THE MOST DAMAGE TO THESE ISLANDS THAN ANY OTHER NATION. SINCE 1893 THE MILITARY HAS BEEN TYRANTS, BULLIES AND A DESTRUCTIVE ENTITY CAUSING NEGATIVE IMPACT IN HAWAI'I. HAWAI'I IS NOT BEING PROTECTED BY THE U.S. MILITARY! THE NAVY IS ONE PRIME EXAMPLE OF THE MILITARY INCOMPETENCE. POISONING THE ONLY WATER SOURCE FOR THE ISLANDS, TALK ABOUT RECKLESSNESS AND ENDANGERMENT TO THE VERY PEOPLE AMERICA CLAIMS TO PROTECT. THE MILITARY NEEDS TO END THEIR BELLIGERENT UNLAWFUL OCCUPATION OF THESE ISLANDS AND PACK IT UP! ALOHA ALSO MEANS GOODBYE!</p>	Please see General Response.
Rhianalei Manera		<p>Aloha mai kakou. My name is Rhianalei, and I just wanted to come up here and let you guys know that we don't need the military here. A few months ago, it was career day career day for my school. I remember Hawaii Peace and Justice was one of my career choices. And they wanted us to talk about -- share our thoughts about whether the military is helping Hawaii or not. This topic really had me think about all the damage you guys have done and will continue to do if you guys stay here. All you guys do -- all you guys do is destroy our land, our people, and our culture. I want to know what goes through you guys' head when you think about us kanaka. Why do you think it's okay to continue destroy our home? You guys need to understand that this isn't America. We have our own culture and our own language. It's sad how rare it is to hear Hawaiian language being spoken in Hawaii. Our Kaiapuni schools value the language and the practices of our kupuna. How do you</p>	Please see General Response.



Commenter	Submitted By	Comment	Response
		think kupuna -- kupuna will feel if we allow the people that overthrew our kingdom to stay and continue this heva?· Here I am, as a descendant of these kupuna, to stop this· Mahalo.	
Carla Marin		The United States Army , I am writing to express my strong opposition to the renewal of the Army Training Land Retention at Kahuku Training Area, Kawaiiloa-Poamoho Training Area, and Makua Military Reservation on the island of O'ahu. Renewing this military lease is harmful to our communities, our environment, and our future. The continued military presence in Hawai'i not only endangers our safety by making our islands a potential target but also perpetuates a long legacy of toxic abuse. This includes evictions, restricted access, desecration of burial sites, intentional bombing of cultural landmarks, and the irreversible pollution of our lands and waters with harmful toxins. Extending these leases will only exacerbate these issues. Furthermore, the draft Environmental Impact Statement (EIS) fails to adequately assess the socio-economic impacts of the Army's continued presence in Hawai'i. For example, 38% of arrests from Operation Keiki Shield, which targets internet-facilitated crimes against children, involved active-duty personnel. Additionally, the substantial housing allowances provided to military personnel create an unjust imbalance in the rental market, making it increasingly difficult for local residents to find affordable housing and worsening our dire housing crisis. The Army also overlooks the significant cultural impacts and the consequences of limited or no access to these lands for our local communities. Instead of furthering the militarization of Hawai'i, this land could be repurposed to address urgent community needs such as affordable housing, energy independence, and action on climate change. For these reasons, I strongly oppose the U.S. Army's proposal to renew its lease on O'ahu. Carla Marin	Please see General Response.
Suzanne Marinelli		I am opposed to the extension of the leases of Hawai'ian lands to the military. Please do not extend them, as the military's occupation of these lands is in opposition to the baseline nature of Hawai'i.	Please see General Response.
Jeane Marshall		I'd like to express my deepest concerns and opposition to the Army and all Military presence in Hawaii and on Oahu . The lease needs to	Please see General Response.

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		<p>end and the US Military needs to pull out of Hawai'i . I am a concerned citizen the continued occupation by the military has created an unsafe environment for kanaka and all who live and visit Hawaii. Stop putting profits over people and human rights. poisoning Land poisoning and our Water has been a continued practice of the military while conducting experiments and trainings there have been forever chemicals spilled into the water, and now being vented into the air. The people of Hawai'i are telling you it's time to leave and are tired of this ongoing occupation. It is not to the benefit or best interest of the people of Hawaii. Hear the voices of those who are telling you that they are being affected by the military by the army and everything that has been happening over the years with the presence of you guys. Here you are no longer welcome, and are being asked to leave . Hawaii is a sacred land full of culture and beauty and you are destroying what is left . This is not a place for your training. Clean up your mess and get out !!!!</p>	
Liko Martin		<p>TO: U.S. ARMY GARRISON Hawaii, Written Comments to: The Environmental Impact Statement (EIS) for Army Training Land Retention (ATLR) of State Lands at Kahuku Training Area (KTA), Kawaiiloa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the Island of Oahu. called “Oahu ATLR EIS’ for short...to retain an approximately 6,322 acres of State-owned lands...The Proposed Action is a real estate action that would enable continued military use of the State-owned lands a these three installations on O’ahu, located in the non-contiguous Pacific Area of the Hawaiian Islands. A Draft EIS has been prepared under the National Environmental Policy Act (NEPA) and Hawaii Environmental Policy Act (HEPA). Both NEPA and HEPA ensure environmental concerns are given appropriate consideration in decision-making, along with economic and technical considerations. ((Written Comments submitted to: emailed to ATLR-Oahu-EIS@g70.design; mailed to O’ahu ATLR EIS Comments, P.O Box 3444, Honolulu, HI. 96801-3444, or submitted/provided during public meetings, or by phone on July 9, 10, &amp; 11 2024. U.S. Army Garrison Hawaii is the Official Sponsor of the EIS website. Questions</p>	Please see General Response.

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		<p>regarding its content may be directed to the U.S. Army Garrison Hawaii’s Public Affairs Office at 787-2140. (last updated 6/7/24.) To whom it may concern, Public input is a valued part of the NEPA and HEPA processes. (The Draft EIS comment period begins June 7, 2024 and ends on August 7, 2024...draft EIS published in the June 8, 2024 issue of the State Environmental Review Programs publication), the following comments, and requests for assistance are submitted.</p>	
Liko Martin		<p>CAVEAT <i>“In recognition of the historic role of the United States to carry forth the mandate of the Treaty of Versailles, by underwriting the formation and operations of the United Nations at the end of WWII, it is recalled that on 9 December 1948, the United Nations adopted the Convention on the Prevention and Punishment of the Crime of Genocide, being the first human rights treaty, unanimously adopted by the General Assembly, entering into force on 12 January 1951. Genocide is defined as any of five(5) “acts committed with intent to destroy, in whole or in part, a national, ethnical, racial or religious group”. These five acts were: <b>killing members of the group, causing them serious bodily or mental harm, imposing living conditions intended to destroy the group, preventing births, and forcibly transferring children out of the group.</b> Victims are targeted because of their real or perceived membership of a group, not randomly, and the convention further criminalizes, complicity, attempt, or incitement of its commission. The Genocide Convention authorizes the mandatory jurisdiction of the International Court of Justice (ICJ) to adjudicate disputes, recalling that in 1960 the South African government was expelled from Namibia, because it <u>did not have a treaty of annexation, and was found to be enforcing policies of apartheid, by distinction, exclusion, restriction and limitation, based on national origin, race, color, ethnicity and religion, which parallels the current situation in the Hawaiian Islands. The United States became a U.N. signatory in 1986 and codified the Convention into U.S. Pub. Law. 100-606, “The Proxmire Act”, Nov. 4, 1988, Pres. Ronald Reagan (18 USC 1091 Chapter 50A - GENOCIDE), see <a href="#">1993</a></u></i></p>	Please see General Response.

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		<p><a href="https://drive.google.com/file/d/1Bxj9SadrgBbhmhoKAbEnteuzUy6antpm/view">Tribunal</a>                      [https://drive.google.com/file/d/1Bxj9SadrgBbhmhoKAbEnteuzUy6antpm/view)).</p> <p><i>It is to be noted that, Member States of the United Nations are prohibited from engaging in genocide and obligated to pursue the enforcement of this prohibition, any perpetrators are to be tried regardless of whether they are private individuals, public officials or political leaders with sovereign immunity. The (ICJ) International Court of Justice has likewise ruled that the principles underlying the Convention represent a preemptory norm against genocide that no government can derogate.</i></p> <p><i>Although the United States is not a signatory to the International Criminal Court (ICC), “Rome Statute (Elements of Crime), it may be of some importance to know that “apartheid” is defined as a crime against humanity “committed in the context of an institutional regime of systematic oppression and domination by one racial group over any other racial group or groups and committed with the intention of maintaining that regime”. The explanation by the United States for not signing and ratifying the 1973 United Nations International Convention on the Suppression and Punishment of the Crime of Apartheid was, [W]e cannot.... accept that apartheid can in this manner be made a crime against humanity. Crimes against humanity are so grave in nature that they must be meticulously elaborated and strictly construed under existing international law...”</i></p> <p><i>In 1977, Additional Protocol 1 to the Geneva Conventions designated apartheid as a grave breach of the protocol and a war crime”., (excerpts from Letter - 17 JUNE 2024 to United States Congress, Senate Committee on Foreign Relations, fm: Liko-o-kalani Martin....)</i></p> <p>As a matter of law, the government officials in the Hawaiian Islands, being part of the Peoples/citizenry of the United States political subdivision known as the State of Hawaii, under the adoption of the United States Federal Constitution, have sworn an oath “to support and defend” both the United States and state of Hawaii Constitutions, which <u>requires them to ensure the native tenants</u></p>	

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		<p><u>due process of law</u>, the absence of which has resulted in longstanding and widespread violations of United States domestic law, laws of the US state of Hawaii and its municipalities and customary norms and instruments of international law. It is recalled that In 1907 (at the HAGUE) the United States became a signatory to Geneva Convention IV - Respecting the Laws and Customs of War on Land, and its Annex Regulations Concerning the Laws and Customs of War on land, Section III - Military authority of the Hostile State - wherein it is stated in Article 55, <u>“The occupying State shall be regarded only as administrator, and usufructuary of public buildings, real estate, forests, and agriculture estates belonging to the hostile State, and situated in the occupied country. It must safeguard the capital of these properties, and administer them in accordance with the rules of usufruct.; Article 56 - The property of municipalities, that of institutions dedicated to religion, charity and education, the arts and sciences, even when State property, shall be treated a private property. All seizure of, destruction or wilful damage done to institutions of this character, historic monuments, works of art and science, is forbidden, and should be made the subject of legal proceedings.</u> [20 AmendmetXIV. Section 1. United States constitution.]</p> <p>It is further recalled that in 2010 the U.S. National Park Service 20 year audit of the State of Hawaii historic preservation programs and designated the State of Hawaii as a “high risk grantee”, which lasted until 2019, yet it appears that <b>“major aspects”</b> of the historic preservation programs under the State of Hawaii and Counties <b>do not meet the “requirement of equal footing,”</b> stipulated in U.S. Executive Proclamation 3309, Pres. Dwight D. Eisenhower, <b>by way of compliance with the REVISED LAWS OF HAWAII 1955, Volume I, Chapter 14- CERTAIN RIGHTS OF THE PEOPLE - HAWAIIANA (RLH1955,V.I-C-14), “Any law to the contrary notwithstanding, ”</b> (see as <a href="#">Attachment</a> [https://drive.google.com/file/d/1SifYV7OfFP7ebB6j1HlyU7Ecw6xxy</p>	

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		<p>LMC/view] ) <u>in order to prevent conduct “forbidden” under Geneva IV).</u>  <b>Your assistance is respectfully requested, in respect to upholding the integrity of these proceedings, to sequester the “discretion of the Secretary”, so as to determine whether or not, and to what degree, “major aspects” of the operations of the State of Hawaii Historic Preservation Programs under United States Code Title 16 - Conservation - Part A, are inconsistent with the requirements under the statute, in order to ensure conformity and compliance with the “chief governing authority” (RLH1955,V.I-C-14), towards qualifying, certifying and overseeing the historic preservation programs and activities of any “local government”, which includes (the U.S. State of Hawaii and Municipal Counties, (functioning under their respective constitution and by laws, or the non-exclusive powers, within the self proclaimed Charters of the several Counties).</b>                      It is recalled that the Governor's Office of the State of Hawaii received an <b>(U) UNCLASSIFIED MEMORANDUM</b>, dated January 20, from the United States Department of State, via the Legal advisor, Harold Hongji Koh, on the subject: U.S. Human Rights Treaty Reports, (a copy is enclosed), emphasizing that the implementation of these international obligations should be taken very seriously, urging the Governors and Mayors, <b>“to</b></p>	

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		<p><i>make government officials, the judiciary, federal and state law enforcement officials, teachers, social workers and the public in general aware about the responsibilities of the State party under the Conventions, because <u>implementation of these treaties may be carried out by officials at all levels of government (Federal, State, insular and local)</u></i>. [22 Kauai County Codes Sec. 19-1.5 Operating Policy.</p> <p>(a) Parks shall be open to the public every day of the year during the designated hours unless closed for good cause by the Director. The opening and closing hours of each park and recreation facility shall be posted therein.</p> <p>(b) Any section or part of any park or recreation facility may be declared closed to the public by the Director at any time, as the Director shall find reasonably necessary for the health, safety or welfare of the public. (Ord. No. 383, April 30, 1980; Ord. No. 852, July 1, 2007)]^j</p> <p>Despite the January 20, 2010, (UNCLASSIFIED) Memorandum from the United States, Department of State, notification to executive branches, governors and mayors on the importance of human rights treaty obligations, involuntary servitude, apartheid, discrimination, deprivations and denials of human rights are a part of everyday life, for the vast majority of “Native and Part-native” Inhabitants, including other citizenry, having sharply accelerated in the aftermath of the 1993 Apology Resolution, all of this occurring within the context of the continuing civil war that was protracted on January 17, 1893.</p> <p>As stated in the (ICCPR) International Covenant on Civil and Political s, <u>Article 5 (1) Nothing in the present Covenant may be interpreted as</u></p>	

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		<p><u>implying for any State, group or person any right to engage in any activity or perform any act aimed at the destruction of any of the rights of freedoms recognized herein...(2) There shall be no restriction upon or derogation from any of the fundamental human rights recognized or existing in any State party to the present Convention pursuant to law, conventions, regulations or custom on the pretext that the present Covenant does not recognize such rights or that it recognizes them to a lesser extent;</u>  <u>Article 26 - All persons are equal before the law and are entitled without any discrimination to equal protection of the law. In this respect, the law shall prohibit any discrimination and guarantee to all persons equal and effective protection against discrimination on any ground such as race, color, sex, language, religion, political or other opinion, national or social origin, property, birth or other status.</u></p> <p>For decades, the State and counties have allowed the destruction of hundreds, if not thousands, of Hawaiian villages sites and “places of worship” throughout the islands, often to support, at times by so-called “Emergency Proclamation”, private and for-profit land developments, effectively interfering with the free exercise of inherent rights of sovereignty and fundamental human rights, to which the United States is obligated to preserve, protect and ensure, in spite of the condition of</p>	



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		<p>civil war since January 17, 1893, and enforcement of policies of apartheid by distinction as a “Native Hawaiian”, exclusion, restriction, limitation and regulation, based on “national origin”, race, color, religion, and ethnicity, by way of U.S. Congress “Admissions Act of 1959” and the U.S. Congress Hawaiian Homes Commission Act of 1920.</p>	
Liko Martin		<p><b><u>GOVERNMENT OPERATIONS EXEMPLIFYING DEPRIVATIONS OF CIVIL LIBERTIES, CIVIL RIGHTS, VESTED RIGHTS IN LAND AND DEPRIVATION OF DUE PROCESS</u></b> - A. One primary example regarding inefficiency of government operations is with regards to the State of Hawaii, “State system” of historic preservation programs within which there appear to be “major aspects” that are inconsistent towards and since 1959, appears to be the lack of integrity, efficiency and adequacy of administrative capacity to meet the “requirement of equal footing”, as stipulated in United States Executive Proclamation 3309, Pres. Dwight D. Eisenhower, to assist the United States in “attaining its international obligations”, (per U.S.Pub.L. 99-239, Compact of Free Association Act of 1986, Title III - Pacific Policy Reports - “Congress finds - that it does not have a clearly defined policy”), within the non-contiguous Pacific area of the Hawaiian Islands?  The <b>absence</b> of a Historic Preservation Review Commission (HPRC), In accordance with the provisions of United States Code Title 16 - Conservation, Part A - Historic Preservation Programs, is extremely problematic as it does not ensure representation and implementation of the “chief governing authority”, as represented by way of the <b>REVISED LAWS OF HAWAII 1955 (RLH 1955), Volume I, Chapter 14, CERTAIN RIGHTS OF THE PEOPLE, HAWAIIANA</b>, [Civil Codes of the Hawaiian Islands (1859), Miscellaneous Laws Chapter XXXIV, Certain Specific Rights of the People, Section 1477], <b>subsection 14-8, “Any law to the contrary notwithstanding,,,”, with respect to qualifying, certification and overseeing of historic preservation programs of any “local government”, which includes</b></p>	Please see General Response.

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		<p><u>the U.S. political subdivision, aka state of Hawaii and the various ‘self chartered’ municipal counties, and all the subsidiary administrative organs.</u></p> <p>The insufficiency and inefficiency of the “State system” for historic preservation is reflected by its failure to take into account that the <b>“Hawaiian people” have not</b> left, and the overriding of their civil liberties, civil rights, vested rights in land, and the lives of persons, whose family honors, cultural activities and traditions, which is intrinsically related to the multitude of those historic cultural places vital to the “interests” of the living “Native and Part Native” Inhabitants/descendants, who continue to reside within, occupy and exercise the inherent sovereignty “in the national lands”, that Congress in 1993 recognized as never voluntarily surrendered, whereby being subjected to constant discrimination, aggression, persecution, mutilation, partial or complete destruction, defiling, desecration, contamination and alteration, whereby the ability of the host culture to maintain their identity, “Hawaiian National usage” and a viable cultural lifestyle and economy, have been futile and greatly diminished to say the least.</p> <p>As such your assistance is requested, in order to achieve compliance, within the non-contiguous Pacific area of the Hawaiian Islands, with:</p> <p>United States Proclamation 3309, President Dwight D. Eisenhower (1959), “equal footing requirement”; by way of the REVISED LAWS OF HAWAII 1955, VOL I, Chapter 14, CERTAIN RIGHTS OF THE PEOPLE, HAWAIIANA, [Civil Codes of the Hawaiian Islands of 1859), with respect to United States Code (USC) TITLE 16 -CONSERVATION - Part A - Historic Preservation Programs, per Sec. 407-1(b-A) (b) 1 (D), wherein it is stated , “If at any time, the Secretary determines that a major aspect of a State program is not consistent with this subchapter, the Secretary shall disapprove the program and suspend in whole or in part any contracts or cooperative agreements with the State and the State Historic Preservation Officer under this subchapter until the program is consistent; and...to establish oversight methods to ensure State program</p>	

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		<p>consistency and quality, wherein at the discretion of the Secretary, a State system of fiscal audit and management may be substituted, and regarding assumption of the functions of a State Historic Preservation Officer for historic preservation programs under United States Code, Title 16-CONSERVATION, Part A - Historic Preservation Programs, (470-1(b-A) (b) 1 (D), in the capacity of a Historic Preservation Review Commission, to ensure quality, efficiency and oversight, and certification of a any “local government”, in order to maintain consistency with respect to conservation for historic preservation.</p> <p><b><u>In lieu of the aforementioned activities, observing and taking note of the overwhelming objections expressed by a multitude of oral comments given before the U.S. Army Garrison, that those comments will be added as supplement/attachments to formal request(s) for Oversight Hearings before committees of the United States Congress, for the purpose of providing information, with respect to advising the Secretary of State, and President of the United States of America, as Commander in Chief , in regards to Congress having expressed its “commitment to acknowledge the ramifications of the overthrow of the Kingdom of Hawaii, in order to provide a proper foundation for reconciliation between the United States and the Native Hawaiian People” , with respect to United States Public Law 103-150, 107, Apology Resolution (Stat. 1510, 1512), Nov. 23, 1993. Pres. W. J. Clinton Please find the enclosed attachment, respectfully submitted to provide NOTICE of a wider perspective, within the context of the aforementioned consultations processes, in order to provide a proper foundation towards assisting the United States in “attaining its international obligations”, such as within the guidelines and procedures outlined in U.S.P.L. 99-239, Compact of Free Association Act of 1986, Title III - Pacific Policy Reports, Congress finds - that it does not have a clearly defined policy...SEC. 301, 302, 303. Conferencing. Please see the following attachment submitted as part of the comments to the: U.S. Army Garrison Hawaii as the Official Sponsor of the EIS website.</u></b></p>	

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		<p><b><u>Questions regarding its content may be directed to the U.S. Army Garrison Hawaii’s Public Affairs Office at 787-2140. (last updated 6/7/24), or directed to Liko Martin, email–</u></b></p>	
Liko Martin		<p>COMPLAINT AND REQUEST FOR UNITED STATES INVESTIGATION AND INTERVENTION IN THE HAWAIIAN ISLANDS Jurisdiction</p> <p>The United States Department of Interior appears to hold jurisdiction over investigations of civil actions related to the ‘public trust’ lands transferred by the United States of America, to its political subdivision aka STATE OF HAWAII, within the Admissions Act of 1959, when the ‘lands, proceeds, and income’ as defined therein, are used ‘for any other object shall constitute a breach of trust’.</p> <p>The United States Department of Justice is tasked with investigations of alleged criminal violations under the United States Criminal Codes, including, but not limited to, violations of civil liberties, government waste, and public corruption.</p> <p>The United State Department of State is tasked with advising the President, as Commander in Chief, on foreign policy in compliance with international treaties.</p> <p><u>Introduction</u>  <u>Relating specifically to the “crown lands” portion of the “public trust...obligations” of the “United States, the State of Hawaii and its People”.</u></p> <p>When the United States first acquired an interest “whatsoever kind” in the “crown lands”, via the Newlands Resolution in 1898 from the Republic of Hawaii, that interest was restricted, subject to the reservation of certain rights, affirmed in 1839 by His Majesty King Kamehameha III, and were included as being part of ‘<i>Hawaiian National usage</i>’ [1 however, that no person shall be subject to criminal proceedings except as provided by the Hawaiian laws’ [Section 5. Chapter LVII. An Act, To Reorganize The Judiciary Department, enacted on November 25, 1892, took effect on January 1. 1893] ‘The common law of England, as ascertained by</p>	Please see General Response.

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		<p>English and American decisions, is hereby declared to be the common law of the Hawaiian Islands in all cases, except as otherwise expressly provided by the Hawaiian Constitution or laws, or fixed by Hawaiian judicial precedent, or established by <b>Hawaiian national usage</b>, provided by Her Majesty Queen Liliuokalani on November 25, 1892. The "crown land" title carried certain specific terms and conditions, including the fact that, the fee-simple interest `is the 'inalienable', and 'private' [2 'It is further enacted, that so many of the lands which by the Statute enacted on the 7th of June, 1848, are declared to be the <b>private</b> lands of His Majesty Kamehameha III., to have and to hold to himself, his heirs and successors <b>forever</b>, as may be at this time unalienated, and have descended to His Majesty Kamehameha V., shall be henceforth <b>inalienable</b>, and shall descend to the heirs and successors of the Hawaiian Crown forever ; and it is further enacted, that it shall not be lawful hereafter to execute any lease or leases of the said lands, for any term of years to exceed thirty. SECTION 3. AN ACT To RELIEVE THE ROYAL DOMAIN FROM ENCUMBRANCES, AND TO RENDER THE SAME INALIENABLE. January 3rd . 1865] property of the Royal Domain of the Hawaiian Kingdom Monarchy. The specific intent of the sovereign of the Hawaiian Islands was to protect those lands from 'being considered public domain' and 'the danger of confiscation in the event of his islands being seized by any foreign power', [3 'The records of the discussion in Council show plainly His Majesty's anxious desire to free his lands from the burden of being considered public domain, and as such subjected to the danger of confiscation in the event of his islands being seized by any foreign power, and also his wish to enjoy complete control over his own property.'" Besides he clearly perceived how desirable it was that there should be a public domain, the proceeds of which should go to the national treasury, and from which his subjects could purchase the lands which they needed' THE "MAHELE" OR GREAT DIVISION. A BRIEF HISTORY OF LAND TITLES IN THE HAWAIIAN KINGDOM BY W.D. ALEXANDER, Superintendent of Government Survey, 1891] such as the Republic of Hawaii, or the</p>	

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		<p>United States of America.</p> <p>In 1993, the United States Congress answered a key political question related to the unlawful seizure of the ‘crown lands’ by the Republic of Hawaii, that the transfer to the United States was done ‘without the consent of or compensation to ...their sovereign government...’ [4 Section (9) ‘In 1898, Hawaii was annexed to the United States through the Newlands Resolution without the consent of or compensation to the indigenous people of Hawaii or their sovereign government...’ACT 359 S.B. NO. 1028 A Bill for an Act Relating to Hawaiian Sovereignty. 1993]</p> <p>In 1994, the Supreme Court of Hawaii fully acknowledged and affirmed that, by ‘Our examination of the relevant legal developments in Hawaiian history leads us to the conclusion that the western concept of exclusivity is not universally applicable in Hawai’i...’. [5 ‘Our examination of the relevant legal developments in Hawaiian history leads us to the conclusion that the western concept of exclusivity is not universally applicable in Hawai’i. Cf. Stevens v. City of Cannon Beach, 317 Or. 131, 143, 854 P.2d 449, 456 (1993), cert. denied, 114 S.Ct. 1332 (1994) (holding that “(w)hen plaintiffs took title to their land, they were on (constructive) notice that exclusive use ... was not part of the ‘bundle of rights’ that they acquired”). In other words, the issuance of a Hawaiian land patent confirmed a limited property interest as compared with typical land patents governed by western concepts of property. Cf. United States v. Winans, 198 U.S. 371, 384 (1905), [Discussed in PASH ]] As such, as prescribed by Hawaiian National usage, the rights of the ‘native tenants’ can only be limited when ‘...the landlords have obtained, or may hereafter obtain, allodial titles to their lands...’[6 ‘Where the landlords have obtained, or may hereafter obtain, allodial titles to their lands, the people on each of their lands shall not be deprived of the right to take firewood, house-timber, aho cord, thatch, or ki leaf, from the land on which they live, for their own private use, but they shall not have a right to take such articles to sell for profit. The people shall also have a right to drinking water, and running water, and the right of way. The springs of water, running water, and</p>	

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		<p><i>roads, shall be free to all, on all lands granted in fee simple : provided, that this shall not be applicable to wells and water-courses, which individuals have made for their own use.</i> [Civil Codes of the Hawaiian Islands (1859), MISCELLANEOUS LAWS. CHAPTER XXXIV. OF CERTAIN SPECIFIC RIGHTS OF THE PEOPLE. SECTION 1477]]</p>	
Liko Martin		<p><b>COUNT 1</b>  <u>Deprivation of ‘due process’ duties and “obligations” by the state of Hawaii (SOH) Board of Land and Natural Resources (BLNR) and the county of Kauai under ‘color of law’</u>[7 Title 18 U.S. Code § 242 - Deprivation of rights under color of law.].  <u>Background</u>                      For the past several years a group of twenty-one persons of Hawaiian “national origin”, single mothers, their children, and grandchildren were in ‘possession’ of a small area of “crown” lands within the ahupuaa(district) of Hanapepe, on the Island of Kauai. These women were exercising their rights articulated within ‘<i>Hawaiian National usage</i>’[8 ‘The common law of England, as ascertained by English and American decisions, is hereby declared to be the common law of the Hawaiian Islands in all cases, except as otherwise expressly provided by the Hawaiian Constitution or laws, or fixed by Hawaiian judicial precedent, or established by <b>Hawaiian national usage</b>, provided however, that no person shall be subject to criminal proceedings except as provided by the Hawaiian laws’ [Section 5. Chapter LVII. An Act, To Reorganize The Judiciary Department, enacted on November 25, 1892, took effect on January 1, 1893]] as ‘native tenants’, being ‘the actual possessors and cultivators of the soil’, as those rights are vested to them ‘to have and to hold, to them, their heirs and successors forever.’[9 ‘2.- One-third of the remaining lands of the Kingdom shall be set aside, as the property of the Hawaiian Government subject to the direction and control of His Majesty, as pointed out by the Constitution and Laws, one-third to the chiefs and Konohiki(s) in proportion to their possessions, to have and to hold, to them, their</p>	Please see General Response.

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		<p>heirs and successors forever, and the remaining third to the Tenants, <b>the actual possessors and cultivators of the soil</b>, to have and to hold, to them, their heirs and successors forever. [see A BRIEF HISTORY OF LAND TITLES IN THE HAWAIIAN KINGDOM, BY W.D. ALEXANDER, Superintendent of Government Survey, 1891, “ANCIENT SYSTEM OF LAND TENURE.”], and while their entitlement to obtain ‘fee-simple title to one-third of the lands possessed and cultivated by them’ is also vested in law, and at present they did not ‘desire such division’ [10 ‘4-The Tenants of His Majesty’s private lands, shall be entitled to a fee-simple title to one-third of the lands possessed and cultivated by them; which shall be set off to the said Tenants in fee-simple, whenever His Majesty or any of said Tenants shall desire such division. [see A BRIEF HISTORY OF LAND TITLES IN THE HAWAIIAN KINGDOM, BY W.D. ALEXANDER, Superintendent of Government Survey, 1891, “ANCIENT SYSTEM OF LAND TENURE.”]. Those persons were exercising their human liberties of ‘self-determination’ [11</p> <p>‘All peoples have the right of <b>self-determination</b>. By virtue of that right they freely determine their political status and freely pursue their economic, social and cultural development. PART I. Article 1. International Covenant on Civil and Political Rights. Adopted and opened for signature, ratification and accession by General Assembly resolution 2200A (XXI) of 16 December 1966 entry into force 23 March 1976, in accordance with Article 49] and likewise sought the protection of their constitutional, civil and political liberties within the context of ‘Hawaiian National usage’, as native tenants, to malama (care for) themselves, and their future generations. They had made a personal choice of no longer identifying themselves as being a “NativeHawaiian” [12 The term "native Hawaiian" means any descendant of not less than one-half part of the blood of the races inhabiting the Hawaiian Islands previous to 1778; section (7), ARTICLE 2. Hawaiian Homes Commission. § 201. [Definitions.]] as defined under the Hawaiian Homes Commission Act of 1920, or to continue to be treated as “wards” of the state of Hawaii, nor to be identified as part of the</p>	



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		<p>only ethnic identity in the United States of America, where local and state government officials claim to hold the unfettered ability to ‘regulate’ fundamental human liberties of ‘subsistence’ as well as their ‘cultural and religious’[13 The State reaffirms and shall protect all rights, customarily and traditionally exercised for subsistence, cultural and religious purposes and possessed by ahupua`a tenants who are descendants of native Hawaiians who inhabited the Hawaiian Islands prior to 1778, subject to the right of the State to regulate such rights. [Add Const Con 1978 and election Nov 7, 1978] Section 7. TRADITIONAL AND CUSTOMARY RIGHTS, Article 12. State of HawaiiConstitution.], practices?</p> <p><u>Foreground:</u>                      When any purported landowner such as the state of Hawaii intends to remove anyone in ‘possession’ of land, even if they are ‘entitled to the possession of the premises’ they ‘shall bring and prosecute the person’s action in the district court of the circuit wherein the lands and premises in question are situated.’ [14 SECTION 940. ARTICLE XL.OF. SUMMARY PROCEEDINGS TO RECOVER POSSESSION OP LAND IN CERTAIN CASES. The Civil Codes of the Hawaiian Islands, 1859, [Recognized as “§666-1 HRS Summary possession on termination or forfeiture of lease.”]] and if it ‘shall be proved to the satisfaction of the justice, that the plaintiff is entitled to the possession of the premises he shall have judgment for the possession thereof’[15 SECTION 943. ARTICLE XL.OF. SUMMARY PROCEEDINGS TO RECOVER POSSESSION OP LAND IN CERTAIN CASES. The Civil Codes of the Hawaiian Islands, 1859, [Recognized as §666-11. HRS Judgment; writ of possession.]], this provides each of the parties “due process” of law. If the purported landowner prevails, the court will issue a “Writ of Possession”, and law enforcement officers may remove the tenants in possession.</p> <p><u>Deprivation of due process:</u>                      The BLNR utilized the ‘color’ of HRS 708.814.5 [16 HRS §708-814.5 Criminal trespass onto public parks and recreational grounds. CHAPTER 708</p>	

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		<p>OFFENSES AGAINST PROPERTY RIGHTS], as the authority to forcibly remove the tenants. The foundational unresolved matter is whether or not their possession was “lawful”, or if they were in possession ‘unlawfully’ [17 §708-814.5 HRS Criminal trespass onto public parks and recreational grounds. (1) A person commits the offense of criminal trespass onto public parks and recreational grounds if the person remains unlawfully in or upon a public park or recreational ground after a request to leave is made by any law enforcement officer, when the request is based upon violation by the person of any term of use specified on a sign or notice posted on the property, or based on violation of any term of use contained in, or the expiration of, any permit relating to the person's presence on the property]. In this case, the lawfulness of the tenant's possession must be determined by a court of law, before HRS 708.814.5 becomes applicable. Under duress and the threat of being arrested for “criminal trespass” and taken against their will, the tenants had agreed amongst themselves that they would not want to subject the entire group to the trauma of forcefull arrest and detainment. They pre-agreed amongst the members of the group that only two of the tenants, Louise H. Oclit and Uilani Manoi would remain there and watch over their personal property. Thus, on July 6, 2021, both tenants were taken into custody and separated from their dwellings and personal belongings of the group as a whole. Initially the two had thought they were being arrested on charges of trespass and cited for a criminal violation of law, which would have afforded them an opportunity to pursue the land title issue and other controversies through judicial process. However, instead of arresting Louise H. Oclit and Uilani Manoi for criminal trespass, as the BLNR Notice to Vacate had threatened, they were issued a citation for violating a BLNR administrative rule ‘HAR 13-221-4. Closing of areas.’, which is an administrative violation, absent any criminal ‘penalties’ [18 HAR §13-221-3 Penalties.].</p> <p>Both tenants were required to appear in the Kauai District Court on August 18, 2021, and on that day all charges were dropped by the</p>	

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		<p>Kauai County prosecutors at the hearing and dismissed without prejudice, leaving open the threat for their future prosecution. The facts are clear and unambiguous, that the BLNR used the color of law, to deny and to remove the tenants whose civil rights were vested in law, being designated under “Hawaiian National usage”, by a manner in which law enforcement resources were used to levy trumped-up charges.</p> <p>Simply put, the politically appointed BLNR and county of Kauai officials do not have lawful authority to arbitrarily skirt judicial scrutiny in these matters, as well as constitutional mandates of judicial oversight and of due process, prior to depriving the native tenants of property rights. As a matter of law, to uphold the principles of a civilized law abiding society, the government officials in the Hawaiian Islands, being a part of the People/citizenry of the United States subdivision aka state of Hawaii, under the adoption of the U.S. Federal Constitution, have sworn an oath to “support and defend” both the United States and state of Hawaii constitutions, which requires them to ensure the native tenants due process of law.</p>	
Liko Martin		<p><b>COUNT 2</b>  <u>‘Conspiracy’[19 TITLE 18, U.S.C., SECTION 241]</u>  <u>to deprive of vested property rights held by ‘native tenants’ under ‘color of law’</u>  <u>by the BLNR and county of Kauai.</u></p> <p>It appears to be an obvious ‘conspiracy’ between members of the BLNR and county of Kauai officials to deny Louise H. Oclit and Uilani Manoi, and other native tenants (as members of their group) residing in Hanapepe of their personal and vested right to ‘property’ without ‘due process of law’ and ‘equal protection of laws’[20 Amendment XIV. Section 1. United States constitution.]. Prior to June 6, 2021, the Board of Land and Natural Resources (“BLNR”) posted a “Notice to Vacate” (Exhibit “A”) in the area previously designated as a public park, where many homeless and other displaced persons had been allowed to reside until they could receive assistance with relocation and other social services.</p>	Please see General Response.

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		<p>Other notices to vacate had been strategically placed in the Hanapepe park area, advising other persons of being subjected to arrest for criminal trespass, prior to July 6, 2021, citing the “color” of HRS 708.814.5 [21 HRS §708-814.5 Criminal trespass onto public parks and recreational grounds. CHAPTER 708 OFFENSES AGAINST PROPERTY RIGHTS], as well as Kauai County Code 19-1.5 [22 Kauai County Codes Sec. 19-1.5 Operating Policy. (a) Parks shall be open to the public every day of the year during the designated hours unless closed for good cause by the Director. The opening and closing hours of each park and recreation facility shall be posted therein. (b) Any section or part of any park or recreation facility may be declared closed to the public by the Director at any time, as the Director shall find reasonably necessary for the health, safety or welfare of the public. (Ord. No. 383, April 30, 1980; Ord. No. 852, July 1, 2007)], that violations of those laws and codes; could lead to their arrests, the ;possibility of being taken against their will, and sanctioned with criminal fines. As far as is known, only Louise H. Oclit and Uilani Manoi, acting in good faith, as is their right, after receiving the Notice to Vacate, and being under the ‘imminent danger of eviction’[23 “A tenant may not deny the title of his landlord and attorn to another unless he is actually evicted or at least in imminent danger of eviction’ Kamauleule vs. Nagamoto 9 H. 384 (1904)], promptly responded and served the BLNR and county of Kauai officials a document (Exhibit “A’) effectively challenging the assertion that the “state of Hawaii owned the land”, and provided the legal authorities that their rights were vested in law, as being a basic condition on the title, as that applies to/for any and all purported landowners, including the state of Hawaii.</p> <p>Despite their due diligence to protect their inherent rights in”the national lands”, (See U.S.P.L. 103-150), their personal property was maliciously taken and deposited at the local refuse station and has not been accounted for. The dwellings where they lived were bulldozed and the remnants of those structures are still remaining in a pile of rubble.</p> <p>(It should be noted on August 6, 2021, that another notice to vacate</p>	

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		<p>was placed throughout the area, by the SOH Department of Transportation. Soon after that about a hundred people, who had fled from the park area, and had found shelter in the adjacent area were forced to flee due to the unannounced controlled fire that was set by local government officials. The park which technically is part of the crown lands of Hanapepe, is under management by the County of Kauai, who used the color of “HRS 708.814.5” and an administrative rule ‘Title 19-14-3.2’ Prohibited activities, to displace the people and it remains unclear as to how this rule is applicable, as there is no “public airport” on the land they are now in possession of.</p>	
Liko Martin		<p><b>COUNT 3</b>  <u>A long-term pattern and practice of ‘Genocide’ [24 Title 18 U.S. Code § 1091 - Genocide] through selective enforcement of law by the executive branch of the state of Hawaii.</u> The United States government has fully informed the state of Hawaii executive branch through investigative Reports and studies as far back as 1983 [25 Native Hawaiians Study Commission, 1973 - 1985: Native Hawaiian Claims] of the genocidal effect of its mistreatment of the Hawaiian people, yet it continues unabated. Governmental agencies like the BLNR, according to the state of Hawaii Auditor in 2019 are <b>‘conducting operations as a private landowner... land dispositions have been arbitrary... and the Land Division has not demonstrated that its actions have always been in the best interests of the State’</b> [26 ‘...the Land Board and the Land Division have struggled with carrying out their fiduciary responsibilities and conducting operations as a private landowner seeking to increase revenue. Decisions regarding land dispositions have been arbitrary, and the Land Division has not demonstrated that its actions have always been in the best interests of the State’ [Report No. 19-12 / June 2019 page 41]] ?  The executive branch of the state of Hawaii continues its attempts to destroy the ‘national’ [27 Title 18 U.S. Code § 1091 – Genocide. (a.)] identity of the Hawaiian people, through unsuccessful attempts of lobbying the United States Government to recognize the</p>	Please see General Response.

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		<p>Hawaiian people as a subjective native American tribe, via legislation such as the “Native Hawaiian Government Reorganization Act’[28 Joint Resolution S.1011 - 111th Congress (2009-2010)]. Since the advent of the Hawaiian Kingdom in 1810 and all the way to 1893, there was no “native Hawaiian” government in the Hawaiian Islands.</p> <p>It is well documented that the effect of misapplication and unequal protection of the law such as removing the Hawaiian native tenants, without due process of law, continues to have a devastating effect. For several decades the BLNR and DLNR have been removing and displacing Hawaiians throughout the islands utilizing trespassing and camping laws, as documented above, without affording them due process.</p> <p>This recent incident involving native tenants and other persons is evidence of violations of U.S. Human Rights Treaty obligations (ICCPR, CERD, CAT and ROC) and the Federal law (U.S.P.L. 100-606, The Proxmire Act, Nov. 4, 1988, Pres. Ronald Reagan), relating to the prevention and punishment of crimes of ‘Genocide’ being committed by the BLNR in collusion with county officials, and it is unfortunate that the BLNR holds exclusive discretionary enforcement of laws and rules. Records exist that reveal a systemic lack of compliance with or enforcement of those laws and failure by local county governments to comply with those laws, which intentionally has created conditions that have resulted in the destruction of the Hawaiians, and their places dedicated to culture, science and religion that are a vital part of their national identity and sense of place.</p> <p>The effect has been for decades that the BLNR and counties have allowed the destruction of hundreds if not thousands of Hawaiian village sites and ‘places of worship’ throughout the islands, often to support private, and for profit land developments.</p>	
Liko Martin		<p><b>COUNT 4</b>  <u>Governmental waste, abuse, and a broader ‘Conspiracy’ of deprivation of civil liberties.</u>                      It has been widely reported that as a direct result of an ‘Emergency</p>	Please see General Response.

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		<p>Proclamation for Mauna Kea’ issued on July 17, 2019, the governor of the state of Hawaii has reportedly appropriated more than \$11,000,000 of state and possibly private and federal funds on these unnecessary law enforcement activities.</p> <p>No greater example of abuse of power and unlawful conspiracy can be documented than by the recent events on the Island of Hawaii on the ‘public trust’[29 The project area for the proposed development on Mauna Kea is located within the ahupuaa of Kaohe, which is listed as government lands, transferred to the United States by the Republic of Hawaii in 1898] land of Mauna Kea. For decades there have been multiple governmental reports, mainly from the state of Hawaii Auditor, that document multiple instances of ‘places of worship and burials’ [30 See §711-1107 HRS Desecration. (b) A place of worship or burial.] being ‘desecrated’. There are no records of virtually any enforcement acts by the BLNR/DLNR, despite years of formal complaints to those agencies.</p> <p><u>Background</u></p> <p>In 1998 the state of Hawaii Auditor reported that as ‘...early as 1986, the Department of Land and Natural Resources made an effort to place historic resources on Mauna Kea’s summit on the State and National Registers of Historic places’, but after concerns were expressed by the developers <b>‘that control of development on the summit would be transferred from the State to the federal level and threaten development of the summit...’</b> It appears historic places, including but not limited to places of worship, and burials on Mauna Kea were deliberately excluded from state and federal protections.</p> <p>The auditor also reported ‘...there is community concern for the lack of recognition for cultural or religious sites on Mauna Kea’.[31 Audit of the Management of Mauna Kea and the Mauna Kea Science Reserve. A Report to the Governor and the Legislature of the State of Hawai`i. Report No. 98-6 February 1998, page 22-23, respectfully.]</p> <p>In 2014 after the BLNR approved building permits, it announced that construction of a private telescope, the largest project of its</p>	

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		<p>kind in the world, would commence. As a result, Hawaiians and their supporters after years of protective efforts and frustration over the long standing mistreatment of burials and religious sites, gathered in mass, in civil protest and peaceful assembly[32 ‘All men shall have the right, in an orderly and peaceable manner, to assemble, without arms, to consult upon the common good, and to petition the King or Legislature for redress of grievances.’ ARTICLE 4. Constitution of the Hawaiian Kingdom. (1887)] on Mauna Kea, in keeping with the theme of “Kapu Aloha”, simply meaning anyone involved must remain peaceful. The effect of that peaceful assembly resulted in the delay of the start of construction of that private development project for several years.</p> <p>Subsequent to that delay the Board of Regents of the University of Hawaii at Manoa gave notice of its intent to fabricate rules regarding access and use of the summit area of Mauna Kea, and once again despite overwhelming and widespread opposition expressed by Hawaiians, rules were put in place that severely restricted access to natural resources or use for religious and other purposes. Additionally the BLNR created a new emergency administrative rule, in spite of overwhelming public opposition, that had a chilling effect on Hawaiians and their supporter’s ability to peacefully gather on Mauna Kea, but fortunately in October of 2015, the Third Circuit Court invalidated the emergency rule, and dismissed criminal charges against Hawaiians and their supporters. In December of 2015 the Supreme Court in Hawaii, during a contested case proceeding before the BLNR, ruled that when the Board of Land and Natural Resources approved a key building permit for the proposed telescope (TMT), it had deprived Hawaiians and their supporters the ‘guarantee of due process’ [33 ‘The question we must answer is whether the approval of the permit before the contested case hearing was held violated the Hawaii Constitution’s guarantee of due process, which provides that, “No person shall be deprived of life, liberty or property without due process of law . . . .” Haw. Const. art. I, § 5. We hold that it did...Opponents included Native Hawaiians who stated that the</p>	



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		<p>summit area was sacred in Native Hawaiian culture and that the construction of the eighteen-and-one-half-story high observatory would be a desecration. MAUNA KEA ANAINA HOU et.al. v. BOARD OF LAND AND NATURAL RESOURCES et. al., OPINION OF THE COURT BY RECKTENWALD, C.J. SCAP-14-0000873, DECEMBER 2, 2015]. So, in June of 2019, after a new contested case hearing approved the development, Hawaiians and their supporters began to peacefully assemble on Mauna Kea.</p> <p>On July 17, 2019, under an “Emergency Proclamation” issued by the governor of the state of Hawaii hundreds of law enforcement officers from various jurisdictions from around the Hawaiian Islands and elements of the national guard moved into position. Those armed forces had been given extraordinary martial law type powers granting them the ability to order the “mandatory evacuation of the civilian population to ensure the execution of the law and suppress or prevent lawless violence, riot, and forcible obstruction of the laws.”. Yet there had never been any factual evidence produced to support the governor’s claims, nor has there ever been provided an opportunity for a judicial review of that action.</p> <p>So, on July 17, 2019, thirty-eight Hawaiian elders, including myself, were arrested and cited for alleged violations of §711-1105 Obstructing. (1), (a) ‘Obstructs any highway or public passage’ which is a ‘petty misdemeanor’. The majority of those arrested were lifelong advocates for preventing acts of desecration, protecting sacred Hawaiian places and upholding vested Hawaiian civil rights.</p> <p>On August 6, 2021, after nearly two years of aggressive prosecution by the state of Hawaii Attorney General’s Office, the District Court in Hilo ruled that the first set of elders to be prosecuted, were not guilty of ‘Obstructing’ a ‘highway or public passage’, but prosecutions will continue because a state of Hawaii official, who was under oath and had only mistated that the state did not have the necessary permits required to proceed with construction. The Attorney General’s office has been quoted in the media as saying that it intends to “vigorously” prosecute them for the exact same</p>	

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		<p>criminal charges.                      Evidence of selective enforcement of law can be found in the fact that both the ‘desecration’ law, as well as ‘Obstructing’ fall under ‘CHAPTER 711. OFFENSES AGAINST PUBLIC ORDER’, acts of ‘desecration’ carry with it serious criminal and civil penalties [34 (3) Any person convicted of committing the offense of desecration shall be sentenced to a term of imprisonment of not more than one year, a fine of not more than \$10,000, or both.], acts of “obstructing” are a petty misdemeanor.</p>	
Liko Martin		<p><b>COUNT 5</b>  <u>Breaches of Trust by the Board of Land and Natural Resources</u> [35                      What is the Board of Land and Natural Resources?                      The BLNR consists of seven politically appointed members who are nominated by the governor of the state of Hawaii, and confirmed by its legislature, Overview of its Functions: Oversees management and control over of virtually every aspect of the approximant 1,800,000-acres of ‘government and crown lands’...belonging to the Government of the Hawaiian Islands’, upon the ‘transfer’ of those lands by ‘Republic of Hawaii’ , to the United States of America in 1898; Both the management of ‘crown and government’ lands are held as a ‘public trust’ , and it is the ‘public policy’ of the people of the Hawaiian Islands that enforcement of Historic Preservations laws is held for ‘future generations’ (of note as a condition of receiving U.S. Federal Grants, the DLNR is mandated to also comply the standards of the national historic preservation laws of the United States of America.) The BLNR is the agency that issues and approves development permits on the ‘public trust’ lands, in most cases for private land developers for projects such as the TMT telescope of Mauna Kea. The BLNR has a long pattern and practice of utilizing government law enforcement to support and defend those permits issued to those private developers.] <u>and the state of Hawaii</u>                      The ‘public trust’ lands that were “transferred”, by the Republic of Hawaii and ‘are primarily under the control of the Board of Land and Natural Resources, with the stipulation that the ‘proceeds, and</p>	Please see General Response.

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		<p>income shall be managed and disposed for the foregoing purposes[36 UNDER THE ADMISSIONS ACT of 1959, revenue from ceded lands is held by the State as a public trust for the following specific purposes: (1) support of public education; (2) betterment of the conditions of Native Hawaiians; (3) development of farm and home ownership; (4) public improvements; and (5) provision of lands for public use.]... their use for any other object shall constitute a breach of trust for which suit may be brought by the United States’[37 ‘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’ § 5. (f) THE ADMISSION ACT.]</p> <p>A ‘report’ by the state of Hawaii Auditor that examined the BLNRs’ ‘Special land and development fund’ (SLDF), indicates that the BLNR’s Department of Land and Natural Resources (DLNR), had retained 58 percent (\$27.2 million) of the public trust revenues for its own programs. The Auditor indicated that ‘The department’s presentation of revenue numbers for the past nine years – absent any detail or context – is purposely misleading and not an indicator of the quality of the Land Division’s management of the fund or its land portfolio.’[38 State of Hawaii’s Auditors Report No. 19-12 / June 2019 page 51] The Auditor questioned if the ‘... DLNR is superseding the Legislature’s power to decide the appropriate use of ‘ceded lands’[39 The term “ceded lands” is often used in Hawaii to refer to the lands “transferred” by the Republic of Hawaii to the United States of America, and later transferred to the state of Hawaii. No records exist that there was any cessation, lawful conquest, or compensation to owners of those ‘private’ lands, or ‘crown lands’ portion of the ‘public trust’ lands held by the state of Hawaii. Even if there was a lawful conquest of the Hawaiian Kingdom Monarchy, only the “government” lands of the Hawaiian Kingdom could be part of an alleged conquest.] ‘revenues.’[40 State of Hawaii’s Auditors Report No. 19-12 / June 2019 page 39] , and</p>	

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		<p>that those ‘revenues, are the purview of the Legislature – not an individual agency’ and further questioned if the BLNR/DLNR can keep or spend ‘revenues without specific Legislative approval to do so’, and that the ‘DLNR – not the Legislature – has assumed the State’s fiduciary responsibility to decide how to use the ceded lands revenues’ [41 State of Hawaii’s Auditors Report No. 19-12 / June 2019 page 39]. The Auditor also pointed out the probability of corruption by members of the BLNR ‘The Land Board member is a former legislator who represented the Hilo district, and he told us that some of the KIA lessees are former political supporters and close friends.’ [42 State of Hawaii’s Auditors Report No. 19-12 / June 2019 page 49], and also how the BLNR/DLNR ‘incorrectly contends that the enactment of laws allowing for the extension of leases demonstrates legislative intent that it is in the public interest to retain existing KIA tenants to the greatest extent feasible, rather than allowing leases to expire and seek higher rents’ [43 State of Hawaii’s Auditors Report No. 19-12 / June 2019, page 50] While the Auditors Report was limited to the SLDF, in a May 5, 2020 ‘Summary of Receipts from Lands Described in Section 5(f) of the Admissions Act by Department For Fiscal Year 2019’ the report indicates the Gross Receipts from the public trust lands were ‘\$289,767,656.68’ [44 Page 6 of 6]</p> <p>We do not agree with any revenues from the public trusts lands being transferred to the state of Hawaii controlled agencies such as the Office of Hawaiian Affairs that purports to function ‘for the betterment of ‘native Hawaiians’. These revenue disbursements are theoretically based on the 2019 Gross Receipts, by which each of the five purposes should have received equal shares, or about \$58,000,000 each; in 2019, the Office of Hawaiian Affairs received less than \$15,000,000.</p> <p>Another paramount concern is with regards to one of those five public trust purposes, namely ‘the development of farm and home ownership on a widespread basis’. [45 §5. (f), AN ACT TO PROVIDE FOR THE ADMISSION OF THE STATE OF HAWAI’I INTO THE UNION, ACT OF MARCH 18, 1959, PUB L 86-3, 73 STAT 4.], and where those</p>	

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		<p>revenues are being directed. The reason being that, as prescribed by Hawaiian National usage, there is already an existing system for homesteading that is in place to facilitate the housing needs and stabilization of Hawaiians onto good farmlands, rather than be subjected to discrimination under the system of involuntary servitude that is reflective of the 100 year failings of the Hawaiian Homes Act of 1920, as Amended. One can easily see the reasoning behind the SOH aggression, persecution, and the continuing brutal harassment of Hawaiians, when they attempt to exercise their vested rights as native tenants, as prescribed by Hawaiian National usage.</p> <p>The United States must remain cognizant of the fact that. International Human Rights Treaties have outlawed ‘apartheid’ as well as ‘slavery’ and it would be advisable for the Executive Branch of the United States Government to heed the warnings of U.S. permanent representative to the United Nations, Jeanne Kirkpatrick, who in 1986 before the U.S. Senate Committee on Foreign relations, spoke on the importance of the United States disengaging from its “genocidal policies”, rather than face the “scorn” of the international community and condemnation by Members States of the United Nations and that organization’s attempts to thwart and prevent the proliferation of the crimes of genocide. Undeveloped crown lands such as the ahupuaa of Hanapepe, and others throughout the Hawaiian Islands are there to be utilized as an alternative for Hawaiians to obtain ‘for development and home ownership’, especially under the light of the approximate \$58,000,000 annual revenues generated for this purpose, from the public trust lands.</p>	
Liko Martin		<p><u>Disappearing public trust lands?</u></p> <p>The state of Hawaii Auditor also brought forward substantive issues of what happened to ‘the approximately 1.8 million acres of land that were transferred’, to the United States by the Republic of Hawaii in 1898’, indicating that as of May 5, 2020, approximately 500,000 acres had disappeared from the public trust, leaving a current inventory of only ‘1,283,766.543 acres’ [46 Page 6, COVID-</p>	Please see General Response.

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		<p>19 Report No. 20-07 / May 2020, state of Hawaii Auditors Review of the Department of Land and Natural Resources’ Special Land Development Fund].</p> <p>Prior to our advocacy for the native tenants of Hanapepe, members of our organization, ‘The Hawaiian Law Foundation’[47 The Hawaiian Law Foundation is a not-for-profit, Non-Governmental-Organization (NGO) formed in 1997, after extensive consultation with Hawaiian kupuna (elders), and other community stakeholders in Kailua-Kona on the island of Hawaii. Our primary function has been research and sharing the laws of the Hawaiian Islands in-effect on, and prior to January 17, 1893. In 1998 we worked with senior staff with the U.S. Interior and Justice Departments in forming a report entitled “From Mauka to Makai, the River of Justice Must Flow Freely”. Our strategy has been to work with lawyers in the courts of Hawaii to explore the limits of the laws of the Hawaiian Islands, so far, we have not found any limits in the Hawaiian Islands. We do not profess to be part of any so-called “sovereignty” group, we fully support and have faith in the honor of the American people, and the ongoing attempts by the government of the United States of America show compassion for our people.</p> <p>We continually uncover the deep and shocking levels of private and governmental corruption in our islands, and have faith the government of the United States of America will finally help bring justice for the Hawaiian people, by keeping its citizens in Hawaii, in compliance with the constitutional principles it is founded in.] were requested to intervene in a matter before the state of Hawaii Land Use Commission on the island of Kauai.</p> <p>This situation involved a land developer from outside of Hawaii, who had purchased a parcel of land, hoping the LUC would change the agriculture/conservation zoning restrictions on that land in order to accommodate a high-density condominium type multi-family development.</p> <p>In that recent case Liko-o-kalani Martin was the sole intervenor and stipulated that the lands in question were the “crown lands” of Kapa’a. The American developer had purchased an interest in a</p>	

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		<p>portion of that land in 2013 in good faith at a foreclosure sale for about \$6-million, and obtained a “Commissioner’s deed”, which could make no representation or guarantees as to the condition of the land title. During the LUC (SOH Land Use Commission hearing process, and the fact that the land was part of the crown lands came into the forefront. As a result of multiple misrepresentations made during the months-long/ hearings, the developer withdrew its petition for rezoning, and was left with an uncertain ability to ever be able to obtain clear title or to develop that portion of the “crown lands” affording any type of fee-simple interest.</p> <p>After research it was discovered that the 97 acre development parcel was actually part of the 5,337 acres within the crown lands of Kapa’a, that was initially under a lease agreement executed with the Commissioners of the Crown Lands in 1877,[Exhibit B] and was set to expire in 1907. One would assume that those lands were included in the inventory of the crown lands purportedly transferred to the United States of America in 1898, but no records can substantiate that they are. Furthermore, research revealed that the 1877 lease of Kapaa to Makee Sugar also included the crown lands of Anahola, which together encompass more than 12,000 acres, all of which do not appear on the SOH inventory.</p> <p>Further discoveries reveal that through a series of transactions, those leasehold interests were transferred to American Factors (AMFAC) in about 1914. Then in 1997, when AMFAC began selling off those lands, it apparently represented that it held a fee-simple interest. No government records can be located at this time indicating or substantiating the conversion of title from leasehold, into fee-simple, nor have any apparent government records of the revenues generated by the sale of those ‘public trust’ lands, been located to indicate that the sale of those trust lands benefited the public trust fund. Several years later, AFMAC filed for bankruptcy, which may have been an attempt to shield itself from liability related to those and other leased lands that it had used for sugar production. We find it highly notable, that every purchaser from the date of the first transaction in 1997, from AFMAC, in the crown</p>	

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		<p>lands of Kapa’a and Anaola, apparently was not able to obtain clear title to the land, including the developer attempting to rezone the land before the LUC in 2021.</p> <p>Resolution of these issues is obviously of great importance to any prospective purchaser of the ‘public trust’ lands in the Hawaiian Islands, and should of grave concern for the United States with respect to the legal consequences and liabilities regarding the non existence of any formal treaty of annexation of the Hawaiian Islands from the lawful Hawaiian Kingdom Government since January 17,1893, and the blatant mistreatment of Hawaiians, by the enforcement of policies of apartheid, similar to those that existed in 1960, when the United Nations, International Court of Justice ruled that the government of South Africa had to be removed.</p> <p>We have also discovered a pattern and practice of private parties, in at least two instances, one on Kauai, the other on Hawaii Island where parties purchased an interest in ‘available sugar lands’, who may have discovered the chain of title was dubious at best, took action to re-sell portions of those lands back to state or county governments, in both cases partially utilizing U.S. Federal grant funding.</p>	
Liko Martin		<p><b>COUNT 6</b>  <u>The perpetuation of the fraud whereby the constitutional government was overthrown.</u></p> <p>Many Hawaiians have recently become aware, and made a choice, in an exercise of their inherent rights of ‘self-determination’ [48 ‘All peoples have the right of <b>self-determination</b>. By virtue of that right they freely determine their political status and freely pursue their economic, social and cultural development. PART I. Article 1. International Covenant on Civil and Political Rights. Adopted and opened for signature, ratification and accession by General Assembly resolution 2200A (XXI) of 16 December 1966 entered into force 23 March 1976, in accordance with Article 49.], to place their ‘nationality’ [49 Article 15. 1. Everyone has the right to a nationality. 2. No one shall be arbitrarily deprived of his nationality nor denied the right to change his nationality. United Nations Universal</p>	Please see General Response.



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		<p>Declaration of Human Rights], within and under the protection of the constitution and laws of the Hawaiian Islands, prior to the January 17, 1893 incident, more importantly ‘prior to November 25, 1892’[50 "Hawaiian usage" must predate November 25, 1892. 58 H. 106, 566 P.2d 725.].</p> <p>Despite the foundational laws of the state of Hawaii, recognizing an exception to its laws as ‘fixed by Hawaiian judicial precedent, or established by ‘Hawaiian usage’[51 See §1-1 HRS. Common law of the State; exceptions.], the lawful Government of the Hawaiian Kingdom in the Hawaiian Islands has an extensive system of Civil and Penal codes. All the English versions of those laws are now available on the internet.[52 See www.llmc.com, click on “open access”, use the search term “Hawaiian Kingdom”] The Congress of United States has resolved and answered any outstanding political questions related to the formation of the Republic of Hawaii/Provisional Government, as being “illegal”, given the events of the January 17, 1893 incident in the Hawaiian Islands, and the so-called “overthrow” , by way of U.S.P.L. 103-150, that characterized those events as being, ‘in violation of treaties between the two nations and of international law’.[53 Whereas, the United States Minister thereupon extended diplomatic recognition to the Provisional Government that was formed by the conspirators without the consent of the Native Hawaiian people or the lawful Government of Hawaii and <b>in violation of treaties between the two nations and of international law</b>; (U.S. Pub. L. No. 103-150, 107 Stat. 1510)] and further, committed the United States of America ‘to acknowledge the ramifications’ [54 (4) expresses its commitment to <b>acknowledge the ramifications</b> of the overthrow of the Kingdom of Hawaii, in order to provide a proper foundation for reconciliation between the United States and the Native Hawaiian people; (U.S. Pub. L. No. 103-150, 107 Stat. 1510) ], without limiting or defining those “ramifications”. The Executive branch of the state of Hawaii continues to support and defend the actions of the Republic of Hawaii/Provisional Government as being lawful, and continues to</p>	

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		<p>treat the Hawaiian people as its wards, or some sort of conquered native American tribe.</p> <p>The Executive branch of the state of Hawaii continues the “...perpetuation of the fraud whereby the constitutional government was overthrown...”, as stated by Queen Liliuokalani in her formal diplomatic protest filed at the U.S. Department of State on June 17, 1897, in order to thwart the attempted annexation of the Hawaiian Islands by way of a treaty promulgated by the treasonists who conspired to take over control of the Hawaiian Islands and its government. It should be noted that during the October 23, 1993 Senate debate concerning the situation of the Hawaiian Islands, that the Hawaii delegates failed to respond to requests from Senators regarding the workings of this apology, and questions as to what the ramifications would be, so that Senator Gorton, near the end of the debate, made the following statement that “the only logical conclusion of this resolution is independence”. The badges of ongoing fraud can be found in the state of Hawaii foundational defenses that the laws of the Hawaiian Islands, prior to January 17, 1893, no longer have any force or effect due to the state v. Lorenzo[55 77 Hawai’i 219, 883 P.2d 641 (1994)] case, where one defendant simply failed to meet his burden, in a District court during trial, to present evidence to the court of the continued force and effect of Hawaiian Kingdom laws. The courts of Hawaii continue to far exceed their jurisdiction, when they continue to address and use the “political question”, in favor of the state of Hawaii, which is in direct contravention to the answers to those political issues, made by the United States Government.</p> <p>The executive branch of the state of Hawaii’s ongoing attempts to subject Hawaiians to them and its jurisdiction, and disregarding those members of the national group, who have formally placed their nationality under the laws of the Hawaiian Islands ‘prior to November 25, 1892’, and it is with deep concern that that attitude, is an action clearly intended to support inciting the commission of the crime of genocide because that imposition is made ‘with the specific intent to destroy that group possessing that “national</p>	

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		<p>origin”, in whole or in substantial part’. The continued persecution of Hawaiians by way of political crimes in the domestic laws, because of their “national origin”, is blatantly in violation of the laws of the Hawaiian Islands, an affront to the international jus cogen norms, the Rome Statute of the International Criminal Court (ICC), as well as treaties and laws of the United States of America. <u>Standing treaty obligations by the United States of America, and its public officials to the Hawaiian people.</u></p> <p>There appears to be definitive ramifications in the Hawaiian Islands from the recent ruling by the United States Supreme Court in <i>McGIRT v. OKLAHOMA</i>, coupled with the admitted facts of Treaty violations by both the Executive Branch of the United States on December 18, 1893 via the ‘...act of war, committed with the participation of a diplomatic representative of the United States and without authority of Congress...’, and the affirmation in 1993 by the United States Congress within the Apology Law of the "act of war, committed with the participation of a diplomatic representative of the United States and without authority of Congress"</p> <p>[56 (U.S. Pub. L. No. 103-150, 107 Stat. 1510)] The Hawaiian Islands and the Hawaiian people continue to be under the protection of those treaty relations, holding steadfast with the desire to return back to <b>‘perpetual peace’</b>[57 ‘Article I. There shall be perpetual peace and amity between the United States and the King of the Hawaiian Islands, his heirs and his successors.’ Treaty of Friendship, Commerce and Navigation, Treaty signed at Washington December 20, 1849, Senate advice and consent to ratification January 14, 1850, Ratified by the President of the United States February 4, 1850. Ratified by the Hawaiian Islands August 19, 1850, Ratifications exchanged at Honolulu August 24, 1850, Entered into force August 24, 1850] with the people of the United States of America, as promised in that sacred contract.</p> <p>There are no records of the contracting parties, the United States of America, nor His Majesty the King, or Queen of the Hawaiian Islands, or their lawful successors, formally abrogating or</p>	

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		<p>terminating their binding treaty [58 Treaty of Friendship, Commerce and Navigation, Treaty signed at Washington December 20, 1849,] obligations between each other. There are no records of a treaty of peace [59 ‘Thus, a third party cannot safely purchase a conquered town or province, till the sovereign from whom it was taken has <b>renounced it by a treaty of peace</b>, or has been <b>irretrievably subdued</b>, and <b>has lost his sovereignty</b>: for, while the war continues, — while the sovereign has still hopes of recovering his possessions by arms, — is a neutral prince to come and deprive him of the opportunity by purchasing that town or province from the conqueror? The original proprietor cannot forfeit his rights by the act of a third person; and if the purchaser be determined to maintain his purchase, he will find himself involved in the war. Thus, the king of Prussia became a party with the enemies of Sweden, by receiving Stettin from the hands of the king of Poland and the czar, under the title of sequestration. 5 But, when a sovereign has, by a definitive treaty of peace, ceded a country to the conqueror, he has relinquished all the right he had to it; and it were absurd that he should be allowed to demand the restitution of the country by a subsequent conqueror, who wrests it from the former, or by any other prince, who has purchased it, or received it in exchange, or acquired it by any title whatever.’ § 198. How to transfer them validly. CHAP. XIII. OF ACQUISITIONS BY WAR, AND PARTICULARLY OF CONQUESTS. Book III, OF WAR, — ITS DIFFERENT KINDS — AND THE RIGHT OF MAKING WAR], between the lawful government of the Hawaiian Islands, the Republic of Hawaii, or the United States of America. There is ample historical evidence that the president (Cleveland) of the United States of America accepted Queen Liliuokalani’s January 17, 1893, conditional and temporary yield to the President, as the Commander in Chief, prescribing to the United States Constitution, under Article 3, Section 8, where in is addressed “Offenses against the ‘Laws of Nations’ [60 ‘...The United States has long recognized the responsibilities imposed upon individual nations by force of international custom and treats the Law of Nations as the law of the land.’ Kansas v. Colorado, 206 U.S.</p>	

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		<p>46, 97, 27 S. Ct. 655, 51 L. Ed. 956 (1907). United States v. Enger, 472 F. Supp. 490 (D.N.J. 1978), 504], which recognizes the temporary yield of Her Majesty Queen Liliuokalani, in order to “avoid bloodshed and prevent the collision of forces” as a ‘Treaty of Protection’. [61 ‘WHEN a nation is not capable of preserving herself from insult and oppression, she may procure the protection of a more powerful state. If she obtains this by only engaging to perform certain articles, as to pay a tribute in return for the safety obtained, — to furnish her protector with troops, — and to embark in all his wars as a joint concern, — but still reserving to herself the right of administering her own government at pleasure, — it is a simple treaty of protection, that does not at all derogate from her sovereignty, and differs not from the ordinary treaties of alliance, otherwise than as it creates a difference in the dignity of the contracting parties. Laws of Nations, Book I. CHAP. XVI. OF THE PROTECTION SOUGHT BY A NATION, AND ITS VOLUNTARY SUBMISSION TO A FOREIGN POWER. § 192. Protection.]]</p> <p><b><u>Part of the ‘ramifications’[62 SECTION 1. ACKNOWLEDGMENT AND APOLOGY. Congressional findings. (4) (U.S. Pub. L. No. 103-150, 107 Stat. 1510)] remains the absence of the formal abrogation of the treaties between the sovereign of the Hawaiian Islands and the United States of America, while the unresolving of the “act of war” perpetuates and ‘...breaks the bands of society and government...it produces in the nation two independent parties...two separate bodies, two distinct societies...’[63 ‘A civil war breaks the bands of society and government, or at least suspends their force and effect: it produces in the nation two independent parties, who consider each other as enemies, and acknowledge no common judge. Those two parties, therefore, must necessarily be considered as thenceforward constituting, at least for a time, two separate bodies, two distinct societies. Though one of the parties may have been to blame in breaking the unity of the state and resisting the lawful authority, they are not the less divided in fact. Besides, who shall judge them? Who shall</u></b></p>	

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		<p><u>pronounce on which side the right or the wrong lies? On earth they have no common superior. They stand therefore in precisely the same predicament as two nations, who engage in a contest, and, being unable to come to an agreement, have recourse to arms.’ Section 293. CHAPTER XVIII: Of Civil War. Law of Nations, BOOK III: Of War, CHAPTER I: Of War,—its different Kinds,— and the Right of making War.]</u>  <u>, in effect a protracted and continuing state of “civil war” in the Hawaiian Islands.</u>  <u>The people and government officials who have given their consent to be governed by the present system of governance in Hawaii (state of Hawaii), now being a political subdivision, are bound to uphold and abide by the foundational principles within the United States Constitution, in one most important aspect, that ‘all Treaties made, or which shall be made, under the Authority of the United States, shall be the supreme Law of the Land... any Thing in the Constitution or Laws of any State to the Contrary notwithstanding.’ [64 Article VI, Clause 2. United States Constitution]</u>  <u>A June 2001 Report[65 CONCLUSIONS AND RECOMMENDATIONS. SECTION 4. International solutions should be explored as alternatives to the recognition of a Native Hawaiian governing entity. Reconciliation at a Crossroads: The Implications of the Apology Resolution and Rice v. Cayetano...’] by the U.S. Commission on Civil Rights, Hawaii Advisory Committee, brought clarity as to the Ramifications of the Apology Law, S.J. Res. 19, 103d Cong., Pub. L. No. 103-150, 107 Stat. 1510, 1512 (1993): ‘The principles of self-determination and self-governance—which are consistent with the democratic ideals upon which our nation is founded—can only be meaningful if...Hawaiians have the freedom to examine diverse options for exercising the sovereignty that they have “never directly relinquished”’.</u></p>	
Liko Martin		<p><b>Therefore</b>, demand is hereby made to the government of the United States of America to immediately take the following actions:</p>	Please see General Response.

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		<p>1. Take any and all actions to provide restitution to, and immediately restore possession to the native tenants of Hanapepe identified herein, the possession of the lands they were forcefully removed from and prevent any harassment by governmental officials of the state of Hawaii and county of Kauai;</p> <p>2. Conduct an independent and comprehensive audit and inventory of all of the “crown” lands, including but not limited, as to the extent of any revenues generated, the exact locations, size and source of any purported land titles, either crown, or government lands;</p> <p>3. A forensic audit/investigation into how such ‘public trust’ revenues have been directed and utilized;</p> <p>4. A full investigation into breaches of trust by current and former members of the BLNR, and the state of Hawaii;</p> <p>5. A full investigation leading to the prosecution of those persons who violated the U.S. Federal Criminal Codes, as found in Title 18, including acts of genocide, civil rights, and other applicable criminal statutes;</p> <p>6. Enforcement of all standing treaty provisions between the government of the Hawaiian Islands (Hawaiian Kingdom) and the United States of America with respect to the present and future treatment of the native tenants of Hanapepe, and others so situated, in compliance with Hawaiian National Usage as prescribed by Hawaiian Law on November, 25, 1892.</p> <p>The <b>conduct alleged in the 30 August 2021 Complaint has not abated</b> since its initial advocacy, but rather risen dramatically to a level requiring a new dimension of advocacy, in order to establish a renewed level of recognition and respect for civil liberties, civil rights, vested rights in land, and lives of persons, family honors, cultural activities, traditions and lifestyles that are intrinsically inter-related to a multitude of historic places and natural resources essential to the Hawaiian people”.</p> <p>Formally submitted by Liko-o-kalani Martin on July 13, 2024, being a</p>	

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		living person, as part of the whole of the “chief governing authority”, under the provisions of United States Code TITLE 16, CONSERVATION, Part A- Historic Preservation Programs, in the non-contiguous Pacific Area of the Hawaiian Islands, Date: July 13, 2024	
Liko-o-kalani Martin		Okay. I was observing everything last night. This is relating specifically to the crown lands. The crown land title carried certain specific terms and conditions, including the fact that the fee simple interest is inalienable and private property of the royal domain of the Hawaiian Kingdom monarchy. The specific intent of the sovereign of the Hawaiian Islands was to protect those lands from being considered public domain and, "The danger of confiscation in the event of his lands being seized by any foreign power, such as the Republic of Hawaii or the United States of America." Legal expert for the United Nations, Professor de Zayas, in 2018 issued an unclassified memorandum to the United Nations through Secretary Guterres and all of the member states describing that situation in Hawaii as a nation state that is under a strange form of occupation by the United States resulting from an illegal military occupation and a fraudulent annexation, as such, requires that governance and legal matters must be administered by the application of the laws of the occupied state, not the domestic laws of the occupier, the United States; stating further that the ongoing plundering of Hawaiian Kingdom private lands by the legal systems of the United States and the state of Hawaii calls for an immediate investigation and intervention holding willful participants to be held accountable to us federal and international law. Professor de Zayas actually assisted in a call for review of historical facts surrounding UN General Resolution 1469, which recognized attainment of self-government for Hawaii -- big question mark. Revealing the deception that took place on the part of the United States in 1959 by intervention in the political affairs of the Hawaiian -- of the islands, by the imposition of an uncalled for and inexpedient assumption of a protectorate over the Hawaiian people by way of a provisional government instituted by the U.S. Congress by an act to provide for the admission of the State of Hawaii, placing the people	Please see General Response.



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		<p>of the Hawaiian Islands under a provisional government, aka State of Hawaii, not of their own choosing, being a military power against which they are powerless to protect themselves, and that while under this power, the Hawaiian people, despite the apology resolution, have not yet been afforded the opportunity to institute their own form of government. And these circumstances should not be regarded with indifference by the government of the United States or the United Nations. In closing, I wish that gentleman who spoke of Nazi Germany was here. But I'd like to read to you a situation I use to describe the underlying problem and situation in the Hawaiian Islands. There is no exaggeration made when recalling excerpts from the statements of Justice Robert Jackson before the international military trials at Nuremberg. One of the sinister peculiarities of society was that the state itself played only a subordinate role in the exercise of political power, while the really drastic controls over society were organized outside its nominal government. This was accomplished through an elaborate network of closely knit and exclusive organizations of selected volunteers, oath bound to execute without delay and without question the commands of the leaders. The country was subdivided into little principalities and every such community had its recognized party leaders, party police, and its undercover party spies. The whole formed a pyramid of power outside the law. The primary vice of this web of organizations was that they were used to transfer the power of coercing men from the government and the law. Liberty, self-government, and security of persons and property do not exist, except where the power of coercion is possessed only in the state and is exercised only in obedience to the law. Realistically, the apology resolution has not appeased the Hawaiian people, nor has it resolved the land issue or ended the cause for restoration of independence. Yet, it is remarkable that the native and part-native inhabitants of the Hawaiian Islands, despite the opposition, interference, and seemingly insurmountable odds, have through the last five decades arduously experienced a profound renaissance of culture, language, and political organizing and are deserving of</p>	

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		<p>reward. In recognition of the historic role of the United States to carry forth the mandate of the Treaty of Versailles by underwriting the formation of the operations of the United Nations at the end of World War II -- World War I, it is recalled that on the 9 December, the United Nations adopted the Convention on the Prevention and Punishment of the Crime of Genocide, being the first human rights treaty unanimously adopted by the General Assembly entering to force on the 12 January 1951. Yes, I am closing. Thank you. The Genocide Convention authorizes the mandatory jurisdiction of the International Court of Justice to adjudicate disputes, recalling that in 1960 the South African government was expelled from Namibia because it did not have a treaty of annexation and was found to be enforcing policies of apartheid by distinction, exclusion, restriction, and limitation based on national origin, race, color, ethnicity and religion, which parallels the current situation in the Hawaiian Islands. The United States became a signatory in 1986, codified the convention, and is known as the Proxmire Act. Thank you very much.</p>	
Liko-o-kalani Martin		<p>Aloha. Mahalo. Aloha. Thank you. Aloha. Aloha Liko, o wau, Kakuhihewa. September 30th, Ala Moana Hotel, Secretary Lujan came to have a conference under the US Public Law 99-239, Compact of Free Association Act. At that time, I stood before the body of these all-Pacific nation states, and shared the words of my - my kupuna teacher, who said to me, "Liko, what you don't need in the Hawaiian islands is a revolution. But you need to change a revolting situation, where the United States is protecting the fraud." Okay? After last night, and then watching the last two nights, I came to -- I got up this morning. I said, "Well, what else am I supposed to address?" And he told -- ohana told me, "Liko, you address the process. Call it for what it is, because it is a fraud." This -- this -- just this portion of the process is a war crime. And I'm going to qualify this. Apartheid is defined as a crime against humanity committed in the context of an institutional regime of systematic oppression and domination by one racial group over any other racial group or groups, and committed with the intention of</p>	Please see General Response.

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		<p>maintaining that regime. The explanation by the United States for not signing and ratifying the 1973 convention was that we cannot accept that apartheid can in this manner be made a crime against humanity, because crimes against humanity are so grave in nature that they must be meticulously elaborated. And I would like to elaborate briefly what that means. On August 27, the Senate, they had a hearing on the apology bill. Okay? This is apartheid. This is what we're dealing with. Okay? In response to concerns expressed by a delegation returning from Bosnia, Senator Inouye said, as I tried to convince my colleagues, this is a simple resolution of apology, to recognize the facts as they were 100 years ago. As to the matter of the status of native Hawaiians, as my colleague from Washington knows, from the time of statehood, we have been in this debate. Are Native Hawaiians Native Americans? This resolution has nothing to do with that. This resolution does not touch upon the Hawaiian homelands. I can assure my colleagues of that. It appears, however, that the simple apology had everything to do with the Hawaiian homelands. And the question lingers, though, as to why Senator Enoy emphatically insured his colleagues as to what the apology would not do. And why, then, in the aftermath of the -- the passage of the 1993 measure, did the activities of ward heelers aggressively pursue, in collusion with federal agency employees, including President Obama, political recognition for the beneficiaries under the apartheid race-based 1920 Hawaiian Homes Commission Act. And this is how we put definition into. We have to know who we've been called and what -- what is being put upon us. Okay? So what can we do? So there's this -- let me just -- just get -- okay. So.. [THE MODERATOR: Uncle, if you can please summarize. Thank you] What can you do? You folks can really do something to address this process. And I'm asking you to get in touch with the secretary of interior. And because the National Preservation Act -- under which your processing is under, Title 16, US Code, Conservation, Part A, Historic Preservation Programs -- I would sincerely appreciate if you can sequester the secretary of interior to come to the Hawaiian islands</p>	

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		<p>and qualify -- and what -- qualify the programs.· Okay? This is a really serious thing, because the state of Hawaii is the fraud.· They're representing themselves as a state historic preservation officer, but they are not in compliance with Executive Proclamation 3309 of Dwight D. Eisenhower, Requirement of Equal Footing, which requires the state of Hawaii -- which they have very rarely done --is to comply with the revised laws of 1955, with respect to the civil codes of the Hawaiian islands, so that the military here is following Geneva IV. This is what you can do.· I know you can do this.· And I'm going to put it in writing, as I've been putting it in writing for the last seven years.· And my mail seems to be getting interrupted. And that's why -- that's what I said today.· I had a notice.· I'm going to include it in there, because I know that you should do it and you can do it, because the process is flawed. You have the fraudulent state of Hawaii, like I mentioned last night.· There are this process.· It could be good, if you are following the -- the right rules and putting the people who need to be in power, who have the power, who hold the interest, who are the nationals of this land.· You can do this. And I've -- I've been communicating already with -- with -- you know, like I said, we're getting blocked.· And I thought, "Maybe this is the time."· Maybe you can bring it, instead of us being intercepted and the mail being intercepted, so we can make things start to be pono. And I really sincerely -- and I look forward to putting that -- inserting into. I thought I could get the signature tonight so that I could take that to -- maybe to the congress, and lay it before them.· But I'm bringing it -- I'm putting it in the record.· Because this will empower.· This will empower, and this is what you can do, is empower the process.· Thank you very much.</p>	
Martha Martin		I strongly oppose renewing	Please see General Response.
Chantelle Matagi		<p>‘Ano’ai, aloha mai iā tatou a pau loa. O wau ‘iho no ‘o Nakia Nae’ole, kahi ‘elele o ka hale mua o Ko’olauloa. the only men's group focusing on men's health within the Ko'olauloa region. I'm grateful to stand here tonight among many of my countrymen of Ko'olauloa kakou. I grew up in this hallowed hall of Kahuku</p>	Please see General Response.

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		<p>cafeteria, sat right here on these tables and played trumps with some of the best of friends that I'm still friends with today. That said, I support the military practicing their war games, and you guys can start at 1600 Pennsylvania Avenue NW, Washington D.C. 20500. And now to make clear, I going to huli kua, because I don't need to speak to you. I'm going to speak to the lehulehu tonight, the lahui. I can remind you guys a little bit of why we're standing here taking a part of this piece of crap process. You already know. But some need helpful reminders. And it's all because some kanaka have taken the cheese. And that's why we call this the Mickey Mouse process, because somebody playing Mickey Mouse games with us. And we could give them Mickey Mouse ears to wear tonight, but we already can identify them. Anyway, that being said, in light of FestPAC -- FestPAC -- such an individual from Samoa had reminded us that in Samoa they remind -- they remind daily their youth that their identity is not negotiable. It's not negotiable for us, either. Keoki [George] Helm (phonetic) had told us and reminded us that no matter how many times you bomb, you desecrate our aina, we're always going to show you the value of aina. Many of us have provided reminders tonight to live with aloha. Sometimes aloha is not friendly, not happy, and not welcoming. So in the words of Uncle Skippy, keep your middle fingers current. Mahalo.</p>	
Tasman Mattox		<p>Military presence in Hawai'i has caused extensive damage to our 'aina and threatens our precious natural resources. The three army facilities are <u>home to endangered and threatened birds like the 'apanepane and 'i'iwi</u>. Please give the land a new lease on life (haha) by allowing the current lease to expire in August 2029. Take the meantime to create a plan to protect the beautiful Hawaiian nature that so many come to see every year. Mahalo nui.</p>	<p>Protected species at Kahuku, Poamoho, and Makua are discussed and analyzed in Section 3.3.5.1, 3.3.5.2, and 3.3.5.3, respectively.</p>
Rose Mau		<p>The military should not be allowed to lease any land in Hawaii.</p>	<p>Please see General Response.</p>
Indie Mauai		<p>No more stolen lands!! Hawaii needs to be demilitarized and given back to the Kanaka Maoli who have been there for centuries before colonization. This is theft. Do not write us off. Kanaka Maoli matter. Allowing these leases would be continuing your commitment of</p>	<p>Please see General Response.</p>

Commenter	Submitted By	Comment	Response
James K. Mauaky Sr.		<p>atrocious crimes against our kingdom. No more military leases. No more military in Hawaii. Land back NOW?</p> <p>Aloha. Hello. My name is James K Mauaky. Aloha, everybody, concerned parents, grandparents, great-grandparents. Yeah. I just made 87 a couple days ago. Oh. 87. 87. No. I'm -- that's too old. 78. Just trying to change the numbers around. I like changing my numbers around, but that's too old. I normally change it around when I was younger, but anyway. . . . I've hunted that area. I've hunted there since in the early '60s with my -- I learned how, what we call, the Hawaiians call it subsistence hunting. So I've hunted there when I walk next to a bomb almost as big as that devil thing there. I don't know how big that was. . . . But if you would look in the records, it was the second bomb who -- above -- above the land in the river. There was two of them in there. A live bomb, I found out later, because when you pull on the little thing then the thing went boom. But we used to go hunting there, you know, when we rest, when we came up let the dogs run around, look for the pig. And so that's how dangerous it was. . . . In fact, when you walk in the -- to the --when you walk in the first river there from the highway, and you walk straight in, we used to walk through the -- the grass there. So when you watch the fires burning, and you see the boom, boom, boom, boom that's where we used to walk to go to the first pocket there. That was a very productive pocket, by the way. And you see all the bombs that goes off. So that's how dangerous it is. So we really need your help. Yeah. . . . And so when the people gave up their land, sir, they gave it up willingly. And the reason they gave it up was because they understood that when we went to war, it was important for our children to learn how to handle what they were going to handle whether it was a gun, whether it was a weapon, or it was a cannon. Whatever kind of weapon we -- we knew. Because as a hunter, I knew that if I went into the mountain, if I never knew how to -- to use what I need to -- what I was using, I would come home without anything. . . . So we also knew that when our children went to war, we wanted them to come back. So it was important for us for when we</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>-- when you asked us, that you needed the valley or wherever you needed, we accepted what you needed.· So now that you're through, we want it back.· So we're asking you, we want it back.· Thank you.</p>	
Stan May		<p>Good evening. I'm Stan May from Sunset Beach, and I'm in favor of the renewal of the leases for the military. I strongly support the military. I think there's a lot we take for granted. We have the freedom to come to a community meeting like this, our freedom of speech -- okay -- to express our opinion. I think we take a lot for granted. Military is putting their lives on the line every day. My parents fought in the second world war. I lost an uncle -- and he has a memorial at Pearl Harbor -- you know, fighting for those freedoms. If you look at your other options -- okay -- China under Xi or Russia under Putin, you wouldn't have the ability, you know, freedom of speech, and how would the Kauai community have done? During World War II -- During World War II, it was a struggle against Nazi Germany and Imperial Japan. If Nazi Germany had won that war, I can tell you, we would not be having a community meeting like this, and I really question how the Hawaiians would be under that kind of a system. When we became a state, there was a referendum, and over 90 percent of the residents of -- the residents of this state were in favor of that. And I think that they -- that would be the same today, to continue to be part of the United States. Thank you.</p>	Please see General Response.
Stanley May		<p>I am strongly in favor of the renewal of military leases on Oahu, and also in favor of the military purchasing said lands. I strongly support the men and woman in the military who put their lives on the line every day to protect our freedoms. Oahu was the site of the attack on Pearl Harbor. What would our lives be like today if Nazi Germany had won what war? I attended a community meeting in Kahuku. Our meeting was hijacked by a flying squad from outside our community that seems to attend all these meetings. No respect was shown to the community as they drowned out our voices. Testimony at the meeting in no way was representative of the opinions of members of our community or of the people of Oahu.</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
Oriana McCallum		My name is Oriana McCallum. I grew up in Kahuku, and I raised my boys here. Today, I stand with all Hawaii people and Kanaka Maoli in solid support of returning this land to the people of Hawaii.	Please see General Response.
Oriana McCallum		This is the land in Article 12 of the Hawaii State Constitution to be held in trust by the State of Hawaii for the benefit of Native Hawaiians and the public. When property is held in trust, it is the state's fiduciary duty to ensure that this property has the highest benefit in favor of directly benefiting the beneficiaries. It seems highly peculiar to me that the EIS doesn't talk about the best use of this land for native Hawaiians and the public and openly admits that the greatest benefit to the people would not -- would be not to renew the lease. The bottom line is that this land must be stated in the EIS, it does not. Leasing this land to the military does not directly benefit the people. I want to ask you five questions. Some of this has been already addressed, but some of it may not have, and I hope that all of it is fully addressed in the final EIS. How can a renewal of the military lease of this land directly benefit the people of Hawaii when -- value -- who value land above all else when the military has repeatedly shown to be destructive of the land? At Pohakuloa, with the mess that has still not been cleaned up; at Makua Valley, where a recent explosion sent a groundworker to the hospital; at Waikane, where the land was condemned rather than cleaned up and returned as promised; Pearl Harbor, Red Hill, Koho'olawe, the list goes on and on. Continuing the lease of public lands to the military supports a condoning of destroying the lands of these islands.	Benefits occurring as a result of returning lands to the State are identified as part of the No Action Alternative analysis in Section 3.12.5; what the State specifically chooses to do with these lands is speculative and not part of this analysis.  Section 4.3 and Appendix K discuss the Proposed Action's consistency with Federal, State, and County Land Use Plans, Policies, and Controls.
Oriana McCallum		How can a renewal of the military lease of this land directly benefit the people of Hawaii when we have to battle military occupants when trying to rent a home here in the islands? the military condones the impact on the housing crisis for local residents who cannot compete with the richest department in the United States paying for these rents. How can a renewal of the military lease of this land directly benefit the people of Hawaii who pay outrageous prices for food that is 90 percent imported when Kahuku Training Area alone encroaches on 13 of the ahupua'a that -- that	Sections 3.11.5.1, 3.11.5.2, and 3.11.5.3 discuss KTA, Poamoho, and MMR socioeconomic resources, respectively. Benefits occurring as a result of returning lands to the State are identified as part of the No Action Alternative analysis in Section 3.12.5; what the State specifically chooses to do with these lands is speculative and not part of this analysis. Text has been added to Section 3.12 Environmental Justice to further assess



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		<p>community plans, such as the Ko'olauloa community plan, seek to restore use of for -- the productive sustainability that once existed. Please allow me to finish. Thank you. I apologize. This is really hard for me, so I appreciate your patience. Thank you. A continued lease of public lands to the military opposes the goals of the island community plans to ensure that sustainability.</p>	<p>significant impacts on Native Hawaiians.</p> <p>Section 4.3 and Appendix K discusses the proposed action's consistency with Federal, State, and County Land Use Plans, Policies, and Controls.</p> <p>Sections 3.12.5.1, 3.12.5.2, and 3.12.5.3 discuss KTA, Poamoho, and Environmental Justice resources, respectively.</p>
Oriana McCallum		<p>How can a renewal of the military lease of this land directly benefit the people of Hawaii when the only two registered sites of Native Hawaiian history in Kahuku are restricted because of their location within Kahuku Training Area, along with many other Native Hawaiian historic sites restricted within these lands? A continued lease of public lands to the military means continued closed doors to the evidence of Native Hawaiian history in Kahuku, as well as all of the places that these exist.</p>	<p>Section 3.4.5.1 addresses historic and cultural sites at KTA; text has been added to Section 3.12 Environmental Justice to further assess significant impacts on Native Hawaiians.</p>
Oriana McCallum		<p>The last question is to be addressed under the alternative of returning these lands to the people. What state inspections are being conducted to ensure that when these lands are returned to the people Hawaii that they will be returned in good repair for their future benefit? The Department of Defense has repeatedly shown that they are unwilling or incapable of repairing the damage they cause and cleaning up the mess they make on the lands you -- they occupy. The lease made public at Pohakuloa, that I assume would be the same for all of the 1964 \$1 leases, requires that you keep these lands in good repair for the future use of the people in Hawaii -- people of Hawaii. So what state inspections are being done to ensure that? So those are my questions. Thank you for your time. Malama aina.</p>	<p>Section 4.3 and Appendix K discuss the proposed action's consistency with Federal, State, and county land use plans, policies, and controls. Section 3.2.5 has been revised to include the status of State inspections of the leased properties.</p>
Sala McCarthy-Stonex		<p>The continued military occupation of native hawaiian lands throughout the island of O'ahu must cease. State-owned lands administered by Army Hawai'i perpetuates an inequitable system whereby indigenous lands are kept out of reach from indigenous hands. Objectively, the terms of the current lease, particularly re</p>	<p>Please see General Response.</p>

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		the lack of compensation to Hawai'i as a state and to indigenous, grass-roots organisations, are unconscionable and should end.	
Susan McCorry		Hello, please respect the wishes of the Hawaiian people regarding these leases! These leases will negatively affect the land, the water, the air and the people near by. Thank you, Susan	Please see General Response.
Kinsley McEachern		<p>Aloha,</p> <p>I stand with many other environmental and social and indigenous justice groups across the Hawaiian Islands. I am a conservation biologist who works to protect endangered species across Hawai'i. I am deeply passionate about the native wildlife and ecosystems who have called Hawai'i home for millennia.</p> <p>I stand with many other members of the global community to demand that all military leases set to expire in 2029 on O'ahu not be renewed and that the US military clean up, restore, and return the lands they occupy to the rightful owners, the Kānaka Maoli people.</p> <p>Since 1964 when the 65-year leases were signed between the "State of Hawai'i" and the US Army for \$1.00 each, military activities have led to "significant adverse impacts" on O'ahu's natural resources, historical and cultural sites, and social fabric. Cultural access to traditional burials and other significant sites on the public lands leased by the US Army remains restricted.</p> <p>We can not continue to ignore the military contribution to the climate crisis and how these military actions undermine the quality of life for most people and wildlife who call Hawai'i home. All three Army training areas are home to dozens of endangered species and are located in close proximity to residential communities - exposing residents to hazardous and unsafe combat like conditions including toxic emissions, noise pollution, and fire risks while perpetuating an ongoing legacy of unexploded ordinance, invasive species, and the contamination of water sources and soil on these once-fertile lands which are sacred to the Kānaka Maoli people.</p> <p>I deeply oppose the renewal of land leases on the island of O'ahu for the U.S. military. This land needs to be protected and return back to the loving stewards of the 'aina, wai, and kai- the precious</p>	Impacts on biological resources, hazardous substances and hazardous waste, air quality, noise, and soils are discussed in Sections 3.3, 3.6, 3.7, 3.8, and 3.9 of the EIS, respectively.

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		<p>native ecosystems in Hawai‘i. Hawaiians malama Hawai‘i and so the U.S. military needs to end their illegal occupation of these lands.  Sincerely,  Kinsley McEachern</p>	
<p>Madelyn McKeague</p>	<p>Council for Native Hawaiian Advancement;  ‘Ekolu Mea Nui;  Institute For Native Pacific Education and Culture;  Kanaeokana;  Kua‘āina Ulu ‘Auamo;  Papa Ola Lōkahi;  Sierra Club Of O‘ahu Group;  Sierra Club Of Hawai‘i</p>	<p><u>RE: Strong Support for No Action for the Army Leases at Kahuku, Poamoho, and Mākua</u>  Aloha mai kākou,  Mai ka pi‘ina a ka lā puka i Ha‘eha‘e a i ka mole ‘olu ‘o Lehua,‘ano‘ai kākou. There is an deep, familial connection between the land and the people who live on it intrisically woven into the histories and genealogies of Native Hawaiians. We see this pilina (relationship) in oral traditions as early as the Kumulipo, one of Hawai‘i’s foremost cosmogonic genealogies,[1 Martha Warren Beckwith (translator) &amp; David Stampe (interlinearizer), Kumulipo A Hawaiian Creation Chant, at 13-15 (1951).] and mo‘olelo (story) of Hāloanakalaukapalili, the first kalo plant and the elder sibling of all Native Hawaiians. [2 Kamehameha Publishing, Hāloa: Let’s Talk Story About...Hāloa!, Kumukahi (July 1, 2024, 11:39 AM), <a href="https://kumukahi.org/units/ka-hikina/haloea">https://kumukahi.org/units/ka-hikina/haloea</a>.] In order to protect and preserve this connection to the land, the undersigned organizations express our strong support for the No Action Alternative for the Army Training Land Retention of State Lands (ATLR). [...]  The research in this comment is specific to the valleys that make up Mākua Military Reservation (Mākua, Ko‘iahi, Kahanahāiki), but our concerns raised in this comment should be considered analogous to all U.S. Army land leases up for expiration in 2029.  <u>Mākua Military Reservation Mo‘olelo and Background</u>  Pumehana ka hale i ka noho ‘ia e ka makua. Warm is the house in which the parent lives. [4 Mary Kawena Pukui, ‘Ōlelo No‘eau: Hawaiian Proverbs &amp; Poetical Sayings, #2748 (1983)] The word mākua directly translates to “parents” in the Hawaiian language.[5 Mary Kawena Pukui &amp; Samuel Elbert, Hawaiian Dictionary] As Native Hawaiians are born of the land, the land itself is the makua. As a parent cares for and raises its child, it is also the child’s duty to</p>	<p>Section 2.5 of the Final EIS has been revised to state the No Action Alternative is identified as the Preferred Alternative for Poamoho and MMR (i.e., where the State-owned land at MMR would not be retained).</p>

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		<p>care for its parent. The Army’s history of abuse in the valleys of Mākua, Ko‘iahi, and Kahanahāiki (hereinafter referred to as “Mākua” in totality) severs that connection between child and parent. Mākua’s name is no coincidence. Mākua was the place where the progenitors of mankind, Papa and Wākea, met to create man.[6 Marion Kelly &amp; Nancy Aleck, Mākua Means Parents (1997).] Mākua is the birthplace of man and therefore the parent to mankind. The time has come to right a wrong and allow the lease at Mākua to expire, returning Mākua to its keiki who will care for it the way it needs to be cared for.</p> <p>Mākua is a place of vast cultural and environmental importance. In the mo‘olelo of Hi‘iakaikapoliopole, Mākua served as a resting place for the goddess Hi‘iaka on her journey to fetch Lohi‘auipo for her sister, Pele. It is also in this mo‘olelo where Mākua is exalted for its maile lauli‘i, which once grew abundantly at Ko‘iahi. [7 Mālama Mākua, Mākua In Mo‘olelo, <a href="https://www.malamamakua.org/hiiaka">https://www.malamamakua.org/hiiaka</a>.] Mākua also was known as a refuge for many critically endangered flora, namely uhiuhi, mamani, and kalamona. [8 Marion Kelly &amp; Sidney Michael Quintal, Cultural History Report of Makua Military Reservation and Vicinity Makua Valley, Oahu, Hawaii (1977) (citing C.S. Judd, Botanical Bonanzas, Thrum’s Hawaiian Annual for the Year, 68-69 (1932)).] Until the 1920’s, Mākua could and did sustain its own community. Pre-Western contact, it was estimated that the valleys of Mākua and Kahamahāiki sustained 312 people. [9 Marion Kelly &amp; Sidney Michael Quintal, Cultural History Report of Makua Military Reservation and Vicinity Makua Valley, Oahu, Hawaii (1977).]</p>	
Madelyn McKeague	Council for Native Hawaiian Advancement; ‘Ekolu Mea Nui; Institute For Native Pacific Education and Culture;	The draft environmental impact statement (EIS) for the United States Army’s leases at Kahuku, Poamoho, and Mākua does not inspire confidence that the U.S. Army has the means or the desire to protect and preserve these places of cultural, historical, and biological significance. Public suggested alternatives that uplift stewardship responsibilities and repair the decades damage were haphazardly eliminated from consideration and not given the benefit of analysis. [3 Draft Environmental Impact Statement for	A stewardship alternative was considered and identified as Alternative 8 in Section 2.4 of the EIS. This alternative was dismissed from detailed analysis in the EIS because it did not meet the purpose and need for the Proposed Action as identified in Chapter 1. As stated in Sections 3.3, 3.4, and 3.5 of the EIS, the Army has programs in place to manage natural and cultural resources.

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	Kanaeokana; Kua‘āina Ulu ‘Auamo; Papa Ola Lōkahi; Sierra Club Of O‘ahu Group; Sierra Club Of Hawai‘i	Army Training Land Retention of State Lands at Kahuku Training Area, Kawaioloa-Poamoho Training Area, and Makua Military Reservation Island of O‘ahu (hereinafter “Draft EIS”) at 2-25.] Thus, none of the remaining potential alternatives adequately address our concerns. While the details for each parcel varies, the patterns of abuse and exploitation repeat themselves for all of the areas included in this draft EIS.	
Madelyn McKeague	Council for Native Hawaiian Advancement; ‘Ekolu Mea Nui; Institute For Native Pacific Education and Culture; Kanaeokana; Kua‘āina Ulu ‘Auamo; Papa Ola Lōkahi; Sierra Club Of O‘ahu Group; Sierra Club Of Hawai‘i	These people were evicted from their lands under the U.S. Army’s claim of ownership to the kuleana lands in that area. While the Army claimed that each resident was paid “fair market value,” conflicting resident testimony reports that they were evicted at gunpoint. [10 Sparky Rodrigues, Waianae and Mākua Valley: Environmental dangers, destruction and restoration (2018), <a href="https://www.youtube.com/watch?v=XqfuMgvZbLU&amp;t=3744s&amp;ab_c hannel=APECEpic">https://www.youtube.com/watch?v=XqfuMgvZbLU&amp;t=3744s&amp;ab_c hannel=APECEpic</a> (last visited Jul 22, 2024).] The U.S. Army’s century-long occupation of Mākua has been one of historic misuse and mismanagement, highlighted by chronic wildfires, toxic chemical pollution, and open area live fire training. Retention of the land is in direct contradiction to concerns laid out by the public and the draft EIS itself: Continued retention or alienation of ceded lands from the public trust intended for the benefit of Native Hawaiians would be a loss to some extent of this sense of connection. Non-Native Hawaiian control of the ‘āina impedes Native Hawaiians’ ability to perpetuate and practice this belief system, including their responsibility to engage, connect, and care for the ‘āina. Therefore, this continued loss of land represents a disproportionate effect and a long-term, significant, adverse impact on communities with environmental justice concerns. [11 Draft EIS, supra note 3, at 3-275] For the betterment of Hawai‘i and its communities, the leases must end in 2029.	The EIS acknowledges significant adverse impacts on communities with environmental justice concerns from land retention, primarily from loss of ‘āina, and is factoring that into decision-making on the Proposed Action to be documented in the ROD. Section 3.12.5 discusses the existing conditions for environmental justice communities and cultural considerations within the ROI. This section acknowledges the sacred and cultural value of some of the State-owned lands, and these factors are also discussed in Section 3.2.5, which characterizes the lands and its importance to Native Hawaiians.
Madelyn McKeague	Council for Native Hawaiian Advancement;	No proposed alternative adequately cares for the cultural resources of Mākua Valley He ali‘i ka ‘āina, he kauwā ke kanaka.	Section 3.5.5.3 discusses the process by which cultural access agreements were agreed upon and safety protocols for cultural access at MMR.

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	‘Ekolu Mea Nui; Institute For Native Pacific Education and Culture; Kanaeokana; Kua‘āina Ulu ‘Auamo; Papa Ola Lōkahi; Sierra Club Of O‘ahu Group; Sierra Club Of Hawai‘i	<p>The land is chief, man its servant. [12 Mary Kawena Pukui, ‘Ōlelo No‘eau: Hawaiian Proverbs &amp; Poetical Sayings, #531 (1983).] The Army’s presence in Mākua dates back to the 1920’s and, in the century since, they have demonstrated a lack of care and sheer negligence in protecting and preserving Mākua’s cultural resources. The draft EIS does not adequately address cultural harms and the No Action Alternative should be taken in the interest of preservation of cultural resources.</p> <p>From the 1940’s until 2004, Mākua was used as target practice by the Army. [13 William Cole, Army ends live fire training at Makua, The Star Advertiser, January 13, 2011, <a href="https://www.staradvertiser.com/2011/01/13/hawaii-news/army-ends-live-fire-training-at-makua/">https://www.staradvertiser.com/2011/01/13/hawaii-news/army-ends-live-fire-training-at-makua/</a>.] As a result of decades of live-fire training, numerous cultural sites and resources such as heiau and ko‘a have been permanently altered or outright destroyed. The nearby graveyard is marred by bullet holes in many of the headstones. [14 Kelly &amp; Aleck, supra note 6.] For arguably the entirety of its tenancy, the U.S. Army has had no reverence or respect for the land. While the valleys were off-limits to the Native Hawaiian community for decades, public access has become more available through the hard work of organizations like Mālama Mākua and Earthjustice. However, there is still a significant amount of improvement needed. As it stands, Mālama Mākua is the only organization who can take members of the public to access the valleys, a heavy burden for one organization to undertake. Additionally, access dates are pre-selected by the Army and eliminates access for many who do not have flexible schedules. More entities and organizations should be cleared to access Mākua and access dates should be controlled by the community who can improve availability and accessibility.</p> <p>It is abundantly clear that Army cares neither for the rich cultural resources at Mākua, nor the generations of families who had lived and died there.</p>	<p>In addition to the measures discussed above in Existing Management Measures, potential mitigation measures for land retained at MMR would include the following actions by the Army: (1) review and update the Army’s public engagement efforts to ensure the current various access programs are known and understood by the community, and (2) work with and NHOs and cultural practitioners to update and/or develop a mutually beneficial cultural access plan that facilitates and increases awareness of safe engagement with cultural resources and practices within the State-owned land at MMR.</p>
Madelyn McKeague	Council for Native Hawaiian	No proposed alternative can adequately repair or protect the environmental and biological resources of Mākua Valley.	Biological resources, including vegetation, native species, and protected species at MMR are

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	<p>Advancement;  ‘Ekolu Mea Nui;  Institute For  Native Pacific  Education and  Culture;  Kanaeokana;  Kua‘āina Ulu  ‘Auamo;  Papa Ola  Lōkahi;  Sierra Club Of  O‘ahu Group;  Sierra Club Of  Hawai‘i</p>	<p>The occupation of Mākua has been defined by adverse impacts to the land, its plants, its animals, and its people. We know that this will take an enormous amount of resources over decades to restore Mākua to its previous state of abundance. The draft EIS does not adequately address environmental harms and the No Action Alternative should be taken in the interest of biological and environmental safety. Pre-Western contact, Mākua was known for being one of the finest sources pili grass on the island. [15 Marion Kelly &amp; Sidney Michael Quintal, Cultural History Report of Makua Military Reservation and Vicinity Makua Valley, Oahu, Hawaii (1977) (citing George Bowser, The Hawaiian Kingdom Commercial Directory and Tourists’ Guide, 490 (1880))] This native grass, particularly used for thatching, also did not produce the same heatintense fires that originate from the invasive molasses and guinea grasses found in the valley today. [16 Kelly &amp; Aleck, supra note 6 at 16.] From 1970-1998, 325 individual fires had broken out at Mākua, with the 50% of the burned areas being affected by fires greater than 100 acres in size. [17 Andrew M. Beavers et al., Analysis of Fire Management Concerns at Makua Military Reservation] Despite live fire ceasing in 2004, massive fires have consistently broken out at Mākua and have caused irreperable harm to the environment. [18 U.S. Army responds to 40-acre fire at Makua Military Reservation, KITV (2022), <a href="https://www.kitv.com/news/local/u-s-army-responds-to-40-acre-fire-at-makua-militaryreservation/article_e2f5e38c-202f-11ed-92ab-2399bf23b62e.html">https://www.kitv.com/news/local/u-s-army-responds-to-40-acre-fire-at-makua-militaryreservation/article_e2f5e38c-202f-11ed-92ab-2399bf23b62e.html</a> (last visited Jul 17, 2024); Makua Military Reservation fire burns 486 acres, Army (2010), <a href="https://www.army.mil/article/43454/makua_military_reservation_fire_burns_486_acres">https://www.army.mil/article/43454/makua_military_reservation_fire_burns_486_acres</a> (last visited Jul 9, 2024).] The Army’s negligence in stewarding the land and implementing fire control specifications advised to them has resulted in thousands of acres being scorched. [19 Beavers et al., supra note 17.] In those fires, countless native flora and fauna have been lost. The Army’s negligence in removing unexploded ordinance and cleaning up after the ceasing of live fire has manifested not only harm to the land but</p>	<p>discussed and analyzed in Section 3.3.5.3. Per NEPA and HEPA requirements, the best available data for biological species was incorporated into this EIS.</p> <p>Wildland fires are discussed, and impacts analyzed, in Sections 3.3.5 and 3.14.5. The Army has added an appendix to their Integrated Wildland Fire Management Plan that includes proactive measures to monitor, avoid, and respond to wildland fire outbreaks to reduce the detrimental effects of wildland fire.</p>

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		<p>also harm to those who work it. In April 2015, two civilian workers were injured after encountering unexploded ordinance while doing grounds work. [20 Beavers et al., supra note 17. 20 2 civilian workers injured after explosion in Makua Valley, KHON2 (2015), <a href="https://www.khon2.com/news/2-civilian-workers-injured-after-explosion-in-makua-valley/">https://www.khon2.com/news/2-civilian-workers-injured-after-explosion-in-makua-valley/</a>] The Army has once again shown its disinterest in caring for the land as and for the community it supposedly serves.</p>	
<p>Madelyn McKeague</p>	<p>Council for Native Hawaiian Advancement;                      ‘Ekolu Mea Nui;                      Institute For Native Pacific Education and Culture;                      Kanaeokana;                      Kua’āina Ulu ‘Auamo;                      Papa Ola Lōkahi;                      Sierra Club Of O’ahu Group;                      Sierra Club Of Hawai’i</p>	<p><u>Conclusion</u>                      This is not the first nor the last time we must negotiate for the proper stewardship of our land. The U.S. military’s failure of restoration and cleanup at Kaho’olawe and Kalaeloa has created a dubious record for itself. This ongoing record leads us to believe that they are incapable of, or disinterested, in stewarding such an important piece of cultural, historical, and biological significance. The U.S. Army should move forward with the No Action Alternative for its land leases at Kahuku, Poamoho, and Mākua. We sincerely appreciate your time and consideration regarding the concerns listed above. For any follow-up questions or concerns, please contact Council for Native Hawaiian Advancement’s Policy Director, Madelyn McKeague at [REDACTED]. Mahalo nui loa. Signed, Council For Native Hawaiian Advancement ‘Ekolu Mea Nui Institute For Native Pacific Education and Culture Kanaeokana Kua’āina Ulu ‘Auamo Papa Ola Lōkahi Sierra Club Of O’ahu Group Sierra Club Of Hawai’i</p>	<p>Please see General Response.</p>
<p>Lawrence Meacham</p>		<p>I was very disturbed by the negative comments made by a small group of activists who went from hearing to hearing and attacked anyone who spoke in favor of the military. They do not reflect the feelings of the larger community where I have lived for 20 years. Everyone should realize that our people are too busy making a living and taking care of their families to go to hearings. First of all, the military defends us. They need to train to be effective, and they need someplace to train. China is getting closer and closer. Distance is shrinking. Our isolated location longer keeps us safe. That's why the military needs to use the land.</p>	<p>Please see General Response.</p>



Commenter	Submitted By	Comment	Response
		<p>Second of all, the military is the second largest part of Hawaii's economy. Our town of Wahiawa would shrivel without the military. Leilehua High School proudly calls itself the Mules, named after the mules that used to populate Schofield Barracks, and many military dependents happily attend Leilehua. They and their parents are part of the community.</p> <p>Third, we are residents of Hawaii, but we are also American citizens. We cannot just cruise along enjoying freedom and prosperity. We also have a responsibility to support our country, including the military.</p> <p>The military should use the land responsibly, but we must also face up to our duty to support our country.</p>	
Alfred Medeiros		<p>aloha mai kākou, 'o Alfred Keoki Medeiros ko inoa no waianae mai au mahalo mahu nui, William Ila, amazing to see you here. I've seen you inside when I was against you on one side. . . . I look at this room, I see plenty people aged in this room doing the same meetings, yeah? Every year we sit inside this dog and pony show thinking you guys take any notes, but when you guys walk out the door it goes right into opala. We know this. . . . Kapukaki Red Hill is an example of what happened just recently. We talk about Makua in the past. Let's talk about now. I live in Ma'ili. Bombing every day and night, disgusting. Your guys' choppers flying over making so much noise 11:00 o'clock at night where our keiki trying to rest, where our kupuna trying to rest. You guys have no care. Can you answer me, what have -- what good have you guys done to Hawaii? I can wait. 131 years we've been waiting and nothing has come good from you people. Not only here in Hawaii, nah, across the globe. You guys are a problem more than a solution. You guys cause pain to people like myself because it's been going on through our ancestors for years. . . . You look in this room, my dad's best friend, Uncle Rocky right here, has been aging through this fight. He's a veteran just like my dad. So it's not against you as a soldier, sir. It's what you represent on that right arm, that I burn on July 4th every year. That's my fireworks. Yeah. Because I don't ever take pride in that red, white, and blue doo-doo of a toilet paper flag that</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>you raise up high. I burn it in significance of what you guys done to us. . . . . We shouldn't have to come here and only speak two minutes because it's not enough time. She's writing a ku'e- petition on her. That speaks loud and clear of what you guys have done and the way you guys don't listen to the people. Enough is enough. This fight don't stop here. 2029 we change the locks on those gates, we put our own. We fight the battle against you. You guys get guns, fine, let's fight. We can do our own. I do MMA shows in Hawaii, like, hop in the ring, sir. I'm down for you. You're my weight, you know? . . . . . I'm tired of this talking. That's why we need action. We need to do what other countries are doing too, and if you guys want that, we here and we ready. But the best thing you guys can do is pack up and go and don't take nothing with you because it's not yours; it's ours. You steal from us, we steal it right back. . . . . I'm tired of being nice in these little fucking meetings and looking like a fucking joke. That's why, sir, no -- no disrespect with these words, but we fucking tired. Yeah. We stay outside 10 days on Anahulu on the corner in front of you guys' place, you guys drive back and forth like nothing. Poisoning all of our water, poisoning of your own, killing of your own people, and nothing. . . . . Same thing as in Camp Lejeune, same thing you guys are doing in Palestine, everywhere, and nothing. Look at me, yeah? You feel it? I feel it every day when I wake up and I see the same shit you guys do to everywhere else, especially in our home of Hawaii. Why we got to get water purification systems? Because of you. Why we got to be on a house on -- on a beach? Because of you. Yeah. And this American Government that helps them, that guides them, and these politicians that come in and make like they're for the people, but they not. They drunk. . . . . That's the joke about this fucking system is that you guys control them like puppets while we're over here thinking, yeah, we're going to have change, we're going to go -- going to go 20,000 walking from ala moana to Kapi'olani. We're going to stop this hewa and then what? Our own join you side by side. Yeah. Signing paper. Making sure that their money in their bank account establish while we</p>	

Commenter	Submitted By	Comment	Response
		<p>continue to be displaced in our own home. . . . How would you like it if I go to punch bowl, take an excavator and start digging? Because that's what you guys do to us. It should be bite back, fight back, eye for an eye in my way. That's what we should do. 2029, trust that. . . . This lease continues, I will go back where I should be. I will yank out graves. I will do what I got to do for my ancestors as a descendant of hope. As a descendant of poa. Enough is enough. No new leases. Go home. That's where you belong. You don't belong here, none of you. Okay.</p>	
Koa Melcher		<p>Greetings,                      I am on a mission to restore all land affected by military occupation. My organizations Koa Keiki Farms and Le Kakou-UXO Recovery Company. My mission is to clean the [Kahoilane] and [place] off grid farm systems, shelters, [clinics] and classrooms. Create a new [county] and more [stals] in the state rep + senate. Let's [collaborate] for the benefit of all people who live in Hawaii. KOA MELCHER KOA KEIK FARMS LLC LEU KĀKOU KOAKEIKIALII GALLERY</p>	Please see General Response.
Kapuaonaona Mersberg		<p>As a Kanaka Maoli and steward of Hawai'i and 'āina I strongly oppose the U.S. army lease extensions in Kahuku Training Area (KTA), Kawaihoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O'ahu. This is my testimony regarding the US Army Draft Environmental Impact statement. The U.S. army has too long privatized and abused our sacred land. They damage our environment and threaten our precious natural resources such as the watersheds at Red Hill. The draft EIS fails to acknowledge the depth of generational harms that have resulted from the US military-aided illegal overthrow of the Hawaiian Kingdom, harms that would be exacerbated by the continued occupation and abuse of these stolen Hawaiian lands by the U.s. Department of defense and its "allies". These sites are home to dozens endangered native species and Hawaiian cultural sites.</p>	Please see General Response.
Judith Mick		<p>I came to Hawaii through the in Navy 1968. I chose to settle here and became active with the Hawaiian community. The US military took over hundreds of acres of land in Hawaii, much of that space is</p>	Please see General Response.

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		not longer needed and should be returned to the indigenous people now. You would feel the same if your country had been taken over by another. Let us do the honorable thing and return much of this land to its rightful owners,. Mahalo.	
Jobi Miguel		I oppose this continuation for leasing this area for military training for it continues to desecrate our aina and could be providing more space for our aina to be self sustainable	Please see General Response.
kayla miles		Honor native wishes. Leave the island.	Please see General Response.
Danielle Miller		I oppose, this land is sacred and should be protected and preserved for the natives on this land.	Please see General Response.
Michael Miller		To whom it may concern, it is way past due for the military to relinquish their lease on Oahu. The rights of Native Hawaiians and the general public must be the main priority. Please be on the right side of history. Thank you.	Please see General Response.
Peter Miller		I write in favor of the EIS and military use of Hawaiian lands. I have lived near Pearl Harbor for decades and regularly see and hear military aircraft and vehicles; I travel throughout the islands regularly. Their impact on my quality of life and my productivity is very small, yet their impact on my freedom and the military readiness of our country is very large. The NIMBYs and community activists have only their selfish interests in their protests. The military presence in Hawaii has included mistakes in the past - esp Red Hill - but I appreciate improved community engagement in recent times. Military training and presence can and should co-exist with native Hawaiian and community cultural presences - there has always been conflict between people, here and in the world and we must include our own backyard in the resources to minimize conflicts.	Please see General Response.
Scotty Miller		To whom it may Enuff Already. Give Back the Aina to the people Scotty Miller [signature]	Please see General Response.
Jacob Mirels	Kahuku Motocross Park	I am here because I love The Dirtbike track @ Kahuku and have been riding there since I was a kid. Now I am 35 years old and am raising my son as a dirtbike rider and get to share my sport with him. I do not want to lose that and many people here have the	Section 2.3.2.1 stipulates provisions for motocross use in a future land estate and states that all public access to the State-owned lands retained would be negotiated with the State or other

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		<p>same story and feeling. The trails up there have been built over the course of 60-70 years and people have put tons of sweat, blood &amp; love into those trails. It would be a shame to lose it. <u>Also, if the track was closed people would end up trespassing to access these trails</u> and eventually there would be a serious public outcry. Please do not take that Park away from us.</p>	<p>appropriate stakeholders, for example, to participate in motocross events when the training schedule allows.</p>
Kelsie Misech		<p>END ALL MILITARY LEASES.</p>	<p>Please see General Response.</p>
Jody Mitchell		<p>I Jody L Mitchell am a resident born and raised in Hawai'i. I am opposed to any continued military training in the state. It is bad for the land , our water resources and our people. No more</p>	<p>Please see General Response.</p>
Rita Miyamoto		<p>No lease should continue with any US military entity. Significant adverse damages have already been done across all military installations across the islands affecting all living organisms, many endangered and found nowhere else in the world. No land has been returned usable or in good health. The US military continues to prove itself to not be good land stewards and should not be allowed to continue its desecration of the land and its people. Enough is enough. No more disingenuous and inadequate EIS. It's time to clean up and return the land to its people.</p>	<p>Please see General Response.</p>
Cody Miyashiro-Carvalho		<p>The land was taken illegally. The sovereign kingdom was and continues to be illegally occupied. These are facts supported by international laws and treaties as well as U.S. resolutions. Hawaiian sovereignty &amp; self determination obliterated. Wrong from the start. And then while here, continuing to illegally occupy, the military has had a long history of documented poisoning of people, lands, and waters of this place. The wrong continues. And now you proposed continuing to illegally occupy and negatively impacting this 'āina and its people and continue to not offer any fair compensation for the land use or reparations for damage already done or that will surely continue. The wrong endures and forever scars this 'āina and our people. This occupation was never supported, is not supported, and will never be support by the people.</p>	<p>Please see General Response.</p>
Kaitie Miyashiro-Carvalho		<p>Aloha.· Mahalo everyone for being here.· Mahalo everyone for being here.· Aloha.· My -- I'm Katie.· What is your name? Hi, Steve.· I'm Katie.· I'm a makuahine.· I'm a former teacher at Waianae High</p>	<p>Please see General Response.</p>

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		<p>School, and I'm a Kanaka Maoli, and I'm here on behalf of my son, Treaton who's speaking after, and my daughter, Makali'i. Can you please say her name? Makali'i? Say it one more time? Yep. Makali'i. She's almost turning 1 on July 31st, which is La Ho'ihohi Ea. Are you familiar with that day, sir? Can you share what you know about that day? Okay? Thank you. Well, it is a day of Sovereignty Restoration here in Hawaii. And, I think, we've heard a lot about your draft and, I think, it's easy to create your report in isolation of the military's perspective and what your desire is. And, ultimately, the benefits of your \$1 lease over the last 65 years. . . . . But I want you to look at my daughter and remember her name. Especially if you write it down. It's Makali'i, M-a-k-a-li' - i. Are you familiar with the -- our story of the Makali'i? Yeah. So Makali'i is a constellation. It's also known as Pleiades. And when Makali'i rises, it is the start of Makali'i season and, typically, that's in November through around March. It's known as the rainy season. It's when we have rest, restoration, fertility, harvest. It is also a time of peace, which means that there is no war. . . . . So when your \$1 lease ends in 2029, Makali'i will be five years old. And I want Makali'i's lifetime to be a time of peace in her own aina. And I want you to understand what a renewed lease means for Makali'i and for my son, Treaton, and all the keiki we are here representing. . . . . It means a loss of aina. It means a loss of our connection to our aina. It means a loss of connection to our waters, to our plants, to our birds, to our culture, to our fish, waianae, the fish that we don't see anymore. It's continued loss for us and it's continued mistrust between us as kanaka and you as haole, Western American. . . . . I've heard a lot of people say that you are just a colonel. You are not just. You are here, and you have kuleana and you have responsibility to make right what your ancestors have done to us and to our land. Pledge of Allegiance says justice for all. Is that true or is that justice for you? . . . . Remember my daughter, remember Makali'i. Remember my son. Remember what you will be taking from my kids, stealing from my kids. You weren't here 70 years ago when the Army got all of this for \$1. More aina that we</p>	

Commenter	Submitted By	Comment	Response
		<p>as kanaka have access to on Hawaiian homestead.· But what is on you, Steve, is the opportunity you have to make pono, restore what's right and give us back our aina.· Not so that we can own, but so that we can restore, as what we can protect as kahu and as stewards of this aina. Mahalo.</p>	
<p>Traeton Miyashiro-Carvalho</p>		<p>Hello.· My name is Treaton, I'm the daughter of Katie and the brother of my sister, Makali'i.· I am 14 years old, and I go to Kamehameha Kapalama.· I'm here because I used to go to public school and then I got into Kamehameha and I was educated on the way that my country was taken over and illegally, basically, put into a position where their culture should be forgotten.· . . . . And the holiday that we all most recently, or you celebrated is July 4th.· The American Revolution is your independence, which just, like, it's celebrating your independence with your fight against the British.· But what about our fight against you?· We -- we lost our independence.· We became the 50th state of America when there should only be 49 or really 13.· . . . . So my only ask is that we're given a say into what happens with our land.· If you want it, in the rare case scenario you get it, we better get a ton load in return for everything that you took before and what you would take in the future, unless we take it back.· . . . . I just want to create a safe place for me to grow up and, hopefully, in the future my keiki to grow up where it's a safe community where we all can speak freely and have all the land that belongs to us.· Sadly, that doesn't involve you.· . . . . I appreciate you being here and taking all of this, you know, say, like, words and negative energy that's coming towards you because I know it sucks.· I'm in middle school.· It's just -- so I really appreciate you being here.· It takes a lot of guts.· Mahalo.· I hope you take my testimony into account.· Thank you.</p>	<p>Please see General Response.</p>
<p>Solomon Mokiao</p>		<p>i oppose!</p>	<p>Please see General Response.</p>
<p>Mariana Monasi</p>		<p>I share a vehement NO to extending military leases on O'ahu. Military occupation has repeatedly shown us the lack of care for Kanaka and local residents, which the US military flaunts without consequence.          The US military, the best funded organization in the world- has</p>	<p>Please see General Response.</p>

Commenter	Submitted By	Comment	Response
		<p>absolutely and utterly destroyed land without paying the Hawaiian people ANYTHING other than a \$1 over 65 years. Part of the incredibly disgusting misuse - not sticking to any of the land stewardship agreements that were included in past leases. In addition to not paying and not holding up any accountability of stewardship, military occupation quite literally poisons our waters, depletes natural resources, it puts a giant military offensive target on Hawai'i as the begrudging host to the US in the Pacific, it displaces Hawaiian families that can't compete with high monthly allowances given to military personnel, and it increases the violence against women and children, not limited to literal human trafficking of young indigenous women.</p> <p>The military has done nothing to provide safety, it is a series of smoke and mirrors that only harm the population of Hawai'i.</p>	
Tony Moniz		<p>My name's Tony Moniz. I am Hawaiian as it can be. I think Uncle has the documents. Enough said. The military, to me, came here to steal, kill, and destroy. I have four generations of playing in the mountains, from Kahuku, East Range, Mililani, all over the island. I'm very involved here, from Mauka to Makai. And you guys have done nothing for us, which you've heard many a times. So that person who is looking at me in the camera, is that your boss looking at me in the camera? Who's -- who's looking at me in the camera? Anybody from the state representative that are here that can help us out? Is there anyone from the state or the city? I feel like we don't have any support. And there's so much in my heart that I could say, but a lot of it has already been spoken to you guys. And we just need our land back. Uncle's got the documents. It just hurts my heart. Generations and generations to come and to enjoy our land. You guys, it's all your fault. All your fault that you showed up, and there went Pearl Harbor. My dad was a little boy, born and raised, Papakolea. He was up on the roof, watching Pearl Harbor get bombed. It's really sad that you military, US military, what you guys are doing worldwide, let alone come to our little 'aina and just destroy it. The pollution you live -- that you guys leave out in the mountains is beyond description. You do not even know. I've been</p>	Please see General Response.



Commenter	Submitted By	Comment	Response
		<p>in these mountains longer than you. I've been in this ocean longer than you. And I know you know that. And you guys have no respect for it. Zero respect. Because we know. We know all the evasive problems that happens up there. And your studies, there's no evidence, because all the pollution is out there, from the landscape to our dirt. You guys are ruining it. And if we don't stop you, our generations to come are not going to enjoy it. They're not going to have it. Thank you.</p>	
Robert Monteiro		<p>The United States Army , At bare minimum there has to be a renegotiation of price point for the lease of the land. It is unreasonable to ask that the land is leased at such a value. No landowner would willingly lease land for such a price at the valuation that it is at. And furthermore, no landowner would release land to a tenant that has been a poor tenant to such land, by way of not taking care of or polluting said land.</p>	<p>Section 3.2.5 has been revised to clarify the assumption that fair market value would be paid by the Army for any future land retention method.</p>
Ellison Montgomery		<p>Leases of lands at Kahuku Training Area (KTA), Kawaihoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O'ahu, should be not be renewed, swapped or continued in any way, shape or form. These areas contain habitat for critical endangered species, important native Hawaiian cultural and spiritual sites and much more. They are not for bombing, shelling or artillery practice and continuing to do so will negatively impact our fragile ecosystem. They must be handed over as conservation areas with a protected status and the military must do it's due dilligance to clean up the contamination and pollution. It's only pono.</p>	<p>Please see General Response.</p>
sandra Morey		<p>The constant use of ordinance on the land and water causes contamination of land, water &amp; air for the civilian population as well as wildlife, military individual families and tourists visiting the Islands. Already Red Hill has contaminated the drinking water for families who live in military housing &amp; has effected the ground water for much if not all of Oahu.</p>	<p>Please see General Response.</p>
Emili Mu'ala		<p>My name is Emili Mu'ala, and I Kahuku Elementary School. A'ole to our military leases because we need to malama our aina. Mahalo.</p>	<p>Please see General Response.</p>
Hoku Mu'ala		<p>Hi, my name is Hoku. And I'm five, and I -- a'ole. Aloha.</p>	<p>Please see General Response.</p>

Commenter	Submitted By	Comment	Response
Konala Mu’ala		Aloha. My name is Konala Mu'ala, and I am eight years old. I live in Kahuku, and I am -- and I go to Kahuku Elementary, and I will be in third grade. I oppose the renewal of the military lease because I love the aina, and we need to take care of the -- of the aina that will take care of us. Mahalo.	Please see General Response.
Dave Mulinix		Aloha mai kakou. My name's Dave Mullenix, 74 years old. I've been around a little while, and never in my entire life has the U.S. military ever protected me or the United States of America. The last time the United States of America was attacked was 1941, and we've never been attacked since because there's a little thing called mutually assured destruction. This big fear about China that you're trying to put out here to all of us, that, oh, my God, we've got to have the military out here because of China, China has never attacked the United States. We have 800 military bases around the world, 800. Our biggest so-called enemy is Russia. They have 20, and they're all surrounding Russia. Ours are surrounding Russia and the entire world. China, this big fear of China, they have one military base outside of China. This is the big fear we need a military for. The military -- we don't need the military to protect us. You have never protected us from invasion since 1941. It's a waste of billions and billions of dollars. Now, back in 19-- no, 2015 -- I think a few people have been here in 2015 -- the U.S. Army was going to, like, move out of here a little bit. I think 20 or 40,000 folks were going to leave, because the base here was kind of irrelevant for the army, because it doesn't make any sense to have the army in Hawaii. The army is for big military battles, like across Europe or maybe China. But China, we're never going to fight a war with China, because China will have nuclear weapons. So this whole lie that you're here for national security, we already know, you've proven to us, national security has nothing to do with the people. It's all about protecting your assets or your asses. The assets is all you're concerned about. We can all drink jet fuel, you could care less. We could all die from PFAS poisoning, it won't phase you a bit, as long as you protect your assets. And that is really a crime. So we don't need you. You're not helping us. It's a huge	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>economic burden to us for you to be here. You say you're going to bring money to us, we don't have enough places to live, because your people are given huge amounts of money, which brings up our rents. We don't have enough housing because of you folks. And so we ask you, no more leases. Thank you very much.</p>	
<p>Summer Kaimalia Mullins-Ibrahim</p>		<p>As a lineal descendant of the Pulu- Helenihi line of Makua. I would like to see the U.S. military clean-up and restore the training lands on O'ahu &amp; the surrounding streams &amp; ocean from the years of dumping, bombing and other forms of destruction before turning these lands over to the people of Hawai'i.</p> <p>I would like our iwi kupuna to finally rest in peace and for our future generations to be able to visit these ancestral lands without the restrictions ohana faced for 4 generations. These are not your lands for the taking. These were not your lands to destroy.</p> <p>Over the years, I have provided both tears and comments to a brick wall. I have been given my 10 minutes (through several EIS hearings) to speak about my feelings on thousands of pages of information the US military has provided over the years about the impacts this training has on our ancestral lands. My words have been cut off mid-sentence along with many others &amp; now after all of it, I have been left completely disenchanted by this process. This process opens wounds that have never healed &amp; the only reason I give testimony today is so that my mo'opuna know what side of history I stand on. No more training on our aina! Clean up &amp; get out!</p>	<p>Please see General Response.</p>
<p>Shelley Muneoka</p>		<p>Aloha. My name is Shelley Muneoka. Welina mai kākou, mahalo. Mahalo for the opportunity for us to energize each other, as these hearings only make us stronger. After many hours of testimony this week, I hope you can feel the impact that 60 years of Army occupation of our 'aina has had. This DEIS, in all of its 1,000-plus pages, does a piss-poor job at capturing our rage, our heartbreak, our longing, our ferocity, our commitment to love, our refusal to forget these places. Since your EIS assumes that it will receive similar or the same lease terms moving forward, you must assume and document the continuation and exacerbation of these impacts.</p>	<p>Please see General Response.</p>

Commenter	Submitted By	Comment	Response
		<p>If this is how we feel after 60 years of restricted access, I shudder to imagine the grief after 130. Specific language I wanted to address, in my paltry two minutes, is from Volume 3.2, Appendix G, that says that the Army will clean up so long as it's not too complicated or too expensive.· What kind of standard is that?· That is unacceptable. And if it's beyond your capacity to clean it up, don't do it.· That should be non-negotiable. I support the no-action alternative that allow the leases to expire.· All other alternatives preserve the status quo, to which Hawaiian land continues to be bombed, burned, littered, and polluted.· This status quo is precisely what needs to be upended. As things stand, we are not able to provide for the basic necessities for the people of Hawaii.· Food, water, shelter are all in short supply.· With the climate crisis intensifying, the urgent need to refocus on building resilience locally.· Training soldiers for war in distant lands does nothing to address any of these problems, nor the harm that training contributes to each. With a long and painful history of broken promises, like the ones made to evicted Makua residents, that they'd be allowed to return home after World War II, the return of these lands is a concrete thing the Army can do to begin to make things right. If you allow these leases to lapse, you'll still control over 11,000 acres at these three training sites.· While it may be an inconvenience to your training, the community has been more than inconvenienced by your occupation for three generations already.· And it is time to shift that burden back. Instead of pursuing this path to retaining these leases, engage the community in a clean-up plan that will lead to the return of these lands to those who love them.· The return of these 'aina are long overdue, and the time is now to give the land back.</p>	
Marissa Murray		<p>The native people of Hawaii have suffered long enough. The military has no right to continue to steal land from the people they're supposed to be protecting. Hawaiians deserve their land. It is sacred and the military has illegally invaded and destroyed centuries of history and culture. Enough is enough.</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
Nakia Nae'ole		Please express some empathy, and vacate the lands you have been destroying on the behalf of the war business. Let us live on the land and show your people how to care for our Aina.	Please see General Response.
Kimmer Nahonu		<p>Aloha, mai kakou, Colonel McGunegle, and honored dignitaries, police. . . . . All right. I am simply maka'ainana. I am hanai. I -- I came stationed here in 2008 with the United States Army, Schofield Barracks, as a diesel mechanic. . . . . I'm just going to read this. . . . . I'm Turtle Clan, the Water Clan, na honu. The sea turtles are my relatives. I'm of the Iroquois Confederacy from the First Consensus Democracy of Turtle Island from the Finger Lakes area of New York. . . . . The Kanaka Maoli took me under their wing. They're kumu as their haumana and they are my kumu, and educated me with the GI Bill and the Vocational Rehabilitation Program here in Hawaii. . . . . With much patience, much ha'aha'a, humility so that I could obtain a bachelor's degree in art history and Hawaiian studies. And I also went on to Hawaii Pacific for a master's, mahalo mahalo, to study social work. . . . . But I believe it's my kuleana now, I'm simply a maka'ainana, Hawaiian subject of this Hawaiian Kingdom, this country here. This country. It's a country that the -- the European Union doesn't recognize. They ignore. NATO doesn't recognize. Our allies don't recognize. And that needs to happen. That needs to go to Biden, President Trump, our Commander in Chiefs, like he said, our generals, and they need to -- they need to recognize that. Now. It starts now. Change starts now. . . . . No more the hewa aha from President Clinton. I'm sorry we took over your kingdom. No more the fake apology. It starts now with you, sir, Colonel. . . . . The soldiers, airmen, Coast Guard, Navy, Air Force continue to be stationed here for a three-year tour make opala. I seen it first. I'm an eyewitness. I seen that. And then permanent changes station somewhere else. Make big mess and leave. Put their bombs and their ammunition, their casings, and they leave them in the training areas. They do not clean it up. . . . . This would never happen in Germany. This would never happen in Germany. Germans have their military and they will come in and they will scold us and they will deport us because they have nuclear capabilities. The</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>European units has -- the Hawaiians don't have nuclear capabilities. They have aloha. They have kia'i. They fight with their heart. . . . . This is a different way of fighting. They fight with their 'ike. They fight with their mana. They fight with their -- with their lua, Hawaiian martial arts. They have a different way of fighting. It's called kapu aloha. But this is seen as weakness. This is seen as weakness. It is not a weakness, and I am so tired of it. . . . . This has caused their youth, they're homeless. They don't have one home. Their youth suffer from youth suicide. They lead in suicide on their own country because of this. hewa. We cannot ignore anymore. My two Native American children kill themselves because of this war. No more. It stops now. . . . . Let the generals know these people are not afraid to die for their land. I am not afraid anymore. I've already fought. I'm tired of it. This is on Hawaiian time. . . . . Ahupua'a o Waianae. The homeless are living on beaches priced out by the military discount because the military is over here taking up all their land, and all their funding, and all their economy, all their jobs, all their housing. And your -- your ali'i are living in dump. No electricity, no water. No. No, none of -- no food, no nothing. This stops today, right now. Unemployed, mental health issues. The youth have depression from all the loss, from the sonar from the Navy in Kauai polluting our honu, our sharks, our lemu, our seaweed, our coral, everything. The terro, the water, the wealth is gone. The water is being destroyed. The Hawaiian wealth, pau. This ends today. Are you Hawaiian? [Moderator: Yes] Good. Then we on Hawaiian time, aren't we? Deliberately neglect and ignore the war crimes committed to this day. By 2029, I suggest you -- you take one vote. Just like the kue petitions, all the Hawaiians still here fighting. They're all here still fighting. There's tons of Hawaiians on the Turtle Island. Ask them if they -- take a vote if they want -- if they want us here. What should we do? . . . . . We have a -- we have a democracy. We have a constitution. We have -- we have a -- we have an agreement from my people that you stole, the white man stole from us. They have rights under your own constitution. It stops today. It stops today. . . . . Take a</p>	

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		<p>vote of all the kia'i on Turtle Island, see what they say. If they say -- if they check your -- if they check Makua and they check and they find bombs and their keiki going there on all this pollution and they find pollution, then it's pau hana. It's over. You got to go. We got to go. We got to figure this out. . . . This cannot keep happening, this genocide and ethnocide of their culture, their religion. It is a religion. It's just like Christianity and --and Islam. It should be respected as that. . . . The nuclear weapons are attacking our world aggression and pollutes. They are attracting -- our nuclear weapons are -- are just attracting more Putins and -- and North Koreans, and more hate. We got to figure this out. Okay?. Mahalo.</p>	
Leonani Nāho'oikaika-Medeiros		<p>Makua should be returned. I stand in opposition of military occupancy in Makua. Makua means parent. The bombing of Makua is like harming a parent. When you harm a parent, you hurt the family, you harm the children. WE of today are the children of Mākua. For many years, too many years, our parent has been hurt. We have been separated from our Makua. The separation is real. Let us return.</p>	Please see General Response.
Sherel 'Alohilani Nāho'oikaika-Medeiros		<p>End Military leases in Hawai'i! Mākua is a sacred place. In Hawaiian, Mākua means parent. Mākua is our parent. For long enough she has sacrificed herself for your private interests. You took advantage of her aloha and caused irreversible damage. Enough is enough. There is no treaty of annexation and no legal joint resolution. The U.S. military is here illegally. It's time to leave. No more broken promises. We will clean up your mess for we are the maka'āinana and it is our kuleana to mālama our Mākua, our Papahānaumoku, and we are ready now! 'aloha 'oe! Good BYE, never to return again. Ua!</p>	Please see General Response.
Christine Nakagawa		<p>Hello, My name is Christine Nakagawa. I am writing to express my concern over the extension of army leases in Makua, Kahuku, and Poamoho. I am a Native Hawaiian who does not consent to these leases. I oppose renewal of the leases. I would like the record to reflect that my community has spoken and says NO to the continued devastation that military weapons testing has caused on</p>	Please see General Response.

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		the island of Oahu and our sister islands. Sincerely, Me ke aloha, Christine Nakagawa	
Tori Nakamatsu-Figaroa		Given that military use of these lands tends to negatively impact the ‘āina, I'm strongly against any lease renewals of public lands to the military. They have not proven to be responsible stewards of the land.	Please see General Response.
Jordan Kapon Nakamura		Aloha mai kakou. My name is Jordan Kapon Nakamura, and my family has lived here in the illegally occupied Kingdom of Hawaii for four generations, beginning shortly after King Kalakaua saw Japanese labor towards the end of the 1880s. And my responsibility as a guest on this sacred 'aina is to fight alongside my extended indigenous ohana and the rest of the lahui for Hawaiian sovereignty, the health and sovereignty of the land, and to listen to the needs of the people and the land, which sustains all of us. As Kumu Haunani-Kay Trask says, the US military has become the number one colonizing, polluting entity on this planet.· You are manipulating and depriving the people of these lands.· You have an appetite that cannot be satisfied.· You have a hunger for domination without end.· And it has been made clear that even the whole of the earth cannot satisfy the mindless, unchecked desires of a desperate empire that has only learned to take without asking.· You have demonstrated a disdain for accountability. When the Department of Health was requiring urgent testing and remediation for flagrant issues at Kapukaki, aka Red Hill, the military's response was to sue the department.· You have not only poisoned the waters that kama'aina need and respect, and which is the lifeblood of all life on this planet, but you are willing to poison and lie to your own families. To speak directly about Pu'u'uloa, you insist that your genocidal, ecocidal war machine installed on these lands is meant to protect us.· In reality, the only reason this place ever got roped into the United States wars was due to the illegal occupation, turning this island into an unwilling target of war. Members of my own family in my grandmother's generation, who just immigrated to the islands, were killed from US artillery at the onset of these attacks brought on by the US command during the Pacific, into its	Please see General Response.



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		<p>endless conflicts.· You have turned Pu'uloa, once a breadbasket under indigenous stewardship, into a polluted graveyard.· You have no right to impose your death wish and your imperial death cult upon the people of Oahu, Hawaii, Pacifica, or the rest of the planet. You have no rationale to retain the lands to continue your legacy of desecration.· Your excuse for re-stealing Makua was that the air above the valley is good for flying aircrafts.· You trying to own the air itself?· Go find some other air to try to own. The only option is to let the lahui malama this 'aina, since you have demonstrated an inability to do so, from Kaho'olawe, to Kapukaki, to Makua, where you are testing white phosphorus, damaging our lands and people, in order to drop on other people's lands and people, which you are also illegally using, killing and stealing in Palestine and numerous other places, where a base has been installed without permission. We are not deluded.· There is no treaty. Your laws mean nothing here.· Your word means nothing here.· None of your lies and false promises eclipse our desire to thrive and take care of each other and this irreplaceable 'aina.· Time is up.· Go home.· Aole RIMPAC.· Return Makua and all crown lands.· Free Palestine.· Free Kanaky.· Free Hawaii, land back to indigenous peoples worldwide, for the sake of all our lives. Ku kia'i Hawai'i.</p>	
Michele Napuunoa		<p>Aloha.· Hi, everyone.· My name is Michelle Napuunoa.· I'm not from this part of aina, and I wasn't going to say anything.· I just came to hold space for the people of this place. But as I listened this is a lahui.· This is a people's problem. . . . . Sir, you're a veteran, you're a colonel. You look like a lifer, so you're probably going to be a general one day.· And when you're that general, I want you to remember this day.· Remember my kupunas talking to your kupunas.· Take them with you.· I'll let them go with you to wherever you need to go to talk to the higher ups.· To talk to their kupunas because they speak through me. . . . . I am of the fourth generation that is finally woke.· And what does that mean?· That means my great-grandfather was put into World War I.· He was born into the Kingdom of Hawaii, and his country was taken, and he was made a soldier, John Makahiko, Kipahulu, Maui.· He was made</p>	Please see General Response.

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		<p>to fight your war, not ours. . . . My grandfather, World War II, James Matsui was a soldier fighting your war, drafted. My dad, 80 years old, Buddy Napuunoa, drafted, again to fight your war. They are all occupied. Their aina, their minds were occupied by a pledge of allegiance to a country that was not ours. But I am taking a pledge to the Island of Hawaii, to our Kingdom of Hawaii to say that I am de-occupied aina. This aina. . . . When I walked in today as a guest I saw blue and white police cars, some gentlemen with guns. Is this a welcome that you have to the people? You are the guest in this space. We didn't need blue lights. Those honorable blue and whites could have sat down and enjoyed themselves and learned a little. No one needed to stand at attention. We come with armors of prayer with aloha, with love. And, now, all of these de-occupied minds come with education. . . . My niece, God bless her, is an officer in the Air Force. She decides that she wants to crack the nut from the inside out. She wants to be a part of the solution together with the military. . . . Together as kanaka maoli together wearing the same soldier boots you have on, honoring her country, while honoring the High Hawaii. She walks every day in two worlds as a Kanaka Maoli, as a proud, proud granddaughter of soldiers, and then she has to fight your war. This is a war of the mind that we are fighting here. . . . Number one, everything we learned happened in kindergarten. Clean up what you will make messy. Take all of your things out of all our aina, clean it for the health and safety of whoever you leave behind because I'm sure you're still going to have some people on some bases. Yes. I can. What I'm asking from you is to hear, not with this, with this. Feel our pain. I don't know where your land of your kupuna is. One day go there and see the tragedy that I know is there because you are in the land of my kupuna where tragedy is living every day seeing those displaced Hawaiians when there is land to be lived upon. . . . Sorry for the emotion and the tears, but I really appreciate you being here. You know why? Because our kupuna is going to talk it out. My kupuna is going with yours and you to wherever it is in the United States of America to make some decisions for peace for our people, for what</p>	

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		<p>the queen said is love for our Hawaiian people. I'm here to represent my kupuna who came before me and my children and grandchildren that will come after me, and hopefully, in a place that is clean, better than what you found it as. . . . Please, I implore you to not extend any leases. And if you do, a dollar -- a dollar is not economical. How about a billion dollars? Let's try there. You going to stay here, come on, pay for it. Just like Airbnb pay for it. Again, I appreciate your time. Thank you for everybody being here. Thank you for letting me speak. Mahalo.</p>	
Michele Napuunoa		<p>Aloha everyone. Colonel, we meet again, and you've got a friend. Ma'am, what is your name and your ranking? [MS. SULLIVAN: Hi, I am Colonel Rachel Sullivan. In a little over a week, I will replace Colonel McGunegle as the garrison commander for Garrison, Hawaii.] It is interesting to meet you under these circumstances. I wanted to get to know who you were, as yesterday, I introduced Mr. McGunegle to my ancestors, and now my ancestors will talk with yours. And they will go with you wherever you go on every deployment until you help our Hawaiian people get our aina back. In a good way, I know this is heavy kuleana, responsibility that you take on as a job. I'm not anti-military, because I know in the world there is war. I know that people need to protect themselves. And that's what this is about. Environmental impact. Look at the community, the impact of hearing bombs, of knowing that the wind could carry poison, that's the impact, the greater impact, the unseen impact. Just like my kupuna, unseen, but they are here. They're here with all these people. All of the military people you bring here, they all bring their kupuna. And there's a different conversation happening there, hopefully one of peace. And I hope that in your military service it is not to fight a war, but to find peace. Senator Fevella referred to Saddam Hussein. Okay. So quick history lesson. Saddam Hussein, he was from Iraq. He invaded Kuwait, okay? And he made a provisional government. Does anybody know what a provisional government is? That happened here in Hawaii -- I'm going to go over. That happened here in Hawaii, a provisional government and</p>	Please see General Response.

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		<p>then fake annexation. Okay. So Saddam Hussein is in Kuwait and the world, 42 countries, the United States of America, we send in troops, troops that I assume were trained in these lands, on this aina, to help a country who is occupied become unoccupied. That does not make any sense. I mean, history, common sense. But we spent years. Persian Gulf War one, Persian Gulf War two. Yes, I have family who served in the military in both of those wars. Maybe you have friends, families, and comrades that you know who have had the effects of those wars. But right now, this state is military occupied. This government is not the government of Hawaii. This is a sovereign nation that has been occupied for 131 years. But the U.S. government wants to go help the other guy get out of the other guy's country who's being occupied by military occupation. This makes no sense. Like, we need to have some history lessons given out to the colonels, the general -- the soldiers to understand where you stand, where you are. And it's not to say that you're not doing your job, because you're doing a job because you need to take care of your family. I get that. I understand. I understand humanity. What I'm saying, if there's anything you take away when you walk away from here, it's to know the history of the place that you lie your head at night, to know the history of my people, to know that we're already oppressed. But then we're going to go help your military, help the oppressed over there. What is going on? Enough military training. Maybe -- I don't know. Maybe it's happening. We need to have some peace training. We need to have some diplomacy. You know, that's the art of compromise, diplomacy. We need to have conversations face-to-face, tough conversations without guns. Thank you. At least, the police and all the guys is actually sitting tonight and taking a relax. But this does not make any sense. We're helping you prepare for war where there is war on our soil. But the Hawaiians are peaceful, so we're not fighting with guns. Again, fighting with our education, fighting with our knowledge, fighting with our prayers, and fighting with aloha. I will wrap it up. Again, couple of history lessons. Go watch Saddam Hussein's interview. He said it in an interview: I will</p>	

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		<p>deoccupy Kuwait once the superpower of the United States of America deoccupies the Nation of Hawaii. We are occupied, so we're actually -- this doesn't make any sense. None of this makes sense on, like, the common sense level. Take that away. I don't know. You probably had to go get educated to get all those things on your shoulders. Educate yourself on history. Which side are you on? Whose war are you fighting? It is not your war. Just leave.</p>	
Goji Navarro		<p>Aloha kakou. Aloha, Colonel Steve. Mahalo nui loa for being here. But I am not here by myself. I wear her colors today, if you know who she is. She is our mo'i, our queen. She stood alone in her room, and I will share this experience with all of you. . . . Because of the fact I wait with her behind the windows she looked down, guns pointing at her. I -- you know, I have to say that this is an -- an honor. We are honored. I am honored to be among the -- all -- all of you who stand and believe in what we -- we know. And it is our aina. . . . I bring my kupunas with me. My mama, my father. Because of the fact that growing up, I'm from Kapahulu, but my heart is out here with my people, our people, Steve. And I've been listening to all of the words and, believe me, I have taken it all in like the queen has taken it all in. And she had every right took away for her people. . . . She had every right to have the -- to say, you know, take it upon yourself because you have to take it upon yourself. You, you, you, you, and you need to take that responsibility and listen. Truly listen to what our people is saying. . . . Not easy to be by yourself. The queen stood by herself and cried, and I had that experience with her. I cried with her. I have not told this story, but I have, so I know how she feels. I do know how she feels and mahalo all of you for sharing. She hears you. She does. She hears all of you. And the one thing that we know of is, say it, A-l-o-h-a, aloha. Mahalo.</p>	Please see General Response.
Honu'aina Nichols		<p>Aloha mai kakou. O wau 'o Honu'aina Nichols. I'm a Kanaka Maoli. However, I am not from Kahuku, but I have kuleana to malama aina and the ahupua'a of Kawailoa. So I pass through Schofield Barracks each time I go to work. I work as an aina-based climate education kumu that has taught with schools like Kahuku</p>	Please see General Response.

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		<p>High School about the damages the U.S. military has caused to our people and to our aina. I stand before you today to urge against the renewal of any military leases on stolen Hawaiian Kingdom lands in the year 2029. I know this is not your decision alone, but I ask you not to defer any responsibility because of your higher-ups. That flag you wear represents a longstanding history of occupation, mismanagement, and negligence for the people you claim to protect, when the only thing you're really protecting is your national security and imperialist agenda across the world, sending occupied people to fight your wars. I have fears of you, Colonel, hearing our mo'olelo falling in love and being turned over for us to just have to educate and educate again and again so that this cycle becomes endless. I ask you to listen closely and listen with your heart. It is absurd that the military was allowed to rent these lands for \$1 while more than half of Kanaka live outside of Hawaii. 6,332 acres of land is crumbs to your imperialist system, Colonel. But that is so much for us. Let me remind you that this dog and pony show for consent is unwarranted and unlawful on the international stage, as our people never relinquished our sovereignty -- almost pau -- on January 17th after the U.S. Navy invaded our shores, committing an act of war against a neutral state. But since we are engaging in this bureaucratic process where somehow you're sitting there and we're left to fight for existence, we have a duty to our planet, sir, We do not have time to entertain an environmental impact statement, especially one that admits that there are significant adverse impacts on land use. You have harmed our iwi, our kupuna, let Kanaka Maoli and the people who have kuleana to this aina ho'ike Hawaii We demand you clean up your mess and malama honua. But honestly, you've never been good at that, anyways. All you've done is poison our waters, desecrate our iwi, and poison your own people, as well. The U.S. military consumes more fossil fuels and energy -- almost pau, promise -- and energy than most countries and is the world's biggest greenhouse gas emitter. We can't effectively tackle climate change because the U.S. military is privileged to get away with not properly reporting your impacts on our native species and</p>	

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		<p>our people and our aina. I call for a thorough evaluation of the environmental impacts of your training areas, including greenhouse gas emissions and its contribution to climate change. I do not want my grandchildren testifying at another one of these meetings in 65 years. For once in your harmful history, may you be able to make a decision that can begin to restore generations of eha, something our keiki -- you can actually give something to our keiki to walk on without fear of unexplored ordnances and land they can feed off of. It's time for the U.S. military to leave. Mahalo.</p>	
Honu‘āina Nichols		<p>Aloha mai kākou.                      O wau o Honu‘āina Nichols. I am kanaka maoli, however I am not from Kahuku but I have kuleana to mālama āina in the ahupua'a of Kawaiiloa. So I pass through Schofield Barracks each time I go to work. I work as a ‘āina based climate education kumu that has taught with schools like Kahuku HS about the damages the US military has caused to our people and to our ‘āina.                      I stand before you today to urge against the renewal of any military leases on stolen Hawaiian Kingdom lands in the year 2029.                      I know this is not your decision alone but I ask you not to defer any responsibility because of your "higher ups" That flag you wear represents a long-standing history of occupation, mismanagement and negligence for the people you claim to protect. When the only thing you are really protecting is your "national security" and imperialist agenda across the world. Sending occupied people to fight YOUR wars. I have fears of you cernoll hearing our mo'olelo, falling in love and being turned over just for us to have to educate and educate again and again so that the cycle becomes endless. I ask you to listen closely and listen with your heart.                      It is absurd that the military was allowed to rent these lands for \$1 while more than half of kanaka live outside of Hawaii.                      6.332 acres of land is crumbs to your imperialist system cernoll, but that is SO much for us.                      Let me remind you that this dog and pony show for consent is unwarranted and unlawful on the international stage. As our people never relinquished our sovereignty, since our kingdom was usurped</p>	Please see General Response.

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Lei Niheu		<p>Aloha kakou. Everybody. I'm not from Kahuku. I'm from Hawaiian homestead. And I want to thank the people of Kahuku and this area for allowing this to be a communal meeting. Okay. My name is Lei Niheu. I want -- I'm not standing alone, per se. I'm standing with the 40,000 signatories to the ku'e position, my ancestors, for which is giving me authority to speak today. And added to that is the 40 generations -- I stand on the iwi of my 40 generations -- who also giving me the authority to express my mana'o to not renew the</p>	Please see General Response.



Commenter	Submitted By	Comment	Response
		<p>leases, no sale, no extension. And the U.S. military got to get out of Hawaii. You're no longer welcome into our house. You came to our table. We greeted you and did all the wonderful things. But you spoiled everything. So you need to leave. I'd like to also -- to the -- all the speakers that also stood up here tonight, tomorrow night, and last night, who spoke in opposition, that I stand in solidarity, my family and the 40,000 tipuna and all those who are in support of no more leases to the United States military. Okay. We're carrying that. I'm standing alone, but I am not alone. Okay. Also, that gentleman, he brought up something pretty interesting, you know. He said that whole referendum thing. That's bullshit history. Okay. They immigrated the people here just for that vote -- okay -- because that's going on in New Caledonia. Okay. The immigrating people to change the vote over there. Okay. But what is really interesting about the World War II that he decided to bring up -- I was going to let that thing go, but I'm not going to let it go now -- okay -- when they went drop the bombs on Nagasaki and Hiroshima, yeah, the atomic bomb and the hydrogen bomb, the maker of that bomb was what? Oppenheimer. And so instead of dropping the bombs on the people who started the whole thing in Germany, where's -- where was that tactical decision there? It was not a tactical decision. It was definitely influenced by racism. And that's what we experience here. We have a history of military backed racism in our government. And all through the generations, I myself have experienced that in my own family. My brother joins the military, he comes back hating Hawaiians, because he couldn't be a Hawaiian while he was in the military, and he couldn't be white because the white people thought he was too dark, the Black people thought he was too white. So he grew up hating Hawaiians. So that's your history, not our history. And for the two sisters who brought up the most important points -- I mean, everybody brought up important points -- but the one that brought up about the EIS inadequate -- inadequate, right? It's under -- it doesn't have all the research, that needs to be thoroughly given more substantial evidence to what you're doing. And the other tita</p>	

Commenter	Submitted By	Comment	Response
		<p>that was high school mother of four who raised her kids, she's right. Military never provided any information about what they do with our lands, and here we have to prove ourselves why we need the land. You folks have yet to show your aloha. I was there when they started to stop the bombing of Kahu'olawe. I was afield in illegal access, though, but we tried to stop that bombing. Took a good 30-something years to do that. So we want to stop any renewals, any more destruction of the military influence on these islands and return it to where it belongs. I stand with my tipuna. I stand with my great-grandfather, who was also knighted by the queen to uphold that constitution. So here I am. I am the evidence of why I have to stand here and take -- take offense against you folks.</p>	
Michele Nihipali		<p>The Army has not been a very good steward of the Hawaii lands it has had access to for training. Bombing and blowing up Hawaiian land must stop. Our Aina is too precious to allocate for military training.                      No renewal for the Army to continue to damage and destroy Hawaiian lands.</p>	Please see General Response.
Gaylord Nishimura		<p>I oppose the Military Renewing their lease on Makaha land [please] put Hawaiian Lands in Hawaiian Hands. [signature] Gaylord [Kaneass] Nishimura 87-179 Auyong Homestead Road 8084751293</p>	Please see General Response.
David Nisthal		<p>Aloha mai kakou. (Speaking in Xinka). Hello, everyone. My name is David Nisthal. I vehemently oppose the renewal of the lease, and I oppose all illegal US presence in Hawaii. I am a displaced son of the Xinka people. We are the original caretakers of the lands of Jutiapa, Jalapa, Cuilapa, and Santa Rosa, Guatemala. My ancestors' bones are buried there. I am born and raised on Ohlone lands, currently known as "San Francisco, California," and I have lived on -- in Honolulu for the last 14 years. I am here tonight to stand in solidarity with my Kanaka Maoli relatives, because I, my family, my community, my ancestors, have been subjected to the violence enacted by the US war machine. The Civil War in Guatemala, that carried on from the mid-1960s to the mid-1990s, unleashed a genocide known to some as "the silent genocide," where over</p>	Please see General Response.

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		<p>200,000 indigenous Maya, Xinca, Garifuna, Nahua peoples were killed, murdered. The US military backed the civil war, both monetarily and through training the Guatemalan military to enact these harms that continued the onslaught against my people. And because of this, I cannot stay silent. From Guatemala to Ohlone lands to Hawaii, the US continues to enact this violence on the people and the land. Having served as a social worker, and now as an educator, I am well aware of the injustices and health disparities that are directly correlated to the illegal occupation that began 131 years ago. The US military has historically and currently displaced Kanaka Maoli, indigenous peoples of the Pacifica, poor folks, due to their illegal use of the land. That is the operative word, "illegal." The US is in violation of all human rights international law, because these islands do not belong to the US. It is illegally occupied. And the US continues to cause ecocide, genocide as their modus operandi. It is imperative that the US military leave Oahu, leave these islands, and leave every occupied place that it continues to cause this harm and is illegally occupying and devastating the people of this land. Those signs out there, they're full of deceit, they're full of lies. And they show the way that the US wants to commodify and extort and exploit all the people that they continue to harm. So free the land and free the people.</p>	
David Nisthal		<p>Wednesday, Aug 7, 2024                      To Whom It May Concern,                      I am writing to express my strong opposition to the U.S. Army's petition to renew its 65-year lease for lands in Kahuku, Poamoku, and Mākua. The Army Land Retention Project should not proceed due to the U.S. military's history of destabilizing communities and its harmful environmental practices. The U.S. military has a destructive legacy of thwarting local communities and harming environments. Historically, the military has destabilized regions worldwide. As a displaced</p>	Please see General Response.

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		<p>member of the Xinka people from Guatemala, where the U.S. military’s involvement in the 1954 coup led to widespread violence and genocide against Indigenous peoples, I am aware of how U.S. intervention directly contributed to the suffering of my ancestors and of Indigenous peoples in Guatemala.</p> <p>As a current resident of Honolulu for over the last 14 years, and an experienced educator and social worker, I am acutely aware of the ongoing injustices and health disparities resulting from the U.S. military’s activities in Hawaii. The military’s operations have displaced Kanaka Maoli and other local communities, and their environmental impact is evident in the destruction of natural habitats and pollution of water sources. The contamination of drinking water at Red Hill and the destruction caused by bombings on Kaho’olawe, and of lands on Oahu and its neighbor islands, give clear examples of this damage.</p> <p>Given this history and the evidence presented in various testimonies, I urge you to reject the U.S. Army’s lease renewal petition.</p> <p>Sincerely,                      David Nisthal, MSW</p>	
Shayna Noelani Dabis-Tom		<p>My name is Shayna Noelani Dabis-Tom. I am kanaka maoli born and raised 51 years. For decades I have watched the destruction and devastation that the U.S. military complex. have done to our 'Āina and communities. I definitely do not support the renewal of the military leases. I do Not trust the military especially in matter having to do with our drinking water. We want the military out of our homeland. Mahalo [Piha] for your time. Kū Kia'i Hawai'i Nei Me Ke Aloha, Shayna Noelani Dabis-Tom (teacher)</p>	Please see General Response.
Joy Nuuhiwa		<p>No lease on stolen land! The military presence in Waianae and Makua is unjust and not right.</p>	Please see General Response.

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William OBrien		<p>Dear U.S. Army Garrison Hawaii Public Affairs Office,  First off, I would strongly encourage you to consider the voices and opinions presented by the community in your decision-making process. Although the residents of Hawaii have hosted the U.S. military for well over a century, there is growing awareness of the costs this relationship has had on the environment and its people. I respect the need for suitable training grounds to keep military personnel properly trained and combat ready, since all life is valuable, but often this need has been met at the expense of people, community, and environment in Hawaii. Speaking for Makua as a lifelong resident born and raised on the Waianae coast, I support the relinquishing of the valley back to the residents of Hawaii. With the stipulation that a full and comprehensive clean up is arranged and met with military commitment to the extent and involvement determined by the community. My reasoning is based on the environmental concerns already presented in the draft EIS, and additionally the need for full cultural access to sites and land currently restricted to the area behind the fencing. And finally, Kanaka Maoli interests must be acknowledged given the historic injustices committed in these islands. The ahupuaa system runs from the mountains to the sea, and full community stewardship of this valley is essential to help address the concerns of food and housing insecurity facing not just the native Hawaiians, but the entire population of Hawaii. This concern is more pressing and paramount to any international threat alluded to in the U.S. Army's reasoning for retention of the valley. Please accept and acknowledge the lease end date in 2029.</p> <p>Thank you,  William O'Brien</p>	Please see General Response.
Dillon O'Claray		<p>Aloha, the native Hawaiian people, culture, land, and ideologies are in critical levels of endangerment. Please allow our land back for us to recover from generations of tragic loss. Please allow for our beautiful culture to breathe once again.</p>	Please see General Response.
Robert Oliveira		<p>RE: DRAFT EIS LEASE RENEWAL  Aloha mai,</p>	Please see General Response.

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		<p>On behalf of the Silva Ohana, I, Alike Poe Silva would like to express my mahalo for the opportunity to provide comment in regards to the draft Environmental Impact Statement for the proposed lease of lands utilized by the US Department of Army in the Hawaiian Islands. I speak on behalf of my kupuna in my private capacity as an heir to kuleana lands as well as in my public capacity as the caretaker and land manager for traditional customary Hawaiian burials and Hawaiian religious monuments, customs and practices throughout Waianae, but specifically in Makua. Therefore, I have a vested and private right and interest in the lands subject to the proposed lease renewal unlike public persons and the State of Hawaii.</p> <p>Since August 12, 2002, my father, Albert Silva, and I, have been recognized by the O’ahu Island Burial Council as lineal descendants to many identified burials of our family members in the area of Makua, Kahanahaiki, Kamaile, and Nene’u in Waianae District, Island O’ahu. My family are the constructors of Ukanipo heiau in Kahanahaiki and are recognized as lineal descendants to the burials therein as well. Furthermore, my father and mother was recognized by the Waianae kupuna council on May 19, 1989 as konohiki for Makua/Kanehunamoku. In my families religion, the Kane religion, Ukanipo is the location where our God Kane is consulted by man on earth. Although Ukanipo is in Kahanahaiki, Kane’ana, also known as Makua cave, which is the womb of papa in the kumulipo of the Waianae kupuka’aina, is located in Makua. It is from here that the first kanaka appeared.</p>	
Robert Oliveira		<p>Currently, our families have been prevented from accessing and therefore practicing our Kane religious and cultural practices while practitioners of other religions who are not from Makua are granted access and use of the area constructing inappropriate and improper religious monuments. Furthermore, they are not accustomed to the Kane religion and thus are also practicing inappropriate and improper religious customs. There are 32 Kane heiaus throughout Waianae wahipana from Ka Lae O Ka La’au to Pu’uloa to Ka’aumakua to Kukaniloko to Malamanui to Lihue to</p>	<p>Section 3.5.5.3 discusses the process by which cultural access agreements were agreed upon and safety protocols for cultural access at MMR.</p> <p>In addition to the measures discussed above in Existing Management Measures, potential mitigation measures for land retained at MMR would include the following actions by the Army:                      (1) review and update the Army’s public</p>

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		<p>Mauna Ka'ala to Puaea to Makua. Waianae wahipana is also known as Kanehunamoku or Ka'anani'au, the path of the sun and dividing time by seasons. This cultural context provides important cultural values of the Waianae Kane religion and requires vital recognition and protection.</p> <p>My private rights and interests, and that of my family's, as well as my Kane religious practices and customs will be severely and detrimentally impacted by all three current proposed lease alternatives as provided in the draft EIS. None of the lease alternative options considered in your draft EIS identifies nor acknowledges the existence of my private rights and burial interests as recognized by the State of Hawaii. Given the proposed lease renewal regarding said lands, in the interests of protecting my families burials, my private property rights as an heir to land patents, as well as the Kane religious monuments, practices and customs, I respectfully request the Army to acknowledge and include my private rights and interests, as well as the above mentioned cultural impacts and religious sensitivities in your final EIS.</p>	<p>engagement efforts to ensure the current various access programs are known and understood by the community, and (2) work with and NHOs and cultural practitioners to update and/or develop a mutually beneficial cultural access plan that facilitates and increases awareness of safe engagement with cultural resources and practices within the State-owned land at MMR.</p>
Kapili Olson		<p>Can everybody see my hand? Yeah. You guys all can see it, but nobody's paying attention to this. What is this? It's money. We're all sitting here blaming these guys. That guy was falling asleep last night. He slept for three testimonies. I don't know if you guys seen that. It's not his fault. I don't blame him. He doesn't care. He's here because someone tells him to be here. Do we have any state representatives here? They're gone. They're outside. I think the state representative should stay till the end. We're all here. So unfortunately, some people left that were for it. And I understand everybody has their own opinions. Do you guys know how long it takes to drive around the island? Takes three hours. You know how long it takes to drive across Texas? I drove from the middle of Texas. It took me six hours, and I couldn't believe that I was still in Texas. So last night someone said: Go to Texas. Because 10 hours, you would have went past your house three times over here. I'm more representing the dirt bike community. I'm a third generation</p>	<p>Please see General Response.</p>

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		<p>motorcycle rider. I have kids who are fourth generation. It's kind of funny because I pack one of them around -- their ages are 10 and 5 -- and the other one follows me. And the rough part is, I'm in these mountains right here, and I come across an unexploded ordnance that stretched from my fingertip to my elbow, right back here. You guys see that there's blanks being fired? Nope. I see 50 cal slugs out on the ground. So it's kind of rough believing that. No more than from me to where you guys are sitting at my camp, there's barbed wire that my kids have to watch out for. I don't know what I'm supposed to do with that. I'm not -- where am I going to put it? In the dumpster? I'm not sure. What I'm told is that just mark the location and they'll come grab it. It's been, like, five years. It's still there. There's more that's within 100 yards of where I park my car. That's all within our land I'm riding by with my kids. It's unfortunate that many of our riders had to leave. They all have other things to take care of, their kids they have to pick up. The last time there was a fire out there from one of the residents -- we're up there on the weekdays. We're not even allowed to be there on the weekdays. I, myself personally, again, was putting out the fires, riding around on a bike. We weren't supposed to have our dirt bikes. I was riding a bicycle putting out fires. But it's the military's property at that time during the weekdays. We got to ask for permission, and then you guys get it for a dollar. We have to pay thousands. We only get it twice a week. You guys get it the other five or whenever you feel like it. I've been up there for a long time, and I've also put on a lot of races myself. And I learned more about the land and the plants and animals from riding than I did from Boy Scouts. We make a footprint this big, but we get blamed for everything, the devil weeds and all this stuff. Our footprint from our tire is this wide, at most. But somehow it's our fault. But then there's a bomb right now that I found with my own eyes sitting out there. I don't know if it's going to blow up or not. I'm not going to find out. I also found simulator grenades and things like that, smoke bombs. So, yeah, my name is Kapili. That stands for bonding and</p>	



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		togetherness, if you guys were wondering. And the final thing is I'm Hawaiian by birth, but I'm American by force.	
Rachel Oppenheimer		Aloha. My name is Rachel from the Kona and Prudencio Ohana. I come here today, and I hold space for those who come before me, those who come after me, and those Hawaiians who wish to be here but had to leave due to cost of living while you access land for \$1. A 65-year lease will be coming up, and when I think of that, I see my great-grandfather, Pili Kona. My great-grandfather who made his signature of mark on Kauai's own ku'e petition. What is that, you ask? A list of Hawaiians who opposed annexation in 1897. When I see 65 years to the future, I can only see and wish for these lands to be filled with Hawaiians. This is our home lands, and these lands need to be given back to the rightful dwellers. So 65 years is what you ask of again. This lease should never have been given to the U.S. forces in the first place. These are crown lands -- crown lands -- which were to be set aside for Hawaiians, kakou. 2024, I stand here and verbally oppose your annexation in this day and age. We are not -- you are not tenders of the land, but rather destroyers of all that you see, touch, and walk on. So please leave and take your opala. We have been showing you aloha, but this reign is over. The next generation and generations to come after is a keiki of immersion charter schools. May they raise up to be warriors. And one more thing for side note, you people behind their selective services, I am a mother of three children, three boys to be exact. My son just turned 18 years old, and your letter came to my door. That is a threat. No children of mines with Hawaiian blood will ever serve your white man forces.	Please see General Response.
Catherine Orlans		Do not extend leases on O‘ahu or anywhere in Hawai‘i. Housing is in a crisis. Water is in a crisis. All of this caused by the military presence in our islands. The state lands are truly Kingdom of Hawai‘i lands and the state constitution of Hawai‘i protects Native Hawaiians rights to access to our cultural lands. As the stewards, the state of Hawai‘i should not be allowed to lease to the federal government or military. Period. We have be proven time and time again that the US military is incapable of doing no harm to the	Please see General Response.

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		<p>environment and the people here. In the eyes of the international courts, there is no treaty and the US annexation of the Kingdom of Hawai’i is still illegal - so again are these leases and extensions even legal?</p>	
<p>Jamaica Heolimeleikalani Osorio</p>		<p>My name is Jamaica Heolimeleikalani Osorio. I am a native Hawaiian, associate professor of indigenous and native Hawaiian politics at the University of Hawaii at Manoa, and a resident of Wahiawa uka. I come here today as a representative of my family, most of whom reside in Wahiawa, and within earshot of the ongoing military violence at Schofield, the <u>Lightning Academy</u>, <u>Poamoho</u>, and other proximal military installations. Military violence is a fact of living in Wahiawa, more so than I could have ever imagined when we first moved here in 2020. [...] In these and other ways, your ongoing military occupation is intimate and personal to me and to my ohana and many other native Hawaiians living in Wahiawa. I also come here as a representative of my lāhui, the native Hawaiian people who have, since at least the 19th Century, fervently protested and resisted US military occupation in Hawaii and the Pacific. I join the generations of kanaka who continue to fiercely protest ongoing American imperialism in Hawaii, and the use of Hawaii as a staging ground for the expansion of US empire. In this moment, I am particularly concerned with the way weapons training is facilitated in Hawaii in support of ongoing genocides in Palestine and West Papua, via the RIMPAC exercises and other international cooperative military operations. We are unwilling to stand idly by while these genocides become a material legacy of our people, our land, and our kai. Therefore, today I add my testimony to the thousands who have come before me, calling for a demilitarized Hawaii and Pacific, and a return of all stolen Hawaiian Kingdom and government lands, regardless of whether or not that theft took place via seizure, lease, or executive order. [...] There shall be no retention. The only appropriate response is the full and final return of our 'aina. That the Department of Defense chooses to position this ongoing military occupation as being in service to our security is laughable. [...] To add insult to incredible</p>	<p>Please see General Response.</p>

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		<p>injury, these processes of retention are nothing more than a performance meant to assuage public support for a modern land grab and further assault on Hawaiian sovereignty. The simple truth is there was no difference between the lands controlled by the US government, including Pearl Harbor, Hickam, Shafter, Schofield, Wheeler, and Kaneohe, and the 1.4 million acres of land under DLNR's administration. All these lands were stolen from crown and government lands, to which neither the US nor the state has title. For the military to be offering a swap of any of these lands is a simple slight at hand. While imperialism, colonialism, and empire-building is your mission and legacy, we refuse to continue to be made pawns in a game that sacrifices our 'aina and our keiki to irreparable harm, only for you to train your soldiers to take your death-dealing missions abroad in our name. You do not belong here. This is not your land. You have no lands with which to legally swap in order to retain these leases. And we will not acquiesce to your twisted charade of condemnation. Hawaii is a healthier, safer, and fuller place without you here. It is time for you to pack up your things, clean up your messes, and leave our home for good.</p>	
<p>Jamaica                      Heolimeleikalani                      Osorio</p>		<p>From our home, my children can hear the offensive morning parade of your colonial anthem every 8:00 a.m. At night, my children's sleep is regularly disrupted by your salute to war and waste, as your helicopters hover over our heads, and your soldiers fire off thousands of live rounds into the night.</p>	<p>Section 3.8.5.2 analyzes noise impacts and discusses monthly training notifications, and the U.S. Army Garrison Hawaii internal policies and procedures to reduce noise issues that may arise. To alert the U.S. Army Garrison Hawaii of a specific noise complaint, please call the Community Concern Line at (808) 787-1528 or send an email to <a href="mailto:usag.hawaii.comrel@army.mil">usag.hawaii.comrel@army.mil</a>.</p>
<p>Jamaica                      Heolimeleikalani                      Osorio</p>		<p>There is no process of evaluation at the disposal of the state or the US military that can assign a numerical value to what these lands mean to our people. In addition to being our kingdom and government lands, these 'aina are our relatives. Our people have endured nearly a century of extraction, testing, dumping, and shelling on these sacred lands. From the devastation on Kaho'olawe to the ongoing live fire training at Pohakuloa, the scars left on our landscape, the fractures in our precious watersheds, and</p>	<p>Please see Section 3.12.5 for information on environmental justice impacts.</p>

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		<p>the contamination of our sacred waters and soil is the only legacy of the US military. There is no fee that you can pay to balance that expense.</p>	
<p>Jamaica Heolimeleikalani Osorio</p>		<p>The US military presence in Hawaii has only ever brought increased economic, environmental, intimate, and political precarity to our lands and peoples. Everywhere we find vulnerability in Hawaii, we find the US military and his operations at hand. From the increased violence experienced by wahine, mähū, and trans people, to the deposits of depleted uranium at Pohakuloa, to the poisoned aquifer on O’ahu, to the outrageous rising cost of living, causing many of our people to leave the sands of their birth, or the ongoing threat of foreign attack on Hawaii, each of these are examples that are indicative of the ways Hawaii's genuine security is neither a priority or a possibility under US military occupation.</p>	<p>Please see General Response.</p>
<p>Jonathan K. Kamakawiwo'ole Osorio</p>		<p>Good evening. My name is Jonathan K. Kamakawiwo'ole Osorio. I'm a professor of Hawaiian Studies and dean of the Hawai'inuiakea School of Hawaiian Knowledge at the University of Hawaii. I am speaking in angry opposition to the Department of Defense's intention to secure an extension of leases for 6,332 acres of land on Oahu, in Kahuku, Kawaiiloa, and Makua Valley. The armed services of the United States have had pretty much unrestricted access to more than 1.8 million acres of crown and government lands since 1898, as well as the use of the Pu'uloa ahupua'a for its cooling station, dry dock, and eventual housing of the US Pacific Fleet since 1888. The great expansion of US control came as a result of us forces aiding and abetting the coup d'etat staged by about 175 mostly American businessmen and plantation owners, that forced the constitutional sovereign Liliuokalani to surrender to the United States in order to avoid killing American soldiers. Her action no doubt spared both your soldiers' lives and the lives of tens of thousands of our own people. But it also reflected her hope that the American government would not abandon its commitment to democracy, and would honor its numerous treaties of friendship and commerce with the kingdom. Instead, the US, unable to convince its own senate to pass an actual annexation treaty, settled</p>	<p>Please see General Response.</p>

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		<p>on a joint resolution in both houses, accepting the transfer of the puppet government it had helped create, as well as the crown and government lands of the Hawaiian Kingdom. Let us be clear that the colonization of our nation was opposed in writing by practically every native Hawaiian alive in 1898 -- in 1897. Both crown and government lands are property established by acts of the kingdom legislature between 1845 and 1850, signed into the law by King Kamehameha III. And like all property in Hawaii, is protected by law. Only the successors of the king are entitled to the crown lands, and only kingdom government is entitled to control the government lands. US presidents, over the first two decades of the 20th Century, set aside thousands of acres of those lands for the creation of Fort Shafter, Schofield, Wheeler, Hickam, and later, Kaneohe, Bellows, and Kaho'olawe. These military bases may have been beneficial to the United States of America and its strategic interests, but they were not obtained lawfully or ethically. And your military's greed for more land has resulted, since the 1960s, in these unbelievable leases. Some of them, like Lua'alaea, Bellows, and Pohakuloa, from Hawaiian Home Lands, an agency that is supposed to be placing Hawaiians in affordable homes and on farm lots. Instead, you leased those lands from the state for a dollar. American global security is being paid for by generations of homeless Hawaiians. Now you wish to extend those leases, perhaps in exchange for another piece of our lands, that your country has already embezzled. We most vehemently protest and demand that the United States military begin drawing down its forces in Hawaii, and consider other ways, such as diplomacy, to deal with nations the US considers threats. For whatever security the lands of Hawaii have provided, the American people owe a tremendous debt to the Kanaka Maoli. And your country -- your country should begin by vacating our lands, and beginning the cleanup left from years of military usage. It's the least you can do.</p>	
Malia Osorio		<p>Aloha mai kakou [AUDIENCE MEMBERS: Aloha.] Oh. Oh. No, no, no. It's all good. It's all good. Aole. Aole. I don't have written testimony prepared, but Heoli signed me up because we have to testify these</p>	Please see General Response.

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		<p>days. I joked on the way here, saying, "Isn't this a great family outing?" When, in fact, it's not. It's raining right now, and I want to ask, do you know the name of this rain? Her name is "Kuahine". Can we all say, "Kuahine"? [AUDIENCE MEMBERS: Kuahine.] Her more harder sister is Ula-ula. The winds that come and bless these lands, that come and give us this beautiful, nice Olu'olu, AC, comes from Mount Ka'ala. And in that way, we are connected to Waianae. Right? Her name is Waikoloa. And I want you to know these names, because these are inoa that are important to our 'aina, the inoa that -- that bless our -- our lands. The Ua, the Makani, they have stories. They have personalities. They have ika. They have stance. And they were here, and they will be here before any of us and after any of us. I put my kids to sleep every night. And on some nights, my kids, they rattle in their sleep because they hear your live -- your live Army training. They hear your -- your bullets going off, your bombs going off. On the way home, my daughter Kalewohi asks, "Mommy, what's that in the distance? There's a plume of smoke happening." I tell her that the military is bombing the lands. And I want to ask you, how can you wake up every day, thinking that you are doing something great? This is the biggest military discount I have ever seen. A dollar a year? Kama'aina will never get discount like that, not for an 'aina. And you guys go to sleep every night thinking, "I'm a hero, and I should get military discount wherever I go." Aue. Okay. Lāhui, I want you to be quiet for this one. Sir and ma'am, what are the names of the rain? Without looking at your notes, what are the names of the rain? Aue.</p>	
Mialisa Otis		<p>Aloha. My name is Mialisa Otis. I thank you for coming, again, but I really want to direct my attention right above you in that camera where the generals are at home, sitting comfortably. [...] I am disgusted that there's less than 5 percent of land that is being returned to the state in your EIS. It doesn't make sense to not give unused land back. [...]</p> <p>And I just want to repeat some of what I said last night, because some of you in the camera might be hearing -- wa, wa, wa, wa, wa,</p>	Please see General Response.

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		wa. But please take us seriously. I hope these testimonies aren't falling on deaf ears.	
Mialisa Otis		Hello. Aloha. My name is Mialisa Otis. [...] This is not a situation where the term, you broke it, you buy it, it doesn't fit in. You broke it, you fix it, and return it to the rightful owner in better shape. Don't even think of using your leftover unexploded ordnances as an excuse to keep the land. Here you are, getting the protocol community consultation of three meetings, three meetings in three days for decades of damages, just to check boxes that measly two-hour meeting met whatever requirements you have. Some of you might be hearing womp, womp, womp, womp, womp, womp, womp, but please take us seriously. I hope all these testimonies aren't falling on deaf ears. [...] And I close on behalf of the lineal descendants and iwi kupuna, we are putting the U.S. Army on notice. Mahalo.	Please see General Response.
Mialisa Otis		Makua Military Reservation is home to more than 40 endangered threatened species. In Kahanahiki Forest, there are canopies of 60-foot tall koa and kukui trees. The endangered and thriving birds of Poamoho, there are 17. Kahuku, there are 6, and Makua, there are 6, plus 44 plants. And the bird species are the ones that I mentioned, along with the haha, hapu'u, and mamaki, which the Kamehameha butterfly thrives off of. . . . There are still rare kahuli tree snails singing in the foliage. Then, of course, the O'ahu, elepaio and other endangered birds that are hanging on by a feather. . . . The valley also contains many sacred sites. For decades, the military used the valley for live fire training, which sometimes led to wildfires that destroyed native forests and desecrated cultural sites.	Sections 3.3 and 3.4 discuss impacts on native species, historic and cultural resources. Section 3.14 has been updated with additional information on wildland fires that have impacted the State-owned lands.
Mialisa Otis		Speaking of which, what have you done to include those who don't speak English, like Chinese, Filipino like the federal ADA law requires? Where would indigenous people be able to see this in their native language, and where can I get a copy of the entire EIS in Olelo, Hawaii, not just a summary?	Public notices have included the Public Affairs Office contact, for information and accessibility requests. The EIS is not available in 'olelo Hawai'i at this time.
Mialisa Otis		Some people that couldn't attend tried to call the number provided, and the phone lines are only open from 4:00 to 9:00 p.m.	The U.S. Army Garrison Hawaii is committed to transparency throughout the EIS process. The

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		<p>And why does the in-person testimony list start with the number 81? Are you trying to cheat the count of testifiers to meet the consultation requirements? [...]</p> <p>Speaking of which, what have you done to include those who don't speak English and need assistance, like the federal ADA law requires and the state requires? Where would indigenous people be able to see this in their native language? Where can we get a copy of the entire EIS in Olelo Hawaii, not just a summary? Mahalo.</p>	<p>community is informed through public notifications and announcements--including regular notices and announcements, regarding EIS drafts, updates, public hearings, and comment periods. These are distributed through local media, community bulletins, and posted on our official website and social media platforms to ensure broad visibility.</p> <p>As was done for the Draft EIS, the Final EIS will be made publicly available on the ERP, EPA and project website. The EIS is not available in ‘olelo Hawai‘i at this time.</p>
Mialisa Otis		<p>I would like a list of all warfare, including chemical agents, that were or are still being used. Are you doing something illegally that you don't want us to find out about, like you usually do?</p>	<p>Sections 3.6.5.1, 3.6.5.2, and 3.6.5.3 describe the current status of hazardous substances and hazardous wastes and their locations at KTA, Poamoho, and MMR, respectively.</p>
Madison Owens		<p>Aloha,                      My name is Madison Owens, and I strongly oppose the Army's Draft Environmental Impact Statement (DEIS) and any plans to renew the military's leases on O'ahu. Echoing the sentiments of the hundreds of individuals who provided in-person testimony at the Army's scoping meetings on July 9, 10, and 11, 2024, and in alignment with the 21,269 Native Hawaiian signatures petitioning against the illegal overthrow of the Hawaiian Kingdom, I urgently request that the lands be returned to the Kanaka Maoli people. It is time for the United States military to begin its plans to deoccupy and remediate these islands.</p>	<p>Please see General Response.</p>
Madison Owens		<p>Historical and Cultural Significance The DEIS inadequately addresses the historical significance of these lands and the military's presence in Hawai'i. The document references the apology resolution on page 3-14 but fails to acknowledge the depth of the generational harms resulting from the U.S. military-aided illegal overthrow of the Hawaiian Kingdom. These harms have been compounded by the ongoing occupation and abuse of these stolen lands by the U.S.</p>	<p>Section 3.2.4 discusses the loss of ‘āina experienced by public trust land beneficiaries, and Section 3.11 describes the Socioeconomic conditions and impacts from the Proposed Action. Sections 3.5 and 3.6, respectively, further discuss cultural access and UXO removal efforts to ensure these lands can be safely accessed by the public.</p>



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		<p>Department of Defense and its allies. <u>The DEIS overlooks the persistent resistance from Native Hawaiians and others over generations and fails to recognize the socio-economic impacts stemming from the military's initial promise to return these lands by the end of the Cold War.</u> The trauma and economic loss from displacing families and communities are immense and cannot be ignored.</p>	<p>Section 3.12 of the EIS addresses impacts on Environmental Justice and acknowledges significant impacts due to continued limited ability for Native Hawaiians to use State-owned lands retained by the Army.</p>
Madison Owens		<p>Environmental and Public Health Concerns The United States Army poses one of the greatest threats to O'ahu's environment, people, and culture. The military's presence has a documented history of contaminating drinking water sources, as seen at Red Hill, where "forever chemicals" continue to pose significant health risks. This DEIS fails to adequately address the potential for further contamination of O'ahu's water, land, and air, which would endanger the health and well-being of its residents. The military's activities, including the use of heavy machinery, aircraft, and other equipment, contribute significantly to global warming—an impact not sufficiently covered in the DEIS.</p>	<p>Analysis of impacts on and from hazardous substances and hazardous wastes, including PFAS and mitigation measures to protect natural resources such as soil, water, and air, is presented in Section 3.6.</p> <p>Analysis of GHG emissions associated with ongoing training and activities and effects on climate change is discussed in Section 3.7.</p>
Madison Owens		<p>Impact on Cultural Sites and Community The DEIS lacks detail on military training activities and their impact on sacred sites and cultural practices.</p>	<p>Please refer to the CIA in EIS Appendix B for information provided by interviewees. The CIA (page 152) summarizes the interviewees' observations, "physical elements have been introduced that have altered the setting in which cultural practices take place within the MMR project area. This is a general concept repeated throughout informants’ comments that Mākua Valley itself, including the project area, is a sacred setting, which is altered by the presence of military activity, and in particular, by debris (e.g., UXO) left by prior military activity that continues to adversely impact the landscape despite the suspension of live-fire training."</p>
Madison Owens		<p>It does not adequately address the types of contaminants stored and used,</p>	<p>Sections 3.6.5.1, 3.6.5.2, and 3.6.5.3 describe the current status of hazardous substances and</p>

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Madison Owens		<p>nor does it consider the psychological distress caused by military noise. The assumption that communities have become accustomed to such disturbances is erroneous and dismissive. No community should have to tolerate the sounds of war. Additionally, the report fails to account for the damaging effects on native and endangered species, further threatening the island's biodiversity.</p>	<p>hazardous wastes and their locations at KTA, Poamoho, and MMR, respectively.</p> <p>As discussed in Section 3.8, the Army training activities on O’ahu have generated noise that can impact nearby communities. Noise impacts are managed through adherence to Federal and DoD regulations, Army safety programs, and standard operating procedures.</p> <p>When operating in noise sensitive areas, unless required by the mission, all Army aircraft maintain a minimum of 2,000 feet above the surface of the following: national parks, monuments, recreation areas and scenic river ways administered by the National Park Service; national wildlife refuges, or wildlife ranges operated by USFWS; and wilderness and primitive areas administered by the U.S. Forest Service. The DoD’s Natural Resources program is consulted when USAG-HI local flying rules are updated or revised to minimize conflicts with wildlife and sensitive areas.</p> <p>Protected species at KTA, Poamoho, and MMR are discussed and analyzed in Sections 3.3.5.1, 3.3.5.2, and 3.3.5.3, respectively.</p>
Madison Owens		<p>Social and Economic Implications The DEIS must also recognize the socio-economic impacts, including the displacement and economic disenfranchisement of Native Hawaiians. For instance, 38% (N= 74) of those arrested for soliciting sex from a thirteen-year-old online through Operation Keiki Shield were active-duty military personnel (Hawai'i Internet Crimes Against Children Task Force, 2022). This statistic underscores the broader issue of militarization and its adverse effects on the local community, including increased violence against women and children.</p>	<p>Section 3.11 discusses crime trends on O’ahu based on Hawai’i Attorney General Crime Prevention and Justice Assistance Division data and Police Department annual reports.</p>

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Madison Owens		<p>Colonial and Legal Context The ongoing military presence in Hawai'i represents a continuation of colonization, perpetuating imperialism and capitalism, all in the name of national security, at the expense of Native Hawaiian sovereignty and environmental health. The DEIS must acknowledge that the Kingdom of Hawai'i was not a party to the United States Constitution, and the current U.S. legal system does not adequately protect Kanaka Maoli rights. The <u>disproportionate rates of poverty, unemployment, homelessness, and mental health issues among Native Hawaiians</u> are direct consequences of historical and ongoing colonization. Global Implications and Future Directions The potential renewal of military leases for another 65 years is untenable and poses a severe threat to O'ahu. The previous 65 years have already resulted in significant environmental degradation and social harm. The United States must recognize the legal and moral imperative to end its occupation and begin a sincere process of decolonization. The global community is watching, and continued occupation will damage the U.S.'s reputation and standing in international law. In conclusion, the DEIS falls short in addressing the full scope of the impacts of the military's presence in Hawai'i. It is imperative that the United States Army listen to the voices of the Kanaka Maoli and all concerned residents and take immediate steps to deoccupy and remediate these lands. The time has come to respect the sovereignty, culture, and well-being of the Hawaiian people. Thank you for considering my testimony. Sincerely, Madison Owens</p>	Please see General Response.
Kaleo Paele		<p>I hear-by demand that the US Military return all of the desecrated and stolen lands back into Hawaiian hands immediately. I am in support for the no action alternative whereas the Miki will have zero access to these lands. Hawaiians have suffered enough and many need these lands in order to build homes and or grow food such as our ancestors did before the military to control. Stop taking advantage of our aloha!</p>	Please see General Response.
Kilion Palauni		<p>Hey, mahalo. My name is Kiliona. I'm not ancestry from here, this moku, but I have ancestry to Kauai and Hawaii Island. I do teach over here though, and I see haummana of mine past in this crowd</p>	Please see General Response.

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		<p>and that makes me so damn proud because my largest piece of activism is education. . . . . So I'm not speaking on behalf of Waianae today. I'm speaking on behalf of all the kupuna before me and all the generations that will come after me. We are the people of this land. My ancestors died and became this land, fed the kalo that created my ancestor that created me, and I will become the soil that become the next generation's food. . . . . You guys don't understand that and that's the problem. You don't understand that we are this land. Desecrating this land is desecrating us, literally. . . . . This land was illegally occupied in 1893. There was no treaty of annexation. The treaty did not get two-thirds of the house votes. A joint resolution was passed which is not used for international suits. Therefore, today, Hawaii is still in a -- illegally occupied. You broke your own constitution to do that. There's no treaty. . . . . The audacity that you even have as a military to think that we would ever allow a renewal is ridiculous. The reason being, look what you've done already. Mokapu. You've dug up over 4,000 of our ancestors to build the Klipper Golf Course in the name of national security. You took Kaho'olawe, our sacred navigational island, and bombed it to the point where it's unsustainable today. . . . . You took Red Hill and poisoned your own people including ours. You made Pearl Harbor the breadbasket of Hawaii, the most polluted military base in America. American occupation for that matter. You guys have a history of not cleaning up. The pill boxes are evident of that. Military take up too much Hawaii. What we need is more of you out of here because we are being priced out. . . . . We make up 19 percent of the state's population, the illegal state. We make up less than 12 percent of this island's population. We are the minorities in our own land. 60 acres and, what, 60,000 acres is nothing to you considering all the land you already illegally occupy. . . . . We are the houseless. We are the homeless. We are the most incarcerated. We are the most impoverished. . . . . What Uncle Sparky said was right. We need a fourth option because the fact that you're not giving us that option is the same thing you did with statehood when you gave us two options to stay a territory or</p>	

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		<p>become a state. No independence, which is bullshit. . . . I think my shirt says enough of my positionality on this, but at the end of the day, I hope to God that you guys actually listen to all the people here. Because if that gets renewed we know that this was a bunch of bureaucratic bull crap, and our voices didn't even matter because I think we have spoken. Aloha.</p>	
<p>Healani Sonoda Pale</p>		<p>Thank you. Aloha. Healani Sonoda Pale. I'm -- I'm testifying tonight as a community member, and not on behalf of an organization. This is the third night I've been in attendance. So, so far, over the three nights, we had over 200 testimonies. Our people have spoken. They've said "no" to the leases. They said "yes" to the Army cleanup. They said "yes" for the Army to leave. They also asked, over these past nights, to extend the comment period. So I just want to make sure I get these comments in. So they -- they -- I think our people have been very clear these past three nights that we don't want any lease renewals. We want the Army out, and they got to clean up their mess. [...] Number three, you were asked to draft the DEIS, the draft EIS, into a human-friendly format. No one can read 2,000-plus pages. [...] Two thousand pages could have been condensed down to 10 pages. And all of us here could have been better informed about what's in there, which is not easily digestible. And it's also confusing because a lot of it is about overwhelming our lāhui. Okay. And then, also, lastly, I want to mahalo Ho'opae Peace Project -- Pono Peace Project for the mea 'ai, for the sign waving. I want to mahalo Lāhui Foundation for providing drinks to our lāhui all these nights. I want to mahalo Lāhui -- Ka Lahui Hawaii, Mutual Aid Ka Lāhui, for providing food and drinks, and making sure our lāhui was taken care of. Because when it comes down to it, we are going to take care of us. Did they bring -- did they bring food for us? Aole. Tricia did, today, but -- thank you. And also, I want to thank Oren. Oren over there, the cameraman. He's been --he's been filming, for free, all these events, and putting it on livestream so that our lāhui can watch and be a part of this. So, mahalo to all these groups for coming and showing up. And mahalo to our lāhui. Hopefully, you've heard us.</p>	<p>Please see General Response.</p>

Commenter	Submitted By	Comment	Response
		And that --- those are my comments for the draft EIS, and I'll put it in writing. Mahalo.	
Healani Sonoda Pale		Extend the comment period.	The NEPA and HEPA public review period for a Draft EIS is 45 days; the ATR-O‘ahu EIS had an extended 60-day review and comment period for the public. The Army is unable to accommodate a further extension due to timeline constraints for the future real estate actions following the EIS process.
Healani Sonoda Pale		Number two, what I've also heard these last three nights, to please include the historical injustices that the military took part in, that led to the theft of two million acres and overthrow of our nation. Also, what was said these past nights, you were asked to disclose all abuses that was done to our sacred 'aina, water, cultural sites, native plants, animals, and fish. That needs to be disclosed in full. In your draft EIS, there are contradictions. You state in your draft EIS that you need Poamoho for training. But then you also state in your draft EIS that you're not currently using it for training. For Kahuku, you list nine endangered plants, eight protected birds -- one of which is endangered -- two endangered damselflies, two protected invertebrates. But you only document one sighting. So what happened to all of these animals and plants and organisms, our relatives? What happened to them? Almost done. A	Impacts to water resources, cultural sites, and biological resources are discussed in Sections 3.10, 3.4, and 3.3, respectively. The species listed in Section 3.3.5.1 have the potential to be on the State-owned land based on geographic range and habitat, but have not been documented on State-owned land to date.
Healani Sonoda Pale		nd then, much of the land in question in Makua is conservation. So it is illegal for the military to use conservation land for military training. But in your EIS, you say you need these lands for military training. So there's all these contradictions. And having worked with the military and gone back and forth as a member of the CRI -- I'm not speaking on behalf of the CRI -- I understand how the military works.	Compliance with HAR Chapter 13-5, Conservation District, has been revised and is discussed in Sections 1.4.2 and 4.3.2. Sections 1.4.2, 3.2, and 4.3.2 have also been revised to state 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.
Healani Pale		Yeah. Thank you. Okay. Aloha. My name is Healani Sonoda Pale. I'm with Ka Lahui Hawai'i, a native initiative for self-governance and	Please see General Response.

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		<p>self-determination formed in 1987 by Kanaka Maoli, leaders on the island of Hawaii. . . . . This is a historic moment for our people. For over 131 years, Kanaka Maoli have burnt -- borne the brunt of the weight of an illegal military occupation that has alienated us from our aina, poisoned our wai, desecrated our sacred and historical sites, and destroyed critical habitats for native and endemic organisms. The U.S. Army's 65-year lease -- leases of stolen Hawaiian crown and government lands at Makua, Poamoho, and Kahuku on Oahu need to expire. . . . . The Army needs to clean up your opala, and the lands need to be given back to the rightful heirs, the Kanaka Maoli people. And that is just the beginning, because eventually we want every square foot back. All 51,000 acres that the Army occupies on Oahu. . . . . It is absolutely not in our best interest to allow the Army to renew their leases of 6,322 acres, which is home to dozens of endangered plants, birds, and fish, as well as the location of known and unknown sacred sites and important water features and sources. . . . . Let us not forget the U.S. Military's armed invasion in 1893 here on Oahu, which led to the loss of political power and the theft of two million acres of Hawaiian lands. Let us not forget the decades of violence and abuse our people have suffered under illegal military occupation. How can we forget Joseph Kahahawai, Kimo Mitchell, and George Helm? All victims. How can we forget the now uninhabitable island of Kaho'olawe, which was used as target practice for decades? How can we forget Red Hill, where 93,000 residents, many of whom were your own servicemen and women and their children, drank contaminated water with the Army's -- contaminated with the Army's fuel? And how can we forget Pohakuloa and the bombs still being dropped to this day? . . . . . These are not the actions of pono caretakers of this land, Papahanaumoku. And as people of the land, every bomb that is dropped, every chemical released, every burial desecrated, every tree burned, every nest destroyed is an injury to us collectively. And for what? . . . . . Hawaii is the command center for the U.S. military operations in Oceania. The training that takes place in Makua, Poamoho, and Kahuku is not for our safety and</p>	

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		<p>security, but, instead, is used in the oppression of indigenous peoples across Oceania and around the world to build U.S. empire.· If the U.S. Army was concerned for our safety and our security, they would stop poisoning our land and water. . . . . Their presence here makes a livable Oahu near impossible.· I almost pau.· Because like what happened at Red Hill, we are doomed to be the hapless victims of disasters caused by death games they play on our aina and in our moana.· And when the water is undrinkable, the fish inedible, and the land is beyond repair, no one will be held accountable.· No one will take responsibility.· Our children and grandchildren are the beneficiaries of our action and our inaction. . . . . The Army admits in their draft EIS that retention of these lands will have adverse effects on land tenure, the environment, water sources, and cultural access and practices in their own -- they say it in their own draft EIS.· The mitigation that is proposed to lessen the adverse effects is just the Army going through the motions and seeing what it needs to in order to keep control of these lands, our lands. . . . . When dealing with the military, it is important you learn this term.· We don't know what we don't know.· The U.S. Military is allowed to keep secrets from the public, even if it endangers human health in our environment.· And they have done this over and over. . . . . In the EIS, there are blank spots.· We need full disclosure in the draft EIS.· We need to know everything.· What's on our aina?· Is this the future -- this is my last one.· Is this the future we want for our children and grandchildren?· This is a once in 65-year opportunity to voice our opposition to Army retention of leases.· Do we want our grandchildren doing this in 65 years? The U.S. Military is destroying our island home and the only future worth passing on to the next generation is a demilitarized one.· And before you leave, please submit a written testimony. You can submit as much testimony as you want. There's a testimony table back there.· Aloha.</p>	
Ulupuhi Pale		<p>Mahalo. Mahalo. Aloha, everybody. [AUDIENCE MEMBERS: Aloha.] I oppose the lease extensions. It is time to heal the land, to heal the 'aina. Look back to haloa. What is the opposite of haloa? Ha iki is</p>	Please see General Response.



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		<p>short breath. And haloa was actually a man and a kalo. But if haloa was ha iki, then haloa wouldn't be making good decisions. Yeah? He wouldn't be breathing in fully, like ha loa, big breath. Ha iki is what the -- you – ha iki and ha loa decides whether you make good decisions or bad decisions, whether you are panicking, or whether you are relaxing, stay calm. Back to the Baibala. We are stewards of the 'aina; not destroyers of the 'aina. We are here to malama the 'aina, malama each other, and malama ke akua. It is our secret kuleana to malama. Mahalo. [THE MODERATOR: Mahalo nui. Oh. I'm sorry. Brother, can you state your name?] O Ulupuhi ko'u inoa. Mahalo.</p>	
Nathan Palmore		<p>The lands in question, Makua, Poamoho, and Kahuku, are home to dozens of endangered organisms only found in these lands. The draft EIS by the US Army itself admits that there will be "significant, adverse impacts on land use (land tenure), cultural practices (at MMR), and environmental justice". The US military can not be trusted as stewards of Hawaiian lands, as evidenced by such catastrophic incidents such as those at Red Hill and the summit of Haleakala. Following that historic record, any lands returned after a potentially extended lease can reasonably be assumed to not be returned in an unusable state, with no paths for accountability to the parties responsible.</p>	Please see General Response.
Avalon Paradea		<p>Re: Army Training Land Retention, Island of O‘ahu, Second Draft EIS Comments  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 18,000 acres of State-leased lands in Kahuku, Poamoho, and Mākua, once the lease expires in 2029. I am in full support of the No Action Alternative for all three locations, under which the State lands will be relinquished back to the State. The sections below explore my experiences and mana‘o for each of the three training areas.  Kahuku Training Area (KTA)</p>	Please see General Response.

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		<p>I feel strongly that the best option is the No Action Alternative at KTA.</p> <p>Poamoho</p> <p>From 2014 to 2015, I worked as a field technician intern with the Ko’olau Mountains Watershed Partnership (KMWP). One of the primary places we conducted our work was in Poamoho. Although the areas we worked were not within military-occupied lands, conceptual barriers do not separate these lands – what occurs in one place inevitably leads to ripple effects nearby. My experience in Poamoho was beyond words... lush native forests, incredible native plants and birds, and clear, flowing streams that nourish us all. These natural and cultural resources are at tremendous risk when military activity is happening mere miles away. Our watershed is especially fragile on O’ahu. No amount of so-called military “readiness” is worth damaging our stream systems. In order to protect this cherished ‘āina, the No Action Alternative is the best course of action for Poamoho,</p> <p>Mākua (MMR)</p> <p>I am hardly the most qualified person to explain why the US Army ought to have ceased operations in Mākua decades ago – I have no doubt many, many others will be submitting strong testimony opposing continued occupation of this ‘āina – yet I will still add my voice to the mix and say that enough is enough.</p> <p>Mākua is a beloved place and people have been fighting military occupation of this land for a long, long time. The only way to preserve cultural history and ongoing legacies in Mākua, as well as the welfare of the ‘āina itself, is to enact the No Action Alternative in MMR.</p> <p>Conclusion</p> <p>I implore the State to recognize the need to return these lands to State management, in order to remove the US Army from causing future tragedies to these ‘āina. Mahalo for doing what is right for the continued health and prosperity of our communities.</p>	

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Avalon Paradea		<p>Kahuku Training Area (KTA)</p> <p>In 2014, I worked as an archaeological field technician under the Colorado Environmental Management of Military Land (CEMML). Our small team of five was contracted to conduct a five-month survey assessing several portions of the training area for archaeological sites. We found no less than 60 sites of interest during our contract period, including several large heiau and numerous walled features. I was the only local hired by CEMML, and it is worth noting that I am both haole and not raised on O‘ahu. The majority of the rest of our crew were flown in from Colorado for the express purpose of conducting this survey. It is vital to point this out, as it speaks volumes to how little the US Army cares in regards to A) providing career opportunities to both Kānaka Maoli and local archaeology firms and B) having a competent team of professionals who have experience working in our unique, storied environment. I had to teach every single person on my crew about Hawaiian history, including the sites and features we encountered. With the exception of my supervisor, none of the rest of our crew cared at all about what we were doing, and two of these folks expressed genuine racism towards Hawaiian culture. Notably, there were no attempts by CEMML to touch base with local families or cultural practitioners after our survey ended to share our discoveries with them. The Army needs to be transparent about cultural sites with the surrounding community.</p> <p>While the areas we surveyed were not within the State-leased lands, the second draft EIS makes it clear that damage has been caused to sites within the State lands. These sites are consistently at risk as long as the Army occupies these lands.</p>	<p>Section 3.4.5 of the Draft EIS discusses the known extent of cultural resource sites within the ROI as well as recorded impacts on sites.</p>
Avalon Paradea		<p>Additionally, there are unique and endangered native species found within Kahuku which are persistently threatened by military activity. Noise, wildfires, and pollution caused by the Army are only a handful of serious problems that affect their wellbeing.</p>	<p>Please see Sections 3.3, 3.7, and 3.8 of the EIS for information on biological resources, air quality, and noise impacts, respectively.</p> <p>Wildland fire impacts on biological resources are addressed in Sections 3.3.5.1, 3.3.5.2, and 3.3.5.3, respectively.</p>

Commenter	Submitted By	Comment	Response
Cassandra Park		I strongly oppose this proposal to retain lands that the US Army has continued to occupy in Hawai‘i. The US Army has not shown any respect or dignity for the land or its people. Land is our family, we come from the land. There is no remorse for the harm caused by the US Army and the continued occupation by the US military in Hawai‘i. Enough is enough.	Please see General Response.
Mananakealoha Pascual		Aloha nui. Aloha no, aloha no, o Mananakealoha Pascual ko‘u inoa, he kupa no au mai ka ‘āina o Maui I'm here for my Oahu ohana, and stand in strong opposition to the lease renewals; and instead vote for a "no renewal" alternative. I was invited into Makua with the Hawaiian language class, with Kumu Ali, where a tour was led by the military officials.· These military officials nonchalantly led us to walk all over the sites, in a manner that very clearly showed their ignorance in preservation and lack of qualification to steward these -- to steward these areas. At one of the sites, we were surrounded by trees scorched by the fires of aerial ordnance, dropped by military aircrafts to simulate the mass killings in the name of global terrorism.· These games, that you call them, war games, each one of them an environmental disaster in itself, that tortures and furthers the endangerment and extinction of our flora and fauna. The land is left riddled with pollutions of fuel, poisons, and unexploded ordnance, and the remnants of exploded ordnance, too.· It's bad enough to be the standing military force of the illegally occupying American colony, but you'll also leave our agricultural lands inaccessibly devastated in an effort to force out -- to force our participation in American consumerism. The government has acknowledged the existence of a Hawaiian sovereign -- sovereign entity before.· This is from the definition of Kaho'olawe in wikiwiki dictionary.· This is from the 1993 Hawaii state legislature passed, Chapter 6K, Hawaii revised statutes, which states, "Upon its return to the state, the resources and waters of Kaho'olawe shall be held in trust as part of the public public land trust, provided that the State shall transfer management and control of the island and its waters to a sovereign Hawaiian -- to a sovereign native Hawaiian entity upon its recognition by United States and the state of Hawaii.	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>And now, with that being said, the fake state of Hawaii has no jurisdiction to renew American military leases on the crown lands that were seized by the colonial government. The power resides with the aforementioned sovereign Hawaiian entity. Aloha.</p>	
Atalina Pasi		<p>Maile lei and aloha. My name is Atalina. Today, we gather to address a critical issue that strikes at the heart of our community's identity and future, the renewal of the military leases for the Kahuku Training Area. This decision isn't just about land use. It's about the restoration of culture, ancestral knowledge, and our sacred connection to the aina. For generations, our ancestors have stewarded this land, passing down not just physical spaces, but a profound understanding of how to live in harmony with nature. The Kahuku Training Area, with its rich biodiversity and cultural significance, stands as a testament to our heritage, a heritage that is now under threat. The military activities on this land disrupt not only the natural environment, but also our cultural practices. Our sacred sites, gathering places, and places of ancestral significance are at risk of being desecrated or lost altogether. The noise of artillery shells shatters the tranquility that once defined this place, and the environmental degradation caused by military exercises threatens the very ecosystem that sustains us. But today, we stand united in opposition to the continuation of these leases. We demand more than just recognition of our concerns. We demand action to restore what has been lost and protect what remains. Our culture is not a relic of the past. It is a living, breathing part of our community today, and it deserves to be honored and preserved. imagine a future where the Kahuku training area serves as a beacon of cultural restoration and environmental stewardship. A place where traditional knowledge is shared and celebrated, where the aina flourishes under our care, and where future generations can learn from the wisdom of our ancestors. Let us not forget that our responsibility extends beyond our own lifetimes. We are custodians of this land for those who will come after us, and it is our duty to leave behind a legacy of respect, harmony, and sustainability. In conclusion, I urge to heed the</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>voices of our community. Let us prioritize the restoration of culture, ancestral knowledge, and the aina over short term military objectives. Together let us forge a path forward that honors our past, protects our present, and ensures a vibrant future for our keiki. Mahalo.</p>	
Hannah Passey		<p>Land Back. Your presence on these lands perpetuates ecocide and genocide. You are not welcome here.</p>	<p>Please see General Response.</p>
Nani Paterson		<p>Aloha mai kakou. I, too, wanted to mahalo everybody, first and foremost, yeah, for showing up, for engaging in this very important issue. Right? So many freaking powerful testimony, and from a lot of people that we don't usually see out there. So, mahalo, because it's a kakou team. We cannot do this without you guys. Our ohana. That's all of us. Yeah. We ohana. And we understand what that is, because we understand aloha. I -- I'm going to bring a little bit different kind aloha today. But I wanted to remind you guys, like, I look at ho'ailona. Yeah? And you guys saw the clouds. You guys saw sky. You guys felt the rain. The kupunas is crying in happiness because we showed up. We showed up to protect what they love. And we ain't done. We're not done, kakou. We cannot be done, because they're going to do whatever the freaking hell they like to take over everything that our kupunas loved, that our ancestors loved. And we know what's right. We know what's pono. And so Andre had mentioned earlier about organizing. We got to organize, kakou. Right? Like, seriously. You guys all look at the fluke of all of that bullshit in that book, all the wordplay? I stayed up late last night, till, like, four o'clock in the morning, tweaking on the freaking EIS. I couldn't understand some of the words that they were saying. So I go look at the dictionary. But then I thought, "Oh. Maybe the military get different terminology for" – sorry, Kehau. [THE MODERATOR: Go ahead.] (Unintelligible.) Mahalo. The military get different terminology. Yeah? I'm not in the military. I don't know anything about that. But I know Alpha, Delta, Foxtrot, all of that. Right? I know they got to communicate that way. So I ended up going online and just checking. "Hey, what is the military terminology for this word?" Austere? Austere? 'Ae. Kali. You</p>	<p>Please see General Response.</p>

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		<p>cannot answer that question.· Yeah?· Austere environment.· Can you tell me that?· Aole.· Okay.· So when I look in the EIS -- and I just saying this because we need to be more, like, understanding.· We need to maopopo.· Yeah?· We need to actually really delve into the words that they're playing with.· 'Ae. Hold on.· Okay.· So it -- I can't find it anymore.· It read something about the environment is steep, the hills are steep, rocky, all of that. Okay.· So -- and then I pull up the Internet, and then I pull up US Army website.· There's a little article in there.· And I'm just going to read a little bit, because, holy shit, this one, I could freaking trip my mind. "We operate" -- and this is about how they prepare our -- their military to train.· Right?· "We were decisively" -- okay.· This is in regards to an engagement between Iraq and Afghanistan.· Yeah?· And so, a little snippet.· "We were decisively engaged in Iraq and Afghanistan.· So the mentality was -- so the mentality was unit would come here, fall into one set of pre-existing set of equipment, facilities," blah, blah, blah, blah. Okay.· This is the important part.· "We operated this particular way.· We're not going to fight the next war that way.· We're going to fight the next war in an austere environment.· What 'austerity' means is you do -- you do an invasion of a country, whether it's land or sea.· You establish a bridgehead or a beachhead, and you start pushing troops out." Yeah.· All of that, again, is bullshit. They've taken over our lands, and they're trying to obliterate us.· 'Ae.· We cannot stand for this. Hold on.· Aloha.· Mikey had shared something earlier today about you not bringing food. I shared something with you guys as well yesterday about bringing somebody higher than you.· Because we never, like, talk to you.· We wanted to talk to them, over there, in the camera, watching us all night long.· This is day three for a lot of us here, in all of this bullshit conversation, just one side. And so, in Hawaii, we kōkua I kekahi I kekahi.· Yeah?· We help each other.· So I'm going to show you a little bit of how we help, because yesterday I told you I'm going to do something for you, for help you.· Here's your Q-tips. I hope that helps to clean your ears, to clear your ears so you hear us better.· But I don't know that you did.· And so I can come a little bit closer so you can read</p>	

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		<p>my shirt. "No lease on stolen land. US military out of Hawaii." Sorry. Last thing, I promise. I promise. So I shared with you guys I'm an Olelo Hawaii teacher. I know my kuleana, unlike you. But I want to teach. Right? And so I'm going to share this. And I want to first mahalo Kauwila for always instilling kūpuna 'ike kupuna mana'o to all of us. And if you guys don't know who he is, go check him. Go check him. Go. Instagram. Right? Kakou, can you please read this for me with aloha. ke olu olu - just this part. Ready? It says -- ho'opili mai. "Ho'opili mai" means to mimic. Hele pela. E ho'opili mai. Hele pela. Hele pela. Okay? Ready? Okay. So let's say it three times first. E ho'opili mai. Hele pela. Hele pela. Hele pela. "Hele pela," in Hawaiian, means this. Can we tell them together what "hele pela" means? Hele pela. "Hele pela" means "Fuck you." Fuck you guys, for all you guys did, all you guys still doing. You guys don't give a shit about anything. Hele pela. Hele pela. Hele pela. Because we said, "No."</p>	
Kaleo Patterson		<p>Hello. Good evening, Colonel. Kaleo Patterson. I'm the priest at St. Stephen's Episcopal Church, just up the road, and so this really close. I was born in Wahiawa, right around the time of the Korean War. My father was a soldier at Schofield. And for the last 10 years, I've been on the Native Hawaiian Advisory Council. And it's been very, very important to be there, to be able to review and to see the projects and the proposals related to military training and so on and so forth, and all the things that the Army, at least the areas that we're talking about. And that's been a good experience. And I wish that there was more communication with that Native American -- Native Hawaiian Legal Native Advisory Council, more interaction with the community, and, you know, more efforts to really work with the community and educate the community on the things that are happening, very important things. We've seen a lot of impact, environmental impact, on the lands. And that conversation needs to expand. We've seen in the community numerous statements and resolutions on apologies for -- for the history. And I -- I think the Army and the armed forces need to really commit to disseminating those resolutions, like the US Congress apology and reconciliation</p>	Please see General Response.



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		<p>process. United Churches of Christ have a -- has a resolution from 1993, a very strong resolution. And the Association of Hawaiian Churches has a resolution titled -- it was passed two years ago on the national level -- titled "Ending the 128-year War Between the -- the US Army and Native -- Native Hawaiians." And just this summer, the United Methodist Church passed a very strong resolution called an "Apology Resolution." And so we'll see what these these churches can do to bring that education, that knowledge into the community, all the history that comes with it. And really quick. But I -- I think there's a commitment on the part of the armed forces to really do more education on the history. And I know, every September 2nd, for the last 10 years, we've had services on Schofield, on the queen's birthday, and that's been an opportunity to do education on that history with the leadership. And we have some new leadership coming in this year. And, Colonel, you've been here for a couple of years. You've also come into the community and have attended some of the reconciliation services on January 17. Hopefully, we can have somebody join the peace march and learn a little bit more about that on January 17 as well, just a little bit. But I have a member of -- of our church who's here today. Where -- where is Richelle? And she's with the Gaza Coalition, and has words. And I thought I'd yield some time to her, to just say a little bit about what's happening in Gaza. And we Hawaii has been associated, compared to the Palestinians for many years. And I'm just going to give her a little bit of time to talk about what's going on.</p>	
Eric Paulo		<p>Good evening. My name's Eric Paulo, and I've been living in this community for 40 years. And I want you to renew your lease. I'm for it. I have a reason why. But first, I want to talk about so many people in the back here say it's about unsafe and all that. I used to be a prize fighter. I used to be a prize fighter, okay. I used to run up there. The soldier saw me, you know: Hello, Shaka. You know, I rode back down. I do this most of the time when I was, you know, training. I have no problem with them -- you know, with the soldier. But I -- I have a reason why. This is my reason -- reason why</p>	Please see General Response.

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		<p>I support them. Because I feel like we need space for young men, young ladies, to train, you know, to continue to -- you know, to guard a country, you know. I love the United States of America, okay. I'd put some more, but I -- you know, I'm American. The past is the past, whatever, you know, the hard feeling is. But also, you know, I -- I'm also a union member for 40 years. And, you know, military do a lot of, you know, program that support the community. Like I said, you know, I hear somebody talking about Palestine and all that, you know. Yeah, those people are terrorists, just straight out, okay. They invaded and they still holding hostages, you know, some of our citizen. That's all I say. I support the military.</p>	
Randi Pavao Jones		<p>Keep Hawaiian lands in Hawaiian hands. Stop your illegal occupation and return the land to it's people, it's rightful stewards, it's 'ohana.</p>	<p>Please see General Response.</p>
Samuel Peck		<p>I oppose the EIS Proposal put forth and demand the return of all considered sites to the people of Hawaii, along with the rest of all the stolen land that the Military occupies and destroys. Out with the genocidal, imperialist U.S and its Military. Hawaii will be free.</p>	<p>Please see General Response.</p>
Misty Peoram		<p>Good evening, everyone. Aloha mai kakou. My name is Misty, and I am a member of Anakbayan Hawaii, and we stand in solidarity with the people of Hawaii to end the military leases and return Hawaiian lands to Hawaiian hands. For context, I spent my early years here on Oahu until I moved back to my homeland in the Philippines. It is with this perspective that I have seen just how the United States and its military holds control over all aspects of life, whether it be through the economy, through politics, or even through the media. I have seen the imprint that the U.S. Military leaves and how decades upon decades of work is not enough to clean up the mess that they make. More so, I have seen how their presence is in direct opposition to the sovereignty of the people. The thousands of pages of the draft EIS could not even begin to encompass the extent of damage that the U.S. military has done and will do should these leases be renewed. Even as their impact is ongoing, we know that the U.S. military has, and it will never be, true stewards of the</p>	<p>Please see General Response.</p>

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		<p>land like they like to claim. You, in fact, are the biggest polluters on this planet. The most important thing I have seen, though, in my past few years is that how the people have stood up and fought back against the U.S. military and their occupation in Hawaii. All of the people here today is only a small part of the larger movement that is fighting against these military leases. In 1991, in the Philippines, the people successfully kicked out and banned U.S. bases during the lease renewals, and they are still fighting until today. And I am sure that soon enough we will see the day where the U.S. military is not just out of these 6,322 acres, but out of Hawaii entirely.</p>	
<p>John-Reimarc Y. Peralta</p>		<p>I beleive when the military's lease is up, and they leave, our aina will flourish due to no testing's, no-one holding our water supply and controlling our Islands. The military has done several issues as to what cost us as local people from the islands. Although, I'm not native hawaiian I believe in the sole cost of being fair. The military &amp; government stole our land, stole our water, destroyed our ecosystem's, destroy many sacred he'au. That is native, NATIVE. And what is better; technology that "I fail and end man-kind as we know it or perserve what is left as a teaching stone to future keiki's. I beleive that the only right thing to do is to let what is of our hawaiian's, kanaka's, kupunas, &amp; kama'aina help revive and flourish our native lands from more green on our island to more corals on our reefs where fishes begin to thrive and our AINA becomes more healthier. And for the military fighting against us native people grown on the Islands like Oahu, go somewhere else and stop desicrating our land (even) more. THANKS</p>	<p>Please see General Response.</p>
<p>Andre Perez</p>		<p>Aloha kakou. Aloha. My name is Andre Perez. I live in Waiawa, Pearl City, on the shores of Pu'uloa. Not Pearl Harbor. Pu'uloa. I live with my family directly across a military superfund site, one of the most toxic sites in the US. And we live literally 200 feet across from the beginnings of that superfund site. I'm coming from a baseline of demilitarization. Now we have an excellent opportunity to demilitarize Hawaii. We must reduce the military footprint and impact to our land, water, and people, if our children are going to</p>	<p>Section 3.8.5.1 discusses existing mitigation measures, which include monthly training advisories are published to alert the public and neighbors of upcoming training activities that are louder in nature and may be heard outside the military installation. In addition to these notifications, USAG-HI has established internal policies and standard operating procedures in an</p>

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		<p>have a future. Red Hill has taught us that. The PFAS chemicals that were discovered in our water systems has taught us that. But I also know that the reality is that the US military is not going to pick up and leave Hawaii anytime soon. We're dealing with power. And the truth means nothing to -- to that kind of power. So I'm coming from a position of attainable, achievable demilitarization, which means reducing the military footprint and impact to Hawaii, our land, water, and people. To be clear, my politics, my personal politics, and my family, we are for total de-occupation, restoration of the Hawaiian Kingdom, independence, and sovereignty. But I'm going to speak to this process, this -- this -- this occupied process. The military have been horrible stewards of our land, horrible neighbors, as we've all heard. The -- the military has historically raped our land, water, and women. Land -- the land issues revolve around contamination, toxicity, superfund sites. In 2022, the Army started one of the largest fires in Pohakuloa. Most people don't even know about that. 2022, late July, RIMPAC started a fire at Pohakuloa that burned approximately 30,000 acres, including 3500 acres of sensitive, critical habitat. That is military stewardship of our land. That's what it looks like. This is nothing new to us. Water. We all know the Red Hill story. That has been an issue, with outcry, for decades. And only when the fuel came out in the faucets of military housing was there action taken. So we have this banner here up on the wall. This is my organization. The US military cannot be trusted with our land and water. You have demonstrated that time and time again. I'm a vet. I served active duty for eight years. I got out in 1996. I was stationed in Florida, Korea, and here, at Wheeler Airfield. So I'm speaking from experience in the military, and how the military operates as one of the worst contaminators in the world. People, our people here in Hawaii, we're tired of your -- your war noise. We're tired of gunfire training, whether live or simulated. We're tired of bombs and explosions in our community. We're tired of low-flying helicopters over our community. And I want to share some of that with you. If you give me a moment, and I'll wrap up. Kehau? Let me share some of that with you. To the</p>	<p>effort to minimize training noise and its impact on the community.</p> <p>To alert USAG-HI of a specific noise complaint, please call the Community Concern Line at (808) 787-1528 or send an email to <a href="mailto:usag.hawaii.comrel@army.mil">usag.hawaii.comrel@army.mil</a>.</p> <p>Additionally, Superfund sites are discussed in Section 3.6.</p> <p>A general discussion of wildfires on the State-owned lands is included in Section 3.14.</p> <p>Impacts as a result of climate change are addressed in Section 3.7. Text has been added to Section 3.14 regarding increased wildfire risk as a result of climate change. Section 3.14 was updated with a list of historical fires at the sites, and additional information on wildfire potential and wildfire fighting capabilities.</p>

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		<p>people, to the community, to the Hawaii community in this room, how many of you can hear this noise from -- that I'm about to play; put your hands down -- this noise that I'm about to play, from your homes, from the -- from the -- from the -- from the sanctity of your own home? Yeah. I want to play this. One moment. Here we go. Yeah. This is antiquated military traditions that mean nothing to us. Means nothing to us. It's noise. It's war noise. How many of you can hear this from your homes? Raise your hand. Raise your hand right now. This is antiquated military traditions that have no meaning to our community. But we're forced. We're subjected to hearing this war noise every single day from the privacy of our homes. I want to ask, how many people can -- I'm going to play one more. Imagine you got to hear that. I'm going to play it one more time. If we got to hear it, you got to hear it. We don't want to hear that no more. We're over it. And you know what? This is something that you guys can fix. How many in the room can hear this from the privacy of your homes? Every day, I have dozens and dozens of video of low-flying military helicopters over my home where I live, every single day. Every single day. How many of you can hear this from the privacy of your homes? This is what I hear from my home, where I live. This is what many people hear. We're tired of your war noise in our community. We're tired of the impact of US militarization, militarism, and occupation of our home. We're tired of it. We live next to this. Waimanalo. Ever been at Waimanalo at night? Bellows. Marine training, amphibious training. This is what it sounds like in the second most dense population Hawaiian population in the world. We have to hear your war noise, and we're tired of it. We're calling for the Board of Land and Natural Resources to reduce the military footprint, reduce the noise, reduce the impact to our community. And we're going to organize, and we're going to fight. This is just the beginning. You will see us on the streets. You will see us occupying military -- the entrance to military bases. We are going to organize, and we are going to resist your occupation, your poor stewardship, your contamination of our land, water, and people. You will see us for the next four or five years. You will see us</p>	

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Andre Laikoukeouli Perez		<p>because we're going to resist. We want a demilitarized Hawaii, and we want it now. Mahalo.</p> <p>Aloha mai kakou. My name is Andre Laikoukeouli Perez. I'm born and raised on Oahu. I live in Waiawa Makai, like my father, Andre Sr.; and my stepmother, Camille. I'm a father, community organizer and activist, a protector of the land and sea, like many of the people you see here today. I am here this evening in strong opposition of the proposal for military lease renewals for Kahuku Training Area, Kawaiiloa, Poamoho Training Area, and Makua Valley. How can you, the US military, propose another 65-year lease, when you have left a trail of destruction and desecration across our island chain? How can we trust the American military, an entity that is the one -- was one of the most prolific occupiers and polluters of indigenous land globally? Like many of us here, I have children, and a few of my main concerns are what are you going to leave for them? [...] Ultimately, the decision on the matter falls with the BLNR. And so I urge the Board of Land and Natural Resources to listen to the people, and uphold your duty as trustees of Hawaiian land, to not allow the renewal of the leases for the US Army. We, the Hawaiian people, Kanaka Maoli, Kanaka 'Oiwi, are the ancestral stewards of this land. You can try to bargain with us back and forth, but ultimately what we want is our land back. And so I say "aole" to your new lease proposal. We do not consent. And one last thing. Free Palestine. Free Gaza. Free the Kingdom of Hawaii. Free all oppressed occupied subjects of America, its allies, and its military industrial complex. Mahalo nui loa.</p>	<p>Please see General Response.</p>
Andre Laikoukeouli Perez		<p>In what condition will our land be returned to us? What lasting impacts will your use of these Hawaiian lands have on the cultural spaces and practices of the generations to come? We don't trust the American military, and the reasons why are in the evidence that exists all around us in places like Makua Valley, Hokuoloa, Kaho'olawe, Pu'uloa. These are prime examples of the level of care that is given to our land, sacred land, which have been so heavily impacted by military operations. What are we, as kanaka, people of this land, to think? These impacted sites, that have yet to be</p>	<p>Sections 1.3.3 and 2.3.1 explain the Army's need and screening criteria for long-term use (i.e., at least 25 years) of the retained lands.</p> <p>Section 3.2.5 has been updated with information on State inspections of State-owned lands, including those within MMR.</p> <p>Section 3.6.2 and Appendix J have been revised to</p>

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		<p>cleaned up or restored to the original state as promised, are scars, reminders, if you will, of why we do not and cannot trust the American military with the responsible use of our land. <u>The US Army has yet to be in compliance with its previous lease conditions from its inception.</u> Why would we believe that they would be in compliance moving forward? The military's destruction of our land and our cultural sites, the military's poisoning of our sacred fresh water, the military's pollution of our ocean and bays needs to stop immediately.</p>	<p>add a description of the Military Munitions Rule, the rule's applicability to MEC cleanup actions on the State-owned land, and the definition of operational ranges.</p>
Bryant Perez		<p>I am strongly against the renewal of all military leases over our Āina. So long as the imperialist monster lays claim to our Āina, our kanaka will continue to suffer the same destruction, exploitation, and displacement that has wreaked havoc across Hawai'i and the whole of Oceania. Peel back the layers of colonialism and begin a new path to reclamation and sovereignty for our Kanaka. Keep Hawaiian Lands in Hawaiian Hands. Āina Back!!</p>	<p>Please see General Response.</p>
KRISTEN PERREIRA		<p>THE MILITARY POSES AN ENVIRONMENTAL HAZARD AS EXEMPLEFIED THROUGH RED HILL. IF ANYTHING THEY SHOULD BE PAYING MILLIONS IN FINES AND FEES RATHER THAN RENEWING A LEASE FOR \$1. ANYONE WHO POISONS PEOPLE SHOULD BE IN JAIL.</p>	<p>Please see General Response.</p>
Johnnie-Mae Perry		<p>I'm not 123. I'm Johnnie-Mae Perry. I speak in behalf of my late cousin, Watabea Alteger. She was very much involved with Makua back in the '70s and she did the Makahiki every year, and she was very close to Leandra Wei. . . . . She, my cousin, Watabea, passed last year. This month she would have been 72. So I -- I -- I think I would answer that she probably would say no action, dismiss from Hawaii.</p>	<p>Please see General Response.</p>
Nani Peterson		<p>Aloha mai kakou. O'wau Nani. I am from Waianae. Aloha again. You see me again. Because even though I am from Waianae, I protect Kahuku. I protect all of the areas of Hawaii through and through. We are all connected, no matter what, yeah. So we can stand for each and every one of us. Mahalo, Kahuku, for allowing us from Waianae and every place else to be here. I waited until the end to give the opportunity to our Kahuku ohana to speak for us. I'm not going to go over again what I shared -- told you. Well,</p>	<p>Please see General Response.</p>

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		<p>actually, no, I'm going to go over it again, just a little bit. All right. Again, you've heard from many of us that you are talking to the wrong people. The State of Hawaii does not own any land in Hawaii at all. First thing -- and I speak to the people in the camera over there -- you like deal with anything with us. Follow the international laws of occupation. First and foremost, the Hawaiian Kingdom laws that exist till today. That's the first thing that you must do to show good faith to us for all of this desecration, destruction, death - - I'm going to go over that again, yeah -- that you've done to our people, to our aina that we love so much. Mr. Steve, I'm glad you heard us a little bit. You've brought your friend here, but there -- she's on the same level as you. We asked you to bring somebody higher than you. So I'm going to ask you again that you can hear us again. We don't want to speak to you. Sorry. We want to speak to the higher-ups, because you don't make the decisions, they do. So bring them tomorrow, please. Everybody has brought so much hurt, so much pain, so much eha. Some solutions, yeah, we say no. No, no, no. I told you guys that last night. You, you in the camera need to just fund us, need to pay for all the things that you've destroyed, need to pay for us to be able to live in this time of detriment that you have caused. Yeah. That's all you have to do. That's your one -- that's two kulueanas that you have: follow the international laws of occupation, fund our people of Hawaii to clean up your mess. Because you are not from here, we are. We have connections to this aina. Our kupuna is buried all over this aina that you destruct. And you don't give a shit about that. We do. We do. It hurts. So just pay us. Pay us for the wrong that you have done. Again, train our people that are Kanaka of and from this place to operate -- to understand and how to operate all of your equipment, because none of that is going with you when that time comes for or this huluhia. Because it's going to happen, and they need to know how to run that. It's not yours. It won't be yours. It'll be ours, and they need to understand how to do that. You can fund all of our kanaka that are learning how to -- in the robotics field. You can fund them to go and train, get training on how to</p>	



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		<p>understand robotics, how to make robots, so that we can send our robots out to all these areas that you've destroyed that have ordnance still to remove them. Fund that. I don't see you writing them down. Can you please write it down? Mr. Steve, I'm asking you to please write it down. Fund that. Fund that. Fund that. There was another funding, but I forgot. My brain is shot right now, because this is way too long. So I will be back tomorrow and tell you more of what I need to say. The rest of the moment, I just want to say real quick, kakou, because I don't think they heard us. Yeah, you can see, again, they only have this level of authority here. We want them up there. But they're not hearing us in what we're saying as far as no. I'm an educator. I'm a kumu Olelo Hawaii. I teach Hawaiian language. Before I say what I want to say to everybody else, kala mai, Tita. The destruction that you've caused hurts me and hurts the keiki that are here, as well. I teach Olelo Hawaii. Olelo Hawaii brings life. I need to be able to tell my stories, tell my kupuna stories of these places that you are destroying. If you keep destroying that, how is my kids going to see what my kupuna saw? How? That's not right. That's not fair for them at all. Come, I invite you to Ka'ala Farms. Come join me and our hui to get in the aina so you can understand why we love this place so much, how much it means to us. Hopefully, something ignites in your na'au to change your mind and come on our side. Yeah. Because you're on the wrong side. Kakou, again, they never hear. Yeah. And so me being an Olelo Hawaii teacher, I cannot be that unless I teach Hawaiian. So we all know the olelo -- the hua olelo for no, yeah? What's that, kakou? [THE AUDIENCE: A'ole.] Olelo ho'o. [THE AUDIENCE: A'ole.] Olelaho. [THE AUDIENCE: A'ole.] Do we want this to continue? [THE AUDIENCE: A'ole.] Do we want them to retain these lands? [THE CROWD: A'ole.] Do we want the military to still be here? [THE CROWD: A'ole.] Oh, some of us would hesitate on that one. A'ole. I hope you heard that, sir and ma'am. We said no all night long, yesterday, and we're gonna say them again tomorrow, no. Please come with Q-tips. In fact, know what, I'm gonna bring Q-tips for you tomorrow so you can hear us a</p>	

Commenter	Submitted By	Comment	Response
		<p>little bit better, all right? And then tomorrow, one more thing, come with a little bit of smile. I know this is hard, but, oh, my gosh you guys look like angry military people. Mahalo kakou.</p>	
<p>Nani Peterson</p>		<p>Aloha. Mr. --how do you say your name? Sorry, I don't want to -- Okay, Mr. Steve. . . . . All right. My name is Nani. I am a kupu of this aina, of this moku of Hawaii, and I specifically, I'm a kia'i. I will live -- I live here and I will die here. All right? . . . . . The state of Hawaii does not own anything in our islands; therefore, you are asking the wrong people. They don't own, especially, our lands. We don't even own our lands. Mr. Steve, we, including you, and all you work for, are supposed to be stewards to these lands. . . . . This EIS document, all documents written by the United States of America that is present here, produced, issued, and signed, are null and void and do not apply to the Kingdom of Hawaii that continues to exist under international, international and national laws, under signed treaties, the supreme law of the lands in which your United States of America government has agreed to. . . . . Your document, as I read, and I only got up to maybe 100 at the most, it was ridiculous. The words were very misleading, yeah, and it always ended up leading back to the military not doing anything but what is fit for the military. And nothing for the aina, nothing for the people of this aina. So I would say, again, null and void. All right? . . . . . Your illegal 65-year lease from 1964 should end now. Your mission requirements and planning you must do, plan to fund the kingdom of Hawaii forever For all the wrongs the military has done to our spaces, our places, our people. For we, of and from Hawaii, will have to clean up your mess, forever, because your track record shows you won't. . . . . Plan to train our kanaka, of and from Hawaii, that is serving you at this moment, to know how to operate all your military equipment for when you migrate back to where you came from. . . . . Over the past six decades, these 51,000 acres of stolen army training areas and lands has only brought upon displacement, disconnection, destruction, desecration, drugs. Yes, you are a part of drugs, this drug epidemic issue here, and death, and more in between. . . . . Your answers to your proposal to</p>	<p>Please see General Response.</p>

Commenter	Submitted By	Comment	Response
		<p>retain any lands across Hawaii is no. No. No. Kakou. I want -- I want to read this to you real quick because I kind of wanted to see, really, what the Army's mission is, yeah? And so just let this resonate with you right now, yeah? See how much aloha the military really has, yeah? . . . . "Our purpose remains constant. This we'll defend has been our Army's model since the Revolutionary War. It reminds us" -- sorry, hold on. I'm -- this is my last thing. "It reminds us that our purpose is timeless and clear, to fight and win our nation's wars." Their nation, not ours. "When our Army hits the dirt, America means business. Our teammates don't want to fight without us, and our enemies are wise to fear us." I doubt that. We're not fearful of you. . . . . "We are not a Pacific Army or a Europe Army." They're not even for us, kakou. . . . . "We are not a brigade-centric or division-centric. We are a global force that fights when called upon at the scale required. To do that, we must stay grounded and dedicate our energy in four focus areas: War fighting, delivering ready combat formation, continuous transformation, and strengthening the profession." . . . . Does that sound like aloha to you? Does that sound like they care about our aina to you? Does that sound like they care about us to you? . . . . You are on notice, sir. I am a descendant of these ainas and a kia'i of these ainas, and unless you get the consent from us, the people of this place, you are not moving forward with any aina.</p>	
Dylan Pilger		<p>I am writing to voice my strong opposition to the renewing of the Army leases at Mākua, Poamoho, and Kahuku and to recommend that decision-makers pursue the no action alternative and allow the leases to expire. The Army has destroyed sacred sites, agricultural lands, and is threatening our vitally important natural resources. They have done a great injustice by evicting Hawaiian families and preventing access to these lands. Once again, I firmly believe that the only appropriate course of action is to pursue the no action alternative and allow these leases to expire. Mahalo for your attention to this matter.</p>	Please see General Response.
Craig Pilgram		<p>As an Army veteran, I oppose this move for the Army to remain on Hawaiian land. The military is not a steward of the environment,</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>they are a disaster. The Red Hill Fuel Storage incident should be immediately disqualifying, but that's just the tip of the iceberg when it comes to the negative impact the military has on the land they use and the communities they disrupt by forcefully maintaining a presence despite the objections of local residents. The United States does not need to be an imperialist country, and native Hawaiians deserve to be the stewards of their ancestral home. Give Hawai'i back to her people.</p>	
Sherry Pollack		<p>To whom this may concern, Please consider the following comments regarding my concerns after reviewing the Army’s Draft Environmental Impact Statement (DEIS). Below are some of the concerns I have with regards to the report’s analysis, or lack thereof, addressing climate-related impacts. The tragedy in Lahaina is a reminder that climate change has already contributed to Hawaii’s increased susceptibility to wildfires. Yet the DEIS downplays the added risk for wildfires that the Army’s activities would create. It is important to point out that HECO has identified specific areas on each island that have high wildfire risk, so much so, that these areas may now be subject to a public safety power shutoff (PSPS) because of this heightened risk. If you look on their map (1), nearly the entire Waianae coast area all the way to Schofield Barracks is designated as PSPS. Military training near these areas, and the high potential for fire ignition as a result, consequently presents a clear and present danger to people living in Western and Central Oahu.</p>	<p>A general discussion of wildfires on the State-owned land is included in Section 3.14. Section 3.14 also discusses training restrictions according to wildfire hazard conditions.</p> <p>Impacts as a result of climate change are addressed in Section 3.7. Additional text has been added to Section 3.14 regarding increased wildfire risk as a result of climate change. Section 3.14 was updated with a list of historical fires that have occurred on the State-owned land at KTA, Poamoho, and MMR. Additional information on wildfire potential and wildfire fighting capabilities was added to Section 3.14.</p>
Sherry Pollack		<p>Additionally, I am concerned by the inadequate greenhouse gas emissions analysis in this DEIS. To be clear, the purpose of the Hawai’i Environmental Policy Act ( HEPA), is to establish a system of environmental review which will ensure that environmental concerns are given appropriate consideration in decision making. According to HAR §11-200.1-13(b)(13), in determining whether an action may have a significant effect on the environment, the agency shall consider every phase of a proposed action , the expected impacts, and the proposed mitigation measures. An action shall be determined to have a significant effect</p>	<p>As described in Section 3.7.5 of the EIS, the existing conditions and environmental consequences of KTA, Poamoho, and MMR related to air quality are analyzed. Because the Proposed Action is a real estate transaction, meaning all tract areas and retention options would not result in changes in air quality and GHG emissions, text was clarified in Section 3.7.4 and added to Section 4.2 of the Final EIS that a life-cycle analysis has not been conducted and is not</p>

Commenter	Submitted By	Comment	Response
		<p>on the environment if it may require substantial energy consumption or emit substantial greenhouse gases. Yet this requirement was completely ignored throughout the DEIS. Nowhere in this document was the actual data on greenhouse gas emissions provided. In fact, there was a complete failure by the Army to conduct an actual assessment (beyond generalized assumptions) to evaluate the environmental impacts, including greenhouse gas emissions and their contribution to climate change. This assessment is a requirement, “ the agency shall consider every phase of a proposed action,” in other words, a lifecycle greenhouse gas emissions assessment, and simply cannot fail to be conducted. For the Army to assert “a full life-cycle analysis of GHG emissions from non-scope considerations such as manufacturing and shipping of equipment and materiel, and troop movements to and from KTA, Poamoho, and MMR is beyond the scope of the EIS.” (DEIS V.3 Part 2 at E-30) is both unjustified and unacceptable. The DEIS identified a less than significant impact for all proposed alternatives. (Table ES-3). However, nothing in the record supports that assumption. No actual emissions data was provided to substantiate this claim. Moreover, conclusions such as “The continued production of the same levels of GHGs would not meaningfully contribute to the potential impacts of global climate change” (DEIS at 3-165) illustrates that the Army chooses, without any meaningful GHG analysis, to simply ignore any impacts of GHG emissions their military operations are responsible for. Essentially, the Army used an inadequate method and baseless assumptions to estimate the GHG emissions and assert that there would be little or no impact on global greenhouse gas emissions. Every ton matters. We need to ensure a HEPA process that fully informs the public of the consequences of the different options. The DEIS falls woefully short. In summary, I found this document and the analysis on “climate change considerations” to be a disingenuous attempt to fulfill established requirements for an environmental analysis, and instead provided an exercise in ‘box checking’ rather than what is truly needed to determine whether potential critical environmental</p>	<p>considered necessary for the EIS analysis, and a qualitative analysis is sufficient.</p>

Commenter	Submitted By	Comment	Response
		<p>impacts exist. Bottom line, the Army has failed to meet their statutory requirement when conducting this DEIS. Thank you for the opportunity to provide comments. Sherry Pollack 1. <a href="https://www.hawaiianelectric.com/safety-and-outages/wildfire-safety/public-safety-power-shutoff/pmps-maps">https://www.hawaiianelectric.com/safety-and-outages/wildfire-safety/public-safety-power-shutoff/pmps-maps</a></p>	
Kealii Pooloa		<p>To whom it may concern,                      It is absolutely deplorable that the US Army feels they can extend their illegal "leases" to our aina on Oahu, after all the desecration they have already committed and stated they would continue to desecrate if granted continued access.                      It is with a resounding HELL NO, that as a kanaka maoli no i ka Oahualua, a native Hawaiian woman who was born and raised on Oahu, I would ever support continued leases that will leave us with more desecration, more untold damage to our land that will have continued adverse effects for generations to come.                      The US Department of Defense has a very very bad, as in terrible, disgusting habit of destroying the land and refusing to clean it up afterwards. Why, just look at what the Navy has done to Kahoolawe and to Red Hill. They have destroyed the water, the very thing we need to sustain life on this planet, but this deplorable US Department of Defense, that majority of my taxes are forced to fund, could care less. They claim all this destruction is necessary for our "Freedom", what a joke. We are not free, not if we cannot stop such disgusting destruction of our most precious resources, so we can be safe in our homes, free to drink the water and it be pure and unsullied, so we can sleep safe in our homes that are not taken by the military personnel, where we won't be forced to hear bombs going off. There is no freedom without justice, and where is the justice for Makua? For Poamoho? For Kahuku?                      STOP THE MILITARIZATION OF OUR AINA, OF OUR HOME, OUR WATER AND OF OUR WAY OF LIFE. STOP THE LIES THAT SUCH DESECRATION IS NECESSARY FOR OUR "FREEDOM".                      Signed,                      forever a warrior fighting for Hawai'i</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
Ethan Porter		<p>I strongly oppose the continued leasing of land to the United States Army, specifically at Makua Valley.</p> <p>It is not appropriate to continue to use this land as a testing ground for live fire weaponry when our lives are far more endangered by lack of sustainable agriculture and climate change.</p>	Please see General Response.
Talia Portner		Please do not renew these leases. These lands need to be cared for and used by Kanaka Ma'oli and kama'aina. We do not need more military on islands, we need thoughtful Land use and care on these sites.	Please see General Response.
Gina Priego		No lease on stolen land keep the aina in Hawai'i hands	Please see General Response.
Melissa Primacio		<p>Aloha. My name is Melissa Primacio, the queen's granddaughter, as Auntie says over here. My grandfather, Junior, yes, served at Vietnam, and military has been in our family for generations. I am the oldest of 10 children, and I have five siblings who serve for the military. And I'm a very big supporter of the military. We've also been a nine generation family that has lived in Kahuku. So I've lived here practically all of my life. I am on the fence. Do not get mad at me. But I'm on the fence, because Kahuku has gone through so many changes that we didn't want, nor did we like, but it was shoved down our throats. And the reason why I'm on the fence is because Kahuku has been my home. My son is laid to rest in the training area. I visit him once a month, and it is beautiful up there. And so I don't know how much desecration has gone, but it's a very beautiful ride up there, and it's a very lonely ride home because I leave my son. But I can visit my son because it's not developed. People with big money have not bought that land because you guys use it. That's what I'm worried about, is that we are fighting the wrong people. This testimony to you should be to our governor, not to you folks. We're fighting the wrong people. And because the governor -- like Uncle said, this is a forced meeting. You guys have to have so many meetings with the community before a deal can be signed, because I was chair for our Kahuku Community Association. We had to have so many meetings to meet project levels for approval. So I'm on the fence because I don't want development or private owners to come and buy it out</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>or take it on, and then I will never be able to go visit my son. But at the same time, you guys pay a dollar, or you guys leave trash, or you guys just don't work with us with what we want. So if you guys do -- and there's two other individuals who brought up -- if you guys do renew your retention or your lease, can you guys continue to use only rubber bullets in Kahuku training? Because we don't live with live ammunition going around. I can't say for the other communities that have their training centers, but in Kahuku, we don't deal with live rounds. And that gives me some peace for my grandchildren and the future generations to come. But I don't want to be here blind, and then you guys don't get your lease, and then we have a landfill in Kahuku. How many times is Kahuku going to have to tell the government that we shouldn't have things that are unsafe for our community in our community? How many more fights, whether you get your lease or not, are we going to have, meetings here in Kahuku High School about our safety and our wellbeing in our own community? That's where I'm at. And that's why I am on the fence, because I don't know if this is good or bad, because I don't know what the government has cooked up after this. Mahalo.</p>	
Kyrie Puaoi		I strongly oppose the continued leasing of land by the military.	Please see General Response.
Greg Puppione		<p>I support Alternative 3 with an addendum that the US Military is responsible for <u>clearing all unexploded ordnance and toxic waste (within 5 years of lease termination)</u> that have been dumped in these locations over the last 80 years or so.</p>	<p>Section 3.6.2 and Appendix J have been revised to add a description of the Military Munitions Rule, the rule's applicability to MEC cleanup actions on the State-owned land, and the definition of operational ranges. Current management measures to mitigate potential impacts from hazardous substances and hazardous wastes are discussed in Section 3.6.5.</p> <p>Lease compliance actions and cleanup and restoration activities which would occur upon lease expiration are discussed in Section 4.2.4. Cleanup of Federal lands is outside the scope of this EIS.</p>



Commenter	Submitted By	Comment	Response
Greg Puppione		<p>If the lease renewals are going to be forced upon the people of Hawaii, I would expect the <u>lease terms to be significantly shorter than the last ones and the 'rent' paid by the military to be millions and millions of dollars more</u> than what was paid before.</p>	<p>Section 1.3.3 and 2.3.1 explain the Army's need and screening criteria for long-term use (i.e., at least 25 years) of the retained lands.</p> <p>In the instance where a lease is the land retention estate for the State-owned land on O‘ahu, the Army has stated that it would, in coordination with the State, provide a 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 Sections 2.3.2, 3.1.3, 3.2 and Appendix G to add the assumption that a new lease or a fee simple arrangement 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>
Shylyn Kawailhia Purdy Purdy		<p>Aloha my name is Shylyn (Kawailahia) Purdy. I am from Ho‘olehua, Moloka‘i.</p> <p>I’m am 1,000% against the Army's proposal on continuing to lease state lands for training. I do not support military use on any lands. Every piece of land is precious and has so much value to us Hawaiians. We don't need anymore U.S. Government-controlled training lands. Even though the Army has stated that they are no longer pursuing the continuation of live-fire training activities at MMR. That's just 1 place mentioned out of 4. I do not trust a word the Army says nor the government. WHY SHOULD WE SUPPORT THE ARMY WHEN THE NATIVE PEOPLES ARE NOT SUPPORTED BY THEM? I DO NOT SUPPORT MILITARY COMBAT TRAINING OR ANY TYPE TRAINING it is all a bunch of B.S., hidden agendas and violent acts. WE DO NOT NEED THAT ANYMORE. WHAT WE ALL NEED TO LEARN AND FOCUS ON IS RESTORING ALL OF HAWAII FROM MOUNTAIN TO SEA (AHUPUA‘A). We NEED TO PAY ATTENTION AND NOT FORGET ABOUT THE PEOPLES, OUR WATER, PLANTS,AND</p>	<p>Please see General Response.</p>

Commenter	Submitted By	Comment	Response
		<p>ANIMALS WHO ARE FROM THE LAND. IF WE HAD MORE SUPPORT I believe Hawaii would thrive and flourish.</p> <p>We've been stripped away from so many things for way too long it's time NATIVE LANDS are managed by the NATIVE PEOPLES, organizations, groups, programs, businesses. The KANAKA of Hawai'i is the people who connect. We can feel the hurt and needs of the 'āina and We are the ones who Could make things right. Now is the time. I say No More training In all of Hawai'i. No more military occupation of Hawaii. It's time to clean up all your mess and unexploded/exploded ordinances on all islands including all the islets off shore. I work in the conservation field and witnessed with my own eyes all the rubbish left behind , abandoned infrastructures and all. The only training that should be next is cleaning Hawaiian lands, restoring, and how to Aloha (LOVE)!!! Shame on you U.S. Military! You have no ties, connection or love to OUR lands. What makes you think We should trust that You'll do the right thing or believe that you care?</p> <p>I have so much to say but I'll end it here:                      A'ole! A'ole! A'ole! No! No! No!</p>	
Missy Quarry		<p>As a supporter of the indigenous peoples of Hawai'i, the military should no longer have a training place on their islands. The military and American government took advantage of a group of people, to this day making them second class citizens on their own land. Please do not renew this lease, that was a single dollar when created, but if there is a decision to move forward there <u>should be significant increase in the cost for leasing the land of nā poe Hawai'i.</u></p>	<p>In the instance where a lease is the land retention estate for the State-owned land at O’ahu, the Army has stated that they would, in coordination with the State, provide a fair-market value for the leased State-owned lands. Determination of fair market value is outside the scope of this EIS. Sections 2.4, 3.1.3, and 3.2, and Appendix G of the Final EIS have been revised to clarify the assumption that a new lease or arrangement for fee simple Federal ownership would be negotiated at no less than an equitable, fair market value with the State. Land retention negotiations, including compensation for use of the State-owned lands, would be initiated following completion of the NEPA/HEPA process.</p>

Commenter	Submitted By	Comment	Response
			<p>The Proposed Action is for the amount of land the Army seeks to retain, and does not make the decision for land retention duration or method, whether it be for a new long-term lease, fee simple title, or land exchange, because that negotiation process would occur with the State following completion of the EIS. Details including timing for the rule amendment and land valuation is outside the scope of this EIS.</p>
John R		<p>the US military has been poisoning the people and the land of Hawaii for decades and not only have they not attempted to clean up after themselves, they lie and cover up their many crimes. The US military needs to stop occupying stolen land and displacing locals and poisoning people.</p>	<p>Please see General Response.</p>
Jordan Ragasa		<p>I am deeply concerned about the continuation of Army leases on Mākua, Poamoho, and Kahuku, given the profound cultural and ecological significance of these lands to the Kanaka Maoli people. The US Army has not been good caretakers of the leased Hawaiian lands, natural resources, and endangered species that reside at these sites. The ongoing occupation has caused significant environmental damage, including the degradation of precious natural resources and the endangerment of native species such as the ‘apapane and ‘i‘iwi birds.</p> <p>If the Army were to attain a new lease on what is now conservation land, it would require the suspension or amendment of conservation laws to allow continued military training. For decades, our communities have suffered, sometimes being forcibly removed to make way for this training. These training areas are adjacent to residential communities, where young children are growing up in war-zone-like environments. This is not acceptable.</p> <p>Without a solid, detailed plan to ensure the safety of our ecosystem and the health of our communities, I stand in firm opposition to the renewal of these leases. We all deserve safe homes, clean water, thriving ecosystems, and fresh air, and the continuation of these</p>	<p>Please see General Response.</p>

Commenter	Submitted By	Comment	Response
		<p>leases threatens these fundamental rights.            Mahalo for your consideration!</p>	
Elizabeth J. Rago		<p>It's fine. Aloha. My name is Elizabeth Rago Kaili, and I'm a resident of Kahuku. My connection to this aina is deeper than residency, though. As a Tonga to Whanau to Aotearoa, I am taina, or younger sibling to Kanaka. And as a younger sibling, it's my kuleana and responsibility and my blessing to protect this aina. I've worked with members of the military with PTSD, and many understand their role in desecration and poisoning of the aina, of sky, of mammal, of marine life. Participation in the culture of war can cause a compromise of self- respect and chips away at the very soul -- at their very soul, just as a military industrial complex attempts to chip away at the very soul of the lands and people of Hawaii. The military causes trauma in their own troops, even as they attempt to perpetuate generational trauma of the people of Hawaii. For the same reasons articulated by people more smart and wise than I, a'ole to the extension of military leases. It's time for the military to use the next four years to clean up the land and return it to the Kanaka Maoli. Thank you.</p>	Please see General Response.
Dylan Ramos		<p>I offer the following comments as a lifelong resident of O’ahu: These lands have been through enough. The people of these lands have been through enough. Whether seen as hyper-militarization of the 50th state, or continued military occupation of an illegally overthrown and annexed nation, Army Training Land Retention, especially in these areas of Hawai’i, reeks of modern colonialism, environmental and social injustice, and simply contributes to Hawai’i's status as an imperial outpost (read "target"). Hawaiians have been clear: ATLR, particularly related to Makua Valley, does not have their consent, and it does not have the consent of the majority of the people of Hawai’i.</p>	Please see General Response.
James Raymond		<p>The United States Army , Have we learned anything from our military misadventures in lands in which we have no legitimate right to be? The Army is operating on stolen land in Hawai'i and without legitimate authority -- this context has always led us to failure. It's</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		time to do the right thing and leave or stay if the Hawaiian people (kanaka) permit it. James Raymond Kailua James Raymond	
Kalea Raymond		Please no more bombing and shooting. Hasn't the military done enough to the land of Hawai'i.	Please see General Response.
Lisa Schattenburg Raymond		I oppose the use of Hawaiian land for military purposes.	Please see General Response.
Skye Razon-Olds	Kānaka Climbers	<p>We, Kānaka Climbers, NHO founded to protect the land, strongly supports no action for Army leases at Kahuku, Poamoho, and Makua</p> <p>Our 501c3 works on educating the community about how to apply indigenous values to recreate outside in an ethical and with care for cultural resources. Our team partners with stakeholders in the community, such as government agencies, other non-profits, and local businesses to advocate for managed community access to land with developed management plans.</p> <p>Red Hill and Kaho'olawe are prime examples of the extreme damage done when the military is not held accountable. Based on the draft of the environmental impact statement (EIS) for the Army's leases at Kahuku, Poamoho, and Makua, we are not confident that the Army is able to or willing to honor and protect the immense cultural, biological, and historical value of these spaces. Conversely, organizations like ours, founded and led by Native Hawaiians are intimately involved in the land that we steward.</p> <p>Because of this we carry the knowledge of how to manage conservation efforts, educate individuals we could sustainably recreate in these areas, and maintain the necessary protections to cultural resources. In addition to being a culturally significant space, the Kahuku track is also an area that is vital to the recreational outdoor community where 7,000 members recreate. Our team is deeply embedded into this community and indebted to this space for its inherent value that it brings to all of us. We, the people of and from this land, understand how to properly steward and care for it.</p> <p>The current actions (or lack of appropriate stewardship) by the</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>United States Army, threatens the integrity of our precious Hawaiian lands and the well-being of our communities. Do not perpetuate this destructive precedent. The life and livelihood of our land and its people depend on this decision. So, again, we ask that the Army move forward with the No Action Alternative for its land leases at Kahuku, Poamoho, and Makua.</p> <p>Mahalo for your consideration,                      Skye Kolealani Razon-Olds                      Kānaka Climbers Executive Director</p>	
Skye Razon-Olds		<p>I, Skye Kolealani Razon-Olds, strongly supports no action for Army leases at Kahuku, Poamoho, and Makua</p> <p>I personally work on educating the community about how to apply indigenous values to recreate outside in an ethical and with care for cultural resources. I have partnered with stakeholders in the community, such as government agencies, other non-profits, and local businesses to advocate for managed community access to land with developed management plans.</p> <p>Red Hill and Kaho’olawe are prime examples of the extreme damage done when the military is not held accountable. Based on the draft of the environmental impact statement (EIS) for the Army’s leases at Kahuku, Poamoho, and Makua, I am not confident that the Army is able to or willing to honor and protect the immense cultural, biological, and historical value of these spaces. Because of this I carry the knowledge of how to manage conservation efforts, educate individuals on how to sustainably recreate in these areas, and maintain the necessary protections to cultural resources. In addition to being a culturally significant space, the Kahuku track is also an area that is vital to the recreational outdoor community where 7,000 members recreate. I am deeply embedded into this community and indebted to this space for its inherent value that it brings to all of us.</p> <p>The current actions (or lack of appropriate stewardship) by the United States Army, threatens the integrity of our precious Hawaiian lands and the well-being of our communities. Do not perpetuate this destructive precedent. The life and livelihood of our</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>land and its people depend on this decision. So, again, I ask that the Army move forward with the No Action Alternative for its land leases at Kahuku, Poamoho, and Makua.                      Mahalo for your consideration,                      Skye Kolealani Razon-Olds</p>	
Rory Reiley		<p>Hi I would like to submit a comment on the Draft EIS about the military and in a response to the following: Leasing the land I agree, to the lease of the land to the military if it is in the best interest of protecting our county and training our troops. Otherwise, I would say return the lands to the Hawaiian homelands. <u>The lease should clearly define the responsibility of the government to protect our land and our cultural heritage sites and the provision of access to the lands.</u> Under the 1969 lease it clearly states that the land should be open to the public for recreational activities. This access on the weekends has been accomplished by the Hawaii Motorsports Association since that time by offering OHV (Off Highway Vehicle) motorcycle dirt biking. This has been a major support of the community and the island of Oahu in regard to offering the community of 1,500 riders a place to ride and spend time with their families. By offering this management of the land on the weekends the Hawaii motorsports Association has accomplished 3 major goals: By presenting their core values of 1) Riding responsible 2) Taking care of the land 3) Improve the community These values allow the organization to educate the young riders about the importance of safety and not riding in unauthorized areas around the island and motorcycle safety. While teaching the riders about conservation and native Hawaiian plants and their importance to the land and protecting them. Improving the community is accomplished by offering an alternative to drugs and alcohol by offering a sport as a positive alternative. In addition, the support of the military through learn to ride programs have helped many veterans overcome their battle with PTSD. The Hawaii Motorsports association has standard operating procedures and plans regarding the fire prevention, conservation, erosion control, and native plants in the area In the lease it clearly states the importance of the public</p>	<p>Sections 1.1.1.1 and 2.2.2.1 of the EIS acknowledge the Hawaii Motorsports Association use of Tract A-1 and the State permit for such use. Section 2.3.2.1 stipulates provisions for motocross use in a future land estate in that all public access to the State-owned lands retained would be negotiated with the State or other appropriate stakeholders, for example, to participate in motocross events when the military training schedule allows. 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> <p>Future lease conditions text in the Executive Summary, Chapter 2, and Appendix G has been revised to note that future lease conditions:</p> <ul style="list-style-type: none"> <li>* Would be similar to the current lease.</li> <li>* May include references to Federal and State regulations in existence at the time of a new lease.</li> <li>* May be revised or added by the State in a new lease, but that the EIS cannot precisely analyze potential impacts because those lease conditions are unknown.</li> </ul> <p>Appendix M-2 lists all State comments received on the Draft EIS and Army responses.</p>

Commenter	Submitted By	Comment	Response
		<p>access to the lands, and we would hope to continue to accomplish this through a partnership with the Military and state by allowing the weekend end use of the land as a motocross park on the weekends and using the RTP (recreational trails Program) funds and other funds to accomplish this important management of the large volume of OHV motorcyclist on the island. As an alternative in the use of – I would like to see the Military and State create a recreational area with running water and restrooms and pavilions for meetings to take place. Managed by the Hawaii Motorsports association. Thank you R.S. Reiley</p>	
Juliana Rhee		<p>Aloha, My name is Juliana Rhee, and I oppose the renewal of the 1964 Military Leases set to expire in 2029, including the Kahuku and Kawaiiloa-Poamoho training areas, and the Makua military reservation. The forced relocation of communities that occurred in the creation of these training sites is not only unjust but cruel and unnecessary. In light of a long history of occupation, colonialism, cultural genocide, and violence, including the Red Hill Fuel Crisis, the US military must start to not only recognize the impacts of their actions, but also start to change them, otherwise their claims of environmental justice and care for the community in Hawai’i will remain empty and meaningless. From an ecological perspective, these lands are priceless, providing a home for dozens of endangered, endemic species who are already at risk adapting to climate change and environmental degradation that the military participates in and contributes to. The lands of Hawai’i are already at high risk of becoming a biodiversity hotspot, and to renew these leases with full knowledge that they will damage the land is to continue to set a dangerous precedent that unnecessary destruction of land and community is ok. More military training sites are not more important than people, land, and ecosystems. Kapu aloha. Ku Kia’i O’ahu. Do not renew these leases.</p>	Please see General Response.
Dandre Richard		<p>Dandre ko’u inoa. So I wanted to introduce myself in Olelo, as an acknowledgement of where we stand today. We are in the Kingdom of Hawaii, surrounded by natives, descendants, and allies that are fighting against the US and their military forces' unjust</p>	Please see General Response.



Commenter	Submitted By	Comment	Response
		<p>occupation of these islands. This process that we are going through right here is something that I -- I don't really have the words for, because it doesn't feel as if something that's thorough or genuine. Actions are how you show that you care. That's something that -- from the testimonies of everybody before me, that's something that is very well-documented. Y'all have never practiced malama here in Hawaii. And you may prey on the ignorance of those that don't know better, but those are just minds waiting to be taught. As is clear from everybody that does know, the choice is obviously "no." "No" to the military leases. "Aole" to the occupation of Hawaii. Y'all could get away, but you will not get away with it. The people, we are organizing, we are here, we are present. And when we stand together, y'all don't stand a chance against us. Thank you. Mahalo.</p>	
Dandre Richards		<p>What can be said that properly approximates just how the local community feels about the US military's occupation of Hawaiian land?          I don't have the words, only a request.          Answer the knocking you hear at your closed-door meetings.</p>	Please see General Response.
Ali Rigg		I OPPOSE!	Please see General Response.
Awapuhi Robinson		<p>I'm Awapuhi Chanel Kala'uli Robinson. I'm going to just drop my last name for context, yeah, because I inherited that through marriage. So technically my name is Awapuhi Kahlouly. I'm alive today continuing to carry my kupuna and my heritage into 2024. . . . I am grateful because I know where to start searching for what is owed to my family. The last name Kahlouly is a linear heir to Kahanahāiki, also known as Makua, which was posted and acknowledged in the newspaper in 1858. That's 166 years my family has been carrying my name. . . . I wish there was more of my family here, but most have moved from our aina. Died trying to win it back, and there's just not enough of us left. This is for my papa, John Mack Choochoo Kapule Ka'aiohelo Kalauli Ka'awa kaleikula. Our grant number is 2362. Our land commission award is 556, I don't know the dot, 1 and 5562. The tax map key is 181001011. It belongs to the United States. . . . I am here in</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>opposition of the lease continuing. I request that, at the very least, my family's lands be returned. I look at this room. I cry for our people. We are here today pleading for our existence and yet, what reparations have been given? . . . . Speaking of reparations, will the mauka to makai report from October 23rd, 2000, be applied to the Hawaiian people? What is that report? I will tell you. It's called from Molu to Maki the river of justice must flow freely. . . . It is a report of reconciliation process between the federal government and the native Hawaiians prepared by the Department of Interior and the Department of Justice in October 23rd, 2000. This is 2024. Is the 95 pages that you guys put together ever going to be done? Is anything going to be done? . . . . I have also read the land surplus lease summary that's in the Hawaii.gov website. It's public lahui. You can see they've taken over 432,000 acres. Can the native people not have something? It's called land surplus, just give it back. . . . Why am I here? Haven't the federal government taken enough from my family? Haven't you taken enough from the lahui? My family alone has lost lands in Makua, Nawiliwili, Waiahole, Kahaluu, KuKuiopae, which is Oceanview. They changed the name. Paalaa Kai, Waipio, that's in Oahu, Kau, and who knows how many more lands. How many in this room have lost lands as well? I stand here today to say this isn't over. Until the reparations are provided and the native Hawaiian people can rise, until the lands are returned and our people stop dying. And I am in direct opposition because I am the heir to my family, the Kahlouly family and our name is Kalauli-pauliuli-auheaokekoa and we will not allow the United States to continue leasing our land.</p>	
<p>Awapuhi Shaunelle Kalauli Robinson</p>		<p>Aloha e nā kānaka a pau, e nā kānaka ‘oiwi, e nā kanaka maoli. Aloha. Okay. Aloha. I am Awapuhi Shaunelle Kalauli Robinson. And in my previous testimony, from akua, it was claiming my Kalauli name. Well, akua must have had a plan for you, that they wanted to bring in my "Robinson" last name. Who knows? Maybe it's coincidence. Maybe it's meant to shake some tea leaves. The land that the military is operating on in Poamoho was given to James Robinson -- sorry, I don't like him, for the record -- by Kamehameha</p>	<p>Please see General Response.</p>

Commenter	Submitted By	Comment	Response
		<p>III. It's in the EIS, page number 73, Grant Number 973. When we see these types of coincidences, we call it ike from akua. Prior to the Robinsons, it was government lands, which would go back to the crown. And before it goes to the military, it would go back to the native Hawaiian people. They use our royal patents to sell properties, to designate land divisions, take our iwi and take our identity. They just changed the name to Tax Map Key. Martin Luther King said, "Oppressed people cannot remain oppressed forever. The yearning for freedom eventually manifests itself." This is a letter between William Little Lee to his friend Caroline in 1849. Who is William Little Lee? For everybody who doesn't know, that's Charlie Reed Bishop's best friend. They came together on the Henry in 1846. He became a supreme court judge in the Kingdom of Hawaii. This is what he writes about us, to his friend in 1849. He said, "This nation will soon pass away and give place to the more sturdy Saxon. The white man, with his civilization, seems to carry effeminacy and death into every savage nation he visits. Depopulation is at work throughout Polynesia." William Little Lee became a judge, and I think he judged us all by depopulating our kanaka every single day. I want to hold space for Kanaka Maoli in this room, to say, "Never give up; never back down," because even if they tell us our kingdom doesn't exist, we are walking, breathing reflections of our koko. I think I can speak for everyone in this room, and say: Enough. We don't want you here. We oppose every continuation of any kind of occupation of our Hawaiian Kingdom. Give our people hope. Let us go to bed just one night, one night with peace in our pu'uwai. Aloha nui. Mahalo.</p>	
<p>Awapuhi Shaunelle Kalauli Robinson</p>	<p>Awapuhi Shaunelle</p>	<p>Can we validate that the terms and conditions of the lease are being met? According to this summary there are no mentions of military operations. Can you validate that the military is also operating in separate leases?                      This is the document I am referencing.  <a href="https://lrb.hawaii.gov/wp-content/uploads/1969_PublicLandPolicyInHawaii_AnHistoricalAnalysis.pdf">https://lrb.hawaii.gov/wp-content/uploads/1969_PublicLandPolicyInHawaii_AnHistoricalAnalysis.pdf</a></p>	<p>Appendix G includes a copy of the leases for the lands that are subject of this EIS. Section 3.2.5 has been revised to include the status of State inspections of the leased properties.</p>

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		<p>I also would like to reference the Hawaii Constitution Article XII section 7.</p> <p>Will the army consider returning the lands to the rightful patent holders? I am attaching my families patent as a reference. I also would like to acknowledge that native Hawaiians have rights they are afforded to them and continue to be ignored.</p> <p>I would also like to reference the Mauka to Makai report that was created by the department of Justice and Department of interior. Here's the reference link:  <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></p> <p>Will you be honoring your commitment to the native Hawaiian people and the reparations that are due to them?</p>	
Awapuhi Shauhelle Kalauli Robinson		<p>The decision for the land lease to continue should be made with the Native Hawaiian community, including the lineal heirs. I am stating for the record my lineal rights to the land of Kahanahaiki Grant 2362 land commission 5556: 1/5556:2 tax map key 181001011. I am in direct opposition to continuing the leases.</p>	Please see General Response.
Awapuhi Shauhelle Kalauli Robinson		<p>My dream as a Kanaka Oiwi is to rest peacefully on my home without the fear of removal or the pressure of violence executed upon our people. The native community has limited resources to continuing practicing ancestral rights. We have been free of war and threats of war. These lands that are being debated is a small fraction to the 432,000 plus acres the military hold in their inventory. I directly opposed the continuation of the military occupying our native ancestral lands.</p>	Please see General Response.
Jessica Robinson		<p>give the lands back to the people. what good has the army done for the island and its residents in the last how many years?</p>	Please see General Response.
Kimmer Robinson	Protect Mauna Kea	<p>USAG Hawaii Commanders: According to the person-in-[social work]-environment model the U.S. Army reservations on Hawaii cause a lethal threatening posture against its original inhabitants, the Kanaka Oiwi. Kaala Mountain, Kukaniloko and designated burial sites, sacred hei’au places must be accessed by Kanaka Oiwi. The military bases, Wheeler, Schofield and Navy, CSA bases all cause a</p>	Please see General Response.

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		<p>barrier to the spiritual, emotional, mental and physical health of this country Kingdom's first inhabitants. The UXO's, developed burial grounds, loud aggressive noises from helicopters, fighter jets, diesel trucks, machine guns, pistols and grenades all cause detrimental effects to the spiritual and mental health of Kanaka O'ahu leading to depression, anger, loss, suicide and substance abuse. [Organization: Protect Mauna Kea]</p>	
Darlene Rodrigues		<p>Amen to that. Aloha kakou. (Speaking in Filipino). That's the language of my mother. My name is Darlene Rodrigues. I'm a resident of Mililani, born and raised here in -- in Wahiawa. I am also a Gold Star family member. My cousin was killed in Iraq, and she is an alumni of this school. I work and worship at a church nearby. The leases to the US Army should not be renewed due to the following reasons. Hey, did you guys know Wahiawa was in the Guinness Book of World Records? I learned this when I was, like, eight. Most churches on California Avenue. Kind of unreal. The thing is, we will not go into any of these other sacred and religious places of worship and have target practice, leave toxins and pollutions, harm the neighbors around the places with noise, and all that other kind of stuff that all these people have talked about. I have had the privilege and blessing to have visited the ahu and sacred sites at Makua. And the idea that these important religious sites are bombed and then fenced off from people who deserve to be there greatly offends me and my Christian spirit and soul. It harms my well-being as a keiki o ka 'aina. And I truly believe -- we heard the words "illegal." I want to tell you, this is sinful. I want to use the word of "colonization." How shame. I am a member of the United Methodist Church, which is a worldwide church, with millions of members, and it has recently recognized its responsibility for causing harm in Hawaii and its participation in the illegal overthrow of Queen Liliuokalani. In April, it apologized to the indigenous people of Hawaii for the oppression and continued harm that Christianity has brought in Hawaii. It's time that the US military also does the same. And I look at you and those in the camera. Do you have the moral courage and bravery that you have on the</p>	Please see General Response.

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		<p>battlefield to do what's right? Can you look past your duty, and truly look at what's around you, and listen deeply to the people of this community?· Do not renew the lease, clean up the mess that you have made, and leave this place. I just want to say, lastly, that our well-being in Hawaii and in this town is not dependent on the presence of the US military here.· That -- that is a false narrative, much like the narrative that Christianity is the only way to the sacred and the divine.· Do not use that excuse to keep bombing places here.· That is sinful and un-Christian. Do not get comfortable.· You are the visitors.· You do not have an automatic subscription to the 'aina.· Clean up the messes that you've made, and leave this place.· And always the people of this and have the last say.</p>	
Sparky Rodriguez		<p>Aloha.· Thank you for your courage coming into Waimea.· You can see some of the community involvement.· So over 2,000 pages. I don't understand what's written there.· So I would like to suggest and recommend the Army coming up with funding so that we can go out and look for an expert to explain all of those words and the implications and the impact to us so that we're not agreeing to something that turns out to be a lie. . . . . Okay.· So that's one part.· Oh, what's going on here?· This thing is taking notes.· Sorry. I lost my notes.· Within the EIS there is three options.· <u>We need a fourth option, and the fourth option is no retention, cleanup of all the land, and return it.</u> . . . . . Now, we've talked in the past about returning land and the government, the military, has no mechanism to return land, but there was a mechanism to take land.· So there must be a mechanism to return.· And the idea of cleanup means that it needs to be to our standard of cleanup so that we can plant food, so that we can live on it, and our children can grow up without risk of contamination, disease, or any type of issue caused by the contamination.· So as with Red Hill, drinking jet fuel doesn't really work, and now that the court says there's no real connection to the illness and the cause. . . . . So we want to make sure that we can prevent some of that.· So, again, no retention, clean it all up, and return it all to the kingdom, and that includes a complete</p>	<p>The No Action Alternative analyzed in the EIS is no retention of state-owned lands after expiration of the leases. Lease compliance actions and cleanup and restoration activities which would occur upon expiration of the leases are discussed in Section 4.2.4.</p>

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		<p>return of all the lands that the military occupies. . . . And I notice within the military, you have all these different departments. You got Marines, you got Navy, you got National Guard, you got Army and Navy. I'm not interested in those separations because it confuses the issue. Occupation is occupation. The return is the return. So as an occupying Army, must be enforcing kingdom law and not the law of the occupiers. So how do we make that happen? . . . . And finally, clean all occupied land, restore it to pre-use and pre-occupation, make it a hundred percent to our standard. So it's not the experts that are PhDs, we need our own access to PhDs to question and do peer review. Thank you.</p>	
David Lee Rogers		<p>I oppose the continued lease of the lands of Hawai'i by the US military. I was a 21 year resident of Hawai'i and a three-time graduate of the University of Hawai'i at Mānoa, including a degree in secondary education for French and Hawaiian languages. I spent years reading and hearing about the egregious acts of the US government and its military in the islands. I read more than just second hand accounts. I have read original source documents. The US minister (ambassador) to Hawai'i under the Benjamin Harrison administration described Hawai'i as a fruit ripe for the picking, and he reveled in the population decline of the indigenous population and its leaders. In January 1893 over 160 US marines facilitated the overthrow of the Kingdom of Hawai'i against a valid treaty of friendship the US had with that kingdom. In spite of the precedence 50 years earlier when Queen Victoria, friend of Hawai'i's monarchy, re-established Hawai'i's sovereignty after a rogue British official usurped control due a land dispute, President Grover Cleveland who was personal friend of Queen Lili'uokalani did not respect and recognize that same friendship and her sovereignty as Queen Victoria had done. He did not restore her to power, allowing foreign agents and their descendants to establish an oligarchy against the wishes of the indigenous population. Over a century later, the state of Hawai'i as an integral part of the government that continues to ignore the sovereignty of the original people has allowed the US military to use lands that were once a</p>	Please see General Response.

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		<p>part of that kingdom that the same US military helped overthrow. Just as abhorrently, the US military has worked out a sweetheart deal to lease that land for a whopping \$1 per year. This is a slap in the face to people who are largely landless, with them looking at land set aside to rehabilitate them and provide places to live being bombed instead by that same usurping and occupying force. This US military pays \$1 out of a multi-BILLION dollar budget, a budget that these same people pay taxes into as required by law of the same constitution that the US military swears to uphold. By the Hawai'i state constitution 20% of funds gained from the crown and ceded lands would go to help the indigenous Native Hawaiian people aka the kānaka maoli. That is 20 cents total out of \$1. For over 200,000 kānaka maoli that is 1/1000th of one penny per person per year.</p> <p>The audacity and arrogance it takes to sign such an agreement! It is even more audacious and arrogant to include in the same lease a stipulation that the military does not have to clear up its mess if the military deems it too expensive! Appalling! The military spends one dollar to lease land, saving thousands and even millions of dollars that it is really worth, and the military wants an out to forego clearing up land originally meant for those in need, those whose ancestors lived in the islands for a millennium. Instead, the military comes up with placations that they would do x or y. X or Y is irrelevant when desperately needed lands contain ordinance rendering it useless and dangerous.</p> <p>There is a finite amount of land on this planet, and nowhere is that more obvious than on an island of 597 mi<sup>2</sup>, some of the most expensive land in the world. The US military has already demonstrated its true intentions with Kaho'olawe - bomb, destroy, and act like their multi-billion budget is just so tight. They lie to people - they blew a hole in that island's cap rock exposing the island's water table to contamination, and a US Navy official claimed instead that this hole they created with a bomb actually helped the island's water supply. I watched a video of exactly that when I was a UH student. I remembered the audience in the video</p>	



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		<p>laughing in incredulity. This is an example of the US military and its lack of care for Hawai'i, the land and its people. This claim betrays the unspoken opinion that the US military has of the people, that they are dumb enough to believe such a blatant lie. I would laugh like that audience, a true show of aloha at the insult to their intelligence, but I grieve knowing how implicitly racist and condescending that claim really is, and how it is implicitly indicative of the fact that the US military will continue doing what they want until they are forced to stop.</p> <p>Further to that point is the most recent incident at Red Hill where the US military poisoned the drinking water of its own active duty military and its dependents, all the while their first response was "everything is fine, nothing to see here", while their own members suffer which is yet another insult to people's intelligence. Indeed, if the US military can malign and injure its own people through its own mismanagement of land and natural resources, there is absolutely no reason to believe the US military would be proper stewards of other land they have no business leasing in the first place.</p> <p>In Hawaiian, there is a proverb, an 'ōlelo no'eau "I ka 'ōlelo ke ola, i ka 'ōlelo ka make." which loosely translated means that the spoken word has power and substance and meaning. Yet, we can contrast that with the English saying "Actions speak louder than words." because in Western culture a person's word has lost value. What a person does is more indicative of who a person is. By extension, what the US military has already done has demonstrated far better than any inane promises it could ever make towards their use of Hawai'i's land. It should be no wonder that people vehemently oppose the continued lease of these lands.</p> <p>There was a crescendo and peak in the Hawaiian Renaissance at the centennial of the overthrow in January 1993. I was at 'Iolani Palace that day, and I participated in the march that was expected to draw maybe 1100 but instead drew 10 times that amount. It seemed to be a shock to the government that so many would show up.</p> <p>Previously, sovereignty leaders like the late Dr. Haunani-Kay Trask</p>	

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		<p>were often seen as the angry crazy fringe radicals, and yet there were 10000-11000 behind her that day, including me, all voicing the same lamentation that a sovereign nation had been destroyed by foreign capitalist and imperialist desires.</p> <p>That same US constitution that the US military swears to uphold purports to offer all sorts of freedoms including democracy, including a voice to the people. Yet, there is one freedom it does not grant to the indigenous peoples within the US borders, and that freedom is the most important: the freedom of self-determination. It is the freedom to choose not to belong to a country that stole its lands, its government, its laws, and then that same invading and colonizing country purports to give the freedoms it stole back to them and demands allegiance and thanks for that duplicitous act. With that freedom of self-determination, the indigenous peoples like the kānaka maoli can give themselves all the other freedoms, rendering the US and its constitution irrelevant to them.</p> <p>Some may feel that there is an option to wait it all out, that the Hawaiian Renaissance will die down, and its supposed romanticized notion of regaining an independent country will dissipate. That is in itself a very naïve notion indeed. Just as many did not expect such a crowd on that sunny morning in January 1993, many have not been paying attention to the overtones of opposition that have continued since that other morning 100 years prior in January 1893. With songs like Kaulana Nā Pua from 1893, Hawai'i '78, and Living in a Sovereign Land in the 90s by Hawaiian Style Band and Israel Kamakawiwo'ole, the people have been voicing opposition in song for that entire century. These songs are considered classics and beloved expressions of their desires to regain what was lost and to lament the lack of freedom the US truly offers. Have people not been listening to the voices on the radio telling everyone how they feel??</p> <p>Quite to the contrary that the Hawaiian Renaissance will die off, the worsening socioeconomic plight portrayed in Hawai'i '78 should be the true indicator that these voices will not go away. As long as the US government and its military maintains an occupying presence in</p>	

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		<p>the islands, maintaining not just a political status quo but a capitalist status quo that leaves the kānaka maoli behind, the voices of opposition will only get louder and more numerous. The demands to depart will only grow stronger and more numerous. In my 21 years on the island particularly my time as a Hawaiian language student at the University of Hawai'i, I have heard many times the call that the haole should go home, that every person moving in is taking up a space for those already there, particularly those kānaka maoli whose ancestors lived successfully for a millennium without the need of the US, the US military, and the US constitution. I did not take it personally nor did I take offense. I cannot take offense at the truth, at the harsh reality that they are facing while I enjoy a roof over my head teaching at a high school next to a homeless encampment. I did leave back to the continent for several reasons, not just that. I suffered financially while I lived in Hawai'i myself, managing only by overwork and the grace, hospitality, and generosity of those same people who would rather have me leave.</p> <p>By the same token, it is time for the US and the US military to leave, not just these thousands of acres but leave the islands as a whole. The US and its military prop up a capitalist system and a pseudo one-party democracy in the State of Hawai'i, and it has been a system well documented throughout history to be one at the expense of the indigenous kānaka maoli, a system put in place with the assistance of the same US military that day 17 January 1893. Remember the words of John L Stevens rejoicing at their ancestors' deaths. Any celebration of the renewal of the lease of these and other lands is just a continuation of his contemptuous sentiments. I left Hawai'i. Your turn.</p>	
David Lee Rogers		<p>This US military pays \$1 out of a multi-BILLION dollar budget, a budget that these same people pay taxes into as required by law of the same constitution that the US military swears to uphold. <u>By the Hawai'i state constitution 20% of funds gained from the crown and ceded lands would go to help the indigenous Native Hawaiian people aka the kānaka maoli.</u> That is 20 cents total out of \$1. For</p>	<p>Sections 2.4, 3.1.3, and 3.2, and Appendix G of the Final EIS have been revised to clarify the assumption that a new lease or arrangement for fee simple Federal ownership would be negotiated at no less than an equitable, fair market value with the State. Land retention</p>

Commenter	Submitted By	Comment	Response
		<p>over 200,000 kānaka maoli that is 1/1000th of one penny per person per year. The audacity and arrogance it takes to sign such an agreement! It is even more audacious and arrogant to include in the same lease a stipulation that the military does not have to clear up its mess if the military deems it too expensive!</p>	<p>negotiations, including compensation for use of the State-owned lands, would be initiated following completion of the NEPA/HEPA process.</p> <p>Section 3.6.5 revised to clarify that 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 lands not retained). After the lease expires, the Army would follow applicable regulations to determine how and when the cleanup and restoration of State-owned lands not retained would occur.</p>
Tara Rojas		<p>Aloha. Tara Rojas. So I just want to bring a lot of this hewa that has been hidden to the light. So from this <a href="http://www.history.navy.mil">www.history.navy.mil</a>, the development of the naval establishment in Hawaii, but includes the Army, an administrative history. It says -- these are just excerpts. "In 1895, when the royalists attempted a counterrevolution an American warship's presence dampened the possibility for its success. The provisional government under Sanford Dole made the final appeal for annexation when the military necessity of the islands became apparent." . . . . This is -- this is false narrative. Hawaii was thriving before you all arrived. Annexation was approved on July 6th, 1898, and on August 12th, 1898, the U.S. flag was run up over the palace hewa loa and, by the way, that's false, there is no treaty of annexation. . . . . And it says here, another excerpt the conniving-ness of the military here in Hawaii. "One of the early concerns of the growing station was that the Army would make claims on its property. Because of their facilities as wharves, cranes, artesian wells, and coal supplies, many requests were made by the Army for their use. . . . . "By February 1901, the Army had made application for the privilege of establishing on Navy docks moveable cranes for handling coal and other stores, a saluting battery and a flag staff on a naval reservation, and an artesian well of its own. . . . . "All these requests were rejected by the Bureau of Equipment on the theory</p>	<p>Please see General Response.</p>

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		<p>that once granted they will practically constitute a permanent foothold on the property, and end in dividing it between the two departments or in the entire exclusion of the Navy department on the ground of military expediency as established by frequency of use." So I say to that, so if Kanaka Maoli can by frequency of use take back and live on their land, then all land should be returned.· Yeah?· And it says right here, I'll skip on this, well, I have to -- I have to include this, "However, the Army Depot Quartermaster Honolulu contracted for the sinking of an artesian well on a naval station with the commander's approval, who, in turn, acted on the recommendation of the Bureau of Yards and Docks. . . . . "The flow of water obtained amounted to over a million and a half gallons per day, sufficient for all purposes of the Army and Navy. The Bureau of Equipment felt that its word of caution was justified when the Depot Quartermaster in 1902 let it be known that any water by the Navy from the artesian well was only given by courtesy of the Army." . . . . . So all this usurping of the land continues in this document.· Basically, there is no price on the land.· And I'm just going to end with this last one, it says, at the end, "In an intelligence report of 1928, the commandant accused the territorial governor of playing politics on the racial issue. He felt that the Governor and administration resented the keen interests manifested by the Army and Navy officials in the population problems of the islands.· It was his opinion that prominent businessman regarded the Army and Navy establishments as constituting the fourth largest industry in the islands, after sugar, pineapples, and the tourist trade." . . . . . These -- these do not represent Hawaii. Enough is enough and finally, just an analogy. I thought of this.· Your presence here, the military's presence here, is literally like those new rubbish cans in Waikiki.· Basically, they're -- they're unnecessary and they only pollute the area.· So, by the way, I told the general face to face in the BLNR meeting that we do not want any lease renewal, to clean up and leave in 2029, so to him as well as to you, please take it up the command.· Mahalo.</p>	

Commenter	Submitted By	Comment	Response
Tara Rojas		NO IS NO = WE OPPOSE THE RENEWAL OF MILITARY LEASES IN HAWAI‘I. NO LEASE RENEWAL.	Please see General Response.
Rosanna Rombawa		The US military should not control ceded lands that belong to the beneficiaries of these islands. We need land for cultural resource management, a healthy ecosystem, housing, education, and restoration of all the damage caused by the US military. Your retention and recruitment rates are in crisis. The DOD has failed an audit for the last five years in a row. Your navy has poisoned our drinking water with jet fuel and refuses to remedy the situation. Your Navy has a 20 acre oil plume in our ocean as of the year 2015 with no action to address it. Your RIMPAC war games fire rounds the cost upwards of \$1k-1mil per round and sink ships in the middle of the ocean. The list of the military's harm done to our island's natural resources are endless with no plans to tangibly mitigate or restore. I haven't even referenced the historical harm to our independence as a sovereign nation or gender based violence. We're better off without your presence. I strongly oppose the lease renewal.	Please see General Response.
Richelle Ronalds		Good evening, everyone.· And aloha. I'm -- I'm Richelle Ronalds. I'm a Kanaka Maoli, and I am of Kanaka Maoli ancestry, and a supporting member of the Palestinian Coalition of Hawaii.· It's an entity of collective organizations and individuals that are working towards a common goal to end the colonization globally. I am a resident of Wahiawa, and I lived in Wahiawa most of my entire life.· I moved here since my freshman year of high school, and I graduated from Leilehua in 2006. Unfortunately, most of my memories of high school are not of laughter or cheerful moments with my peers, but occasionally sitting in a darkened classroom due to the power outages, and hearing bombs being tested, probably in the forestry area behind the school. I remember how buildings tremble and portables shook. These are from -- probably from bombs that are being tested by the US military in preparation for wars, such as the current ones we we are witnessing in Gaza. The US has sent 25 billion of it.· This includes 3.8 billion annually from the Obama administration to Israel.· And these are taxpayers'	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>money that could have gone to our ailing communities like Lahaina. Yet it is going towards aiding settler colonies and displacing indigenous Palestinians from their homelands. While lands are being occupied and trained training exercises are being conducted, it leaves a harmful impression on our lands that impose a threat to the indigenous communities. These military exercises contribute to the extinction of native -- native species that cannot be found elsewhere, and prohibiting indigenous populations from being able to access their own resources and/or practice from their ancestral lands. Today would have been my late grandfather's 94th birthday. But my family and I wouldn't have known if he would have lived to live a glorious age because he passed from leukemia when my mother and her siblings were children. My grandfather was a part of Operation Wigwam, which remained classified for 20 years. It was a single underwater nuclear test that charged a bomb 600 meters deep to determine the vulnerability of submarines to -- to its nuclear explosions. The Centers for Investigation Report found that nearly 40 percent of the interviewed Operation Wigwam veterans recall having no radiation detection badges during the nuclear test. This was 30 kilotons, more than twice the size of Hiroshima's atomic weapon. Despite the Navy's contention that no servicemen were closer than 5 miles to the blast, the logs of my grandfather's ship showed that it was being well under a mile from the bomb detonation site. Many weren't informed that they had participated in a nuclear test until several weeks Operation Wigwam was over. My grandfather's debt was not only the blame on this operation, but Joan McCarthy shared that moments before her husband's death after the detonation, for as far as the eyes could see, that the oceans was covered with dead marine life. She had expressed this at a president advisory committee in 1995, and also stated that Operation Wigwam was a human radiation experiment that caused the death of her husband. With all the testimonies I've heard since Tuesday and testimonies from throughout my life, I stand here today to testify my strong opposition on renewing the lease to the US military, and also state</p>	

Commenter	Submitted By	Comment	Response
		<p>that we should divest from the -- the US colonial government as well, as it seems clear that during their tenure it only worked for their benefits, and not for the people. It seems clear that they do not have the capacity to not only care for civilians, but also our lands, water, and seas too, basic fundamentals that our people wish to uphold. We've also witnessed the lack of moral standards and principles of not only our indigenous ancestors, but all indigenous nations of the world too. So I would like to leave with you all tonight with great words from my friends from Kona for Palestine. Our collective liberation is directly affected by the global imperialism. And so a free Palestine is a free Hawaii, is a free Congo, is a free Sudan, is a free Haiti, is a free Papua, and is a free Turtle Island, so on and so forth. Thank you.</p>	
Ki'inani Rosario		<p>Mahalo. Aloha. Aloha ahiahi kākou o Ki'ilani ko'u inoa, no ke awawa o Waianae mai au, he haumana au I ke kula nui o Hawai'i ma Mānoa. . . . . My grandfather, Sergeant 1st Class John Rosario, III, served in two wars for the United States. My dad is contracted with the United States Military. He does engineering work for them. But both my papa and my tutu died early. My papa due to brain cancer, and my tutu, lung cancer. My baby sister passed away at the age of two years old due to complications. . . . . And all of these deaths, I can't say a hundred percent is due to the effects of growing up right next to somewhere that was consistently bombed, but I cannot help but think. . . . . And it's bad enough that I lost my grandparents early, that I lost my sister, but do I have to keep thinking about my children and their children? How much longer? That's all I have to say.</p>	Please see General Response.
Malia Rossetti		<p>Aloha kakou. My name is Hannah Malia Rossetti. I carry my grandmother's name and I'm here for her today, our kupuna. I'm here for students, for my own keiki, for our future. I'm here for the people who came before me, for the people who will come after me. Especially for them because, especially as a kumu, as somebody who grew up in this community and who is now raising the future of this community, I need you to know that it's time to leave. . . . . The hewa that I carry in my heart, that all of the people</p>	Please see General Response.



Commenter	Submitted By	Comment	Response
		<p>here carry in our hearts, that my grandmother, my great-grandmother carried until they died. I don't want that for the keiki of Waianae. I don't want that for the keiki of Oahu, of Hawaii, of Pacifica. . . . This is not supposed to be happening here. It shouldn't have started, and now there's an opportunity for it to end and that opportunity should be taken. It's a very serious matter because you folks don't see the faces the kids make when they realize that the facts I put in front of them are real. And they realize there is a lot more built against them than they thought. And they know that there's already a lot against them coming from out here. . . . So on behalf of my kupuna, on behalf of all my keiki in school, the one I have at home too, it is time to go. Mahalo for your time.</p>	
Colleen Rost-Banik		<p>Aloha. My name is Colleen Rost-Banik and I am a resident of Honolulu. I would like to submit testimony in opposition to the renewal of the military leases on Oahu--at Kahuku, Poamoho, and Makua. The US military is one of the largest polluters of land and waters in the world. Each site that is occupied by the US military has had significant adverse impacts to the environment and its people. In ending these contracts, the US military has the opportunity to provide a new model of partnership--one that doesn't rely on theft, imperialism, and destruction but rather attends to caring relations with people and the planet. The US military bombs and chemicals that pollute land and waters and the US military lies and manipulation that pollute relationships will never lead to a world with security. Caring relations is what truly creates peace and security. If it is actually security that the US military is interested in, they must begin with terminating the military land leases on Oahu. Mahalo for your time.                      Colleen Rost-Banik</p>	Please see General Response.
Sharon Rowe		<p>I am writing to oppose the extension of military leases in Hawai'i. History is the argument. Since the United States first claimed an interest in Hawai'i it has seen Hawai'i solely as a means to its military ends. Never has the well being of the people of Hawaii nor the unique environment of Hawaii been a concern. The destruction</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>of the environment has been the result with its consequence being the health and well being of native Hawaiians and even the military’s own. This has been most clearly illustrated by the exposure of Red Hill to the public, which shows how little concern the US military has had for human well being, to say nothing of its lack of concern for the well being of the environment. But the age of imperialism needs to end. An extension of military leases will only further the continued ambitions of the US governments to employ its military to extend its power, hiding this simple motive beneath an appraisal of US security needs, and pointing to the economic benefits such needs bring to Hawai’i’s citizens. We must be brave enough to forego the fears that underlie such rationale and put the needs of people and environment first. Please withdraw.</p> <p>Sharon Rowe            citizen</p>	
Alicia Rozet		<p>Aloha ahiahi kakou. Aloha ahiahi kakou. My name is Ali Rozet. I am from Kailua, Oahu. My family now reside in Wahiawa. I’m a kumu olelo Hawaii. And I am -- I’m not Hawaiian. I’m Okinawan and Mexican. But I’m a proud mother of four Hawaiian keiki, and I’m trying to do my best to the lāhui. I here to ho’olu lāhui. Anyway -- only with him, though. Sorry. That was not an invitation. My -- as my fellow mama friend Malia said, it’s unfortunate that this is the type of family outing that we have these days. But I have brought almost every one of my keiki up to the podium to speak on behalf of what I believe is the pono way to go about malama-ing this place that we call home. I just want to say that, in the past – I want to tell this mo’olelo for the women in the audience. Because over the past few months, I’ve had the -- the great privilege of being able to hike into the back of Makua Valley. In the back of that valley, after you’ve hiked hours and hours, there is a hale o papa. It’s a traditional place of healing for women. It hurts me to drive through Waianae go to that place, knowing that there -- it will probably take a lifetime for all of the wahine who live in Waianae and on that coast to be able to go there for healing. But as a kumu, I’ve made it</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>my job, my mission, to make sure that I bring my 'ohana back there, and that they tell their 'ohana, because it's really for the people of - of Waianae, first and -- and foremost. When we heal our women, we can heal our children, we can heal our men. I believe that that's honestly what this -- what the lāhui needs. And it's sad and laughable to me that the so-called archaeologists and experts who work for the Army -- who take us, and escort us like they're welcoming us into their home -- have no idea, absolutely zero clue of why that place is -- is special. They're asking us -- oh. Try telling us what that ki'i pohaku means. Do you guys know? I'm like, what are you doing back here? You -- you cannot pick up a book -- you cannot read about ki'i pohaku. You don't know what a hale o papa is. And so I want to see my haumana, I want to see native Hawaiian keiki getting those jobs, if it -- you know, if anything, to be the ones who speak for their 'aina; not the military. All I want to say -- I'm sorry. I'm here because I want my children to always feel that they can live here. I never want them to feel that they have to leave Hawaii. And the occupation of the Army poses and obstructs that vision that my husband and I have for our keiki, particularly, you know, specifically the RIMPAC, the fisheries. How -- how is that going to affect the -- if our keiki live here, how will they eat and how will they stay healthy for generations to come? I'm sorry. Irene Kaeo Niau Maynard, she is the great-grandmother of these keiki here. She was the member -- she was a member of Ka Lāhui Hawaii, and today would have been her 90th birthday. In 1983, 41 years ago, she was evicted from Makua Valley Beach. And luckily, we have a recording of her saying that she believed in the akamai of our keiki, of our future generations, that she believed that they would stand up for this place. And so I just want to say that this -- this here is for Tutu Grandma Hawaii. And also, I just want to end with, I hope that we don't have to continue doing this. I hope that my keiki, as they have their keiki, will not have to continue attending these meetings. But if they do, I just want to say that my grandmother, who's Okinawan, just is about to celebrate being 100</p>	

Commenter	Submitted By	Comment	Response
		<p>years old. So that is running through their genes. So we will see you over the next hundred years. I promise you that.</p>	
<p>Raquel Runnels</p>		<p>Good evening everyone and aloha,                      I'm Raquel Runnels, I am of Kānaka Maoli ancestry and a supporting member of the Palestinian Coalition of Hawai'i, an entity of collective organizations and individuals that are working towards a common goal, ending of colonization globally. I am a resident of Wahiawa, I have lived in Wahiawa most of my life, since my freshman year of high school. I graduated from Leilehua in '06. Unfortunately most of my memories of high school are not of laughters or cheerful moments with my peers but of occasionally sitting in a darkened classroom (due to a power outage) and hearing bombs being tested, probably in the forestry area behind the school. I remember how the buildings trembled and portables shook. These are from bombs that the US military use to test and train its troops in preparation for wars, such as the current one we're witnessing in Gaza. The US has sent a total of \$25 billion, this includes the \$3.8 billion annually that the Obama administration has promised, to Israel. These are tax payers money that could have gone to our ailing communities like Lahaina yet it's going towards aiding settler colonies and displacing indigenous Palestines from their homelands. While lands are being occupied and training exercises are being conducted it also leave a harmful impression on our lands and imposes a threat on the indigenous communities. These military exercises contributes to the extinction of native species that cannot be found elsewhere and prohibiting indigenous populations from being able to access their own resources and/or practices from their ancestors.                      Today would have been my late grandfather's 91st birthday. My family and I wouldn't know if he would have live to a glorious age because he passed from leukemia when my mother and her siblings were still children. My grandfather was apart of Operation Wigwam, which remained classified for over 20 years, it was a single underwater nuclear test that depth charged a bomb 600 m deep to determine the vulnerability of submarines to nuclear</p>	<p>Please see General Response.</p>

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		<p>explosions. The Center for Investigative Reporting found that nearly 40 percent of interviewed Operation Wigwam veterans recalled having no radiation-detection badges during the nuclear test. This bomb was thirty kilotons, more than twice the size of the Hiroshima atomic weapon. Despite the Navy's contention that no servicemen were closer than five miles to the blast, the logs of my grandfather's ship showed it as being well under a mile from the bomb detonation. Many were not informed that they had participated in a nuclear test until several weeks after Operation Wigwam was over. My grandfather's death was not the only one blamed on this operation, Joan McCarthy shared that moments before her husband's death "after the detonation for as far as the eye could see the ocean was covered with dead marine life." Mrs. McCarthy also expressed to President's Advisory Committee in 1995 that Operation Wigwam was "a human radiation" experiment that caused the death of her husband.</p> <p>With all the testimonies I've heard since Tuesday and testimonies I've heard throughout my life, I stand here today, to testify my strong opposition on renewing the land lease to the US military and also state that we should divest from the US colonial government as well. As it seems clear that during their tenure its only worked for their benefits and not for the people. It seems clear that they do not have the capacity to not only care for civilians but also our lands, waters and seas too. Basic fundamentals that our people wishes to uphold, we've also witnessed the lack of moral standards and principles to not only our indigenous community but all indigenous nations globally. So, I would like to leave you all tonight, with the great words of my friends from Kona4Palestine: "Our collective liberation is directly effected by global imperialism and so a free Palestine is a free Hawaii is a free Congo is a free Sudan is a free Haiti is a free Papua is a free Turtle Island" so on, and so forth. Thank you.</p>	
Laura Safranski		<p>Aloha. I'm Laura and I will keep it quick. I just want to say my personal belief I've learned so much living here that give it back. Just there's no reason to keep it. The unexploded ordnances, the</p>	<p>The U.S. Army Garrison Hawai'i is committed to transparency throughout the EIS process. The community is informed through public</p>

Commenter	Submitted By	Comment	Response
		<p>safety issue, is not enough of a reason to keep it. . . . . However, you've already mentioned that your preferred option is number two, a modified retention. So it sounds like this is -- might just be checking the boxes and, you know, I understand that's how you do things. . . . . <u>For the next one, maybe advertise and let us know. I received nothing in the mail. I had no idea this meeting was even happening except for these kind people. Nothing was sent to my -- I know you have everybody's address. . . . . The phone number being open for a few days, that's an insult. And then that testimony you do receive on the phone, can you please -- where is it? Where we can we know that you actually listened to it, transcribed it, because that is public testimony as well.</u> . . . . . And then my other half of my testimony is for my sister.</p>	<p>notifications and announcements--including regular notices and announcements, regarding EIS drafts, updates, public hearings, and comment periods. These are distributed through local media, community bulletins, and posted on our official website and social media platforms to ensure broad visibility.</p> <p>Legal notices for the Draft EIS public meetings were published in the Star Advertiser as updated in Section 1.5. The information for public meetings were published in the State's The Environmental Notice and Federal Register, and provided on the O’ahu ATR EIS website.</p> <p>Reproductions of all comments, including oral comments, submitted during the scoping and Draft EIS public comment periods have been included in Appendix M.</p>
Kalei Salcedo		<p>Aloha. I'm Kalei Nihipali Salcedo. I was born on the rich side, the Waianae side, from Nanakuli to Waianae. You have to remember the pain that we feel. It's not only in this room. It's all over. And what I mean by all over, in the continent, we have family on thinking it's cheaper, and it's not. . . . . All we had from you folks was broken promises. I promise we're going to provide this. I promise we're going to provide that. Broken promises. Okay. When you folks first came, 604, you folks dug up iwis by the rest camp. Transferred one section makua side. You guys turned around for burial site, dig up more iwis. Okay? And then you guys turn around and dump them at the Army yard. . . . . It's at Makua. They've put it there. How would you like I go there and dig up your loved ones and treat them like opala. They are not rubbish. They are my ancestors. They are spiritual healer to all of us. They are our spiritual leader. You folks destroyed them, but they live on within us because the spirit with the bless of kahuku it will always</p>	<p>Please see General Response.</p>

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		<p>live within our hearts. . . . . We're not going to stop. All I'm going to say it, your opala, your broken promises. We could never clean that land the way it's supposed to be. Because my brother had turned around doing a high wave, he got the back part of torpedoes that came up on makuasi. He used his truck to drag it up. I still got it. . . . . And people think, oh, how did we get a land at Kaia hau? Let me tell you. I have to buy that land. My ancestors, my family land back. I did not inherit. It was stripped. I brought that land back. The majority of Makua side is all real estate owned. They're not from here. This kanaka'ole off with my husband's help to buy a piece of my land back with my family name. . . . . So what I'm asking you, sir, you know you're the messenger. It takes a lot of the messenger. Stop the broken promises, shut your guys' doors. Clean it up because that land could never grow fruits or any type of food to feed what we need to feed. That land could never, but all we can do is grow pamara flowers. Flowers that you folks know when you come into the airport, the fragrance. . . . . Because we could never -- I would never allow any of these kanaka maolis to feed our own people poison lead. Poison. Decades and decades of poison. What not just -- it's not. How many years you guys' been spraying on that land? Our people did not know what that is. . . . . You folks been spraying that and pouring that on that land to keep the dust down. It breaks up through the years. It goes in the ocean. And you wonder why people get sick and you wonder why we're angry. Do the right thing. You came enough. Aloha does not mean resilient. Aloha does not mean dumping. Aloha does not mean bumping you -- you bumming. Aloha does not mean any of that. . . . . We showed you many years of aloha. Where the hell is your aloha? Zero. Remember that. We are dried of aloha, so we need to heal ourself to find back our -- find our aloha again. If you do that, you folks, aloha.</p>	
Christina Sanchez	Hawai'i For Palestine	<p>Aloha,                      On behalf of the Hawai'i For Palestine organization as Kanaka and allies, we object to the renewal of current Army illegal leases to</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		train on and occupy stolen Hawaiian Lands. Onipa'a, Hawai'i For Palestine	
Christina Sanchez		Aloha, I strongly oppose the renewal of the DEIS to train on and retain Hawaiian Kingdom lands. I am a settler who works and lives in Makiki, Oahu. I have resided here for 4 years. I am also the daughter of a 2nd generation Mexican veteran who served in the United States Army for 20 years. I have spent most of my life near military bases and have become very familiar with the web of destruction the Department of Defense possesses, tainting every aspect it proclaims to protect and serve. However, with my experience and knowledge of living near military bases, I have never felt such a palpable presence of military occupation until living here in Oahu. It became very prevalent that Hawai'i is the most militarized "state" of the nation. The army alone, not including the naval, air force, marine corps, and national guard, have been using Hawaiian lands for its resources infecting everything it touches. Your presence never had the Hawaiian people in your interest because you've poisoned their wai (water), have stolen their land, and continue to annihilate the aina with your bombs and weapons. Listen to the kanaka and do not renew these leases. You are endangering the land and the people. Your presence is not warranted or wanted, give Hawai'i their aina back. In solidarity, Christina	Please see General Response.
Emily Sanner		As a biologist, Army veteran, and informed, conscientious citizen of the mainland United States, I cannot justify the renewal of the lease of land on O'ahu go to the Army. As someone who spent time in, I saw the lack of regard for environmental regulations, even as an Environmental officer for my company. Regulations only get as far as the people that uphold them, and I can tell you, there's plenty of people in the Army who choose to take the easy way out of things and bury certain environmental disasters in the sand, both literally	Please see General Response.



Commenter	Submitted By	Comment	Response
		<p>and physically. The land belongs natively to the people of O’ahu, the indigenous communities. The Army has stolen and then destroyed too much land as it is from the true protectors of land in this country, and globally with their bases and training areas. Enough is enough. From an environmental standpoint, releasing to the Army for a training area would be detrimental. From a humanity perspective, how would you feel if your home was turned into an Army training base? The natural landscape and habitats you grew up with demolished only to train people for imperial violence. America is better than this and we need to do better to those who came before us and those who will come after us.</p>	
Tatiana Santiago		<p>I don’t support the renewal of military leasing of these lands. I’ve been a Kahuku resident for 30 years and have hear rounds of gunshots at night coming from the Kahuku military training area and it keeps me up at night literally hoping that we are safe as ohana. Another area of concern is the land that is being desecrated and not taken care of. There has been trash, bullets, and debri (hazardous) left on the land. This is not okay! Lastly the fact that these lands are being leased for \$1 is just appaling. When we as kanaka maoli are paying millions of dollars just to live on our land. I oppose the renewing of these leases. Please do right by the Hawaiians and find another place to do training so we can bring our aina back to life.</p>	Please see General Response.
Teri Savaiinaea		<p>Aloha mai kakou. my name is Teri Ke'alanaonaonapua Kiasivaiinaea. I've lived in Waianae for 26 years. I had worn my slippers. I took off my slippers because I am grounded in this community even though I wasn't born in this community because my grandfather was born and raised in Nanakoulie. . . . . I firmly and adamantly oppose to the military keep occupying. 2029 will come. 2029 you'll be gone, and that's what we ask of you folks. No more desecration. It has to end. Our people need healing. . . . . Sorry. I just feel the energy from the ground and it's really immense, and I just want this to end so our people can heal. My dad was -- my dad was drafted into the war, and he came back a broken man. He became an alcoholic. He beat my mom. And then</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>my uncle was a Vietnam and Korean vet, a 23-year Marine. He came back and he died painfully with metastatic breast cancer. A man having metastatic breast cancer because of the Agent Orange. . . . I served in the United States Navy, and I was torn between the two worlds and coming up here to speak, but I have to speak on behalf of my people because the pain has to end, and it has to end in 2029. Thank you.</p>	
Kawaiuluhonua Scanlan		<p>Aloha,                      My name is Kawaiuluhonua Scanlan and I am from Pālolo, O’ahu. I am writing in STRONG OPPOSITION to lease renewals for Kahuku Training Area (KTA), Kawaihoa-Poamoho Training Area, and Makua Military Reservation (MMR) on the island of O’ahu. The Army has proven time and time again that they are bad tenants, and they should not be given any more opportunities to destroy our ‘āina. Over the last 65 years, the Army has repeatedly bombed our cultural sites, polluted our land and water, destroyed native habitats, and desecrated burial sites. These harms are irreparable, and the Army themselves admit in their DEIS that there will be more significant adverse harms to these places if the leases are renewed. Despite their own recognition of the dismembering that will ensue, the Army has failed to implement plans to clean up the damage already done, nor are there any plans for future clean up procedures.</p> <p>In addition to my concerns regarding the environmental impacts of lease renewals, I am particularly opposed to the lease renewals because continued military presence in Hawai’i displaces our people from our land. The lasting presence of military personnel exacerbates housing competition, which decreases the availability of affordable housing and adversely impacts the ability of Kānaka Maoli to live in our homeland. The Admissions Act specifically set aside the leased lands in Kahuku, Makua, and Poamoho to be held in trust for the betterment of native Hawaiians, not to be leased the same military that illegally overthrew our Kingdom in the first place. Under the control of the Army, our lands have been exploited and used to rehearse wars against other people and their lands</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>overseas. This ends in 2029. After 65 years of mismanagement, it is time that the Army leave Hawai‘i for good. For all the reasons stated above, I am in STRONG OPPOSITION of renewing the Army's leases on O‘ahu and throughout Hawai‘i. Mahalo for the opportunity to testify.</p>	
Piilani Schneider		<p>To Whom It May Concern, I am 67 years old, born here and have Hawaiian royal lineage. I have tried to treat military with aloha all my life, but you have made it very difficult. You have desecrated our aina, you have stolen our aina, and you have completely disregarded your neighbors. I constantly hear and see low flying air craft. The noise pollution is deafening. There's a number of reasons you must leave peacefully and the main one is Kānaka lands needs to get back in Kānaka hands to restore it before it's too late. What you did to Kahoolawe, you are now doing deep in our sacred valleys. I HEAR the bombs and automatic assault rifles. STOP, just STOP If you ever want to enjoy Hawaii for its beauty in your lifetime. It's time to go now. For those of you who don't know, my grandmother would tell me horror stories of you bombing our people to illegally occupy our Nation on behalf of a handful of business men with profits on their agenda. One being Stanford DOLE. And the Apology Law of 1993 clearly states fact in agreement. Thank you for accepting this reality, and please leave before 2029. The sooner the better. Mahalo</p>	<p>Monthly training advisories are published to alert the public and neighbors of upcoming training activities that are louder in nature and may be heard outside the military installation. In addition to these notifications, U.S. Army Garrison Hawaii (USAG-HI) has established internal policies and standard operating procedures in an effort to minimize training noise and its impact on the community. These existing management measures are presented in Section 3.8.5 of the EIS.</p> <p>To alert USAG-HI of a specific noise complaint, please call the Community Concern Line at (808) 787-1528 or send an email to <a href="mailto:usag.hawaii.comrel@army.mil">usag.hawaii.comrel@army.mil</a>.</p>
Piilani Schneider		<p>I am 67 years old. I am Kupuna. I am a direct descendant of Hawaiian Royalty. I have tried to treat military with aloha all my life but you have made it difficult. You have desecrated sacred land. You have disregarded neighbors. I constantly hear you low flying aircraft, bombs and AR training. The noise is deafening, you ruined Kahoolawe and continue everywhere. Hawaii is the aloha of the world and US Military needs to leave well befor 2029 so that we, Kanaka, may regenerate this aina. You have a kuleana to the world to leave Hawaii. This is not pono &amp; the world is watching. Our</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		Apology law of 1993 clearly states fact in agreement with this illegal occupation.	
Hokulele Schurz		The US military has done far too much damage to Hawaiian lands and aquifers. Unfortunately, the list doesn't end there, it extends further to endangerment to already endangered endemic wildlife. In more recent news, CRB has been found in bags of soil from the Naval Exchange on base. Why should our lands be leased to a genocidal entities such as this? Entities that do nothing more than simply play with their bombs on our 'āina, I cannot even live in peace alongside military bases as they're often practicing with their automatic guns & bombs in the evening. This causes my entire body to tense and my dog stress. How long can we continue to live with all that you do?	Please see General Response.
Joel Schwartz		I am strongly opposed to the retention of leased Hawaiian lands by the US Army and gravely concerned that the Draft EIS only proposes three scenarios, all of which involve the retention of ceded Hawaiian lands. Time and time again, the US military has proven themselves to be unfit tenants of Hawaiian lands. Some examples of the unacceptable actions that have occurred during the military's time on the Hawaiian islands include the recurring fuel leaks at Red Hill, the toxic contamination, including harmful levels of depleted uranium, in the Pohakuloa Training Area and Bradshaw Army Airfield which are home to a number of endangered species, and the decimation of Kaho‘olawe, including its water table, due to repeated bombing. These examples are by no means a comprehensive record of the many pains inflicted upon the land, sea, animals, and peoples of Hawai‘i during the US military's nearly 60-year occupation via its leases. I support the sentiment expressed by the majority of the attendants at the public meetings held on O‘ahu from July 9-11, 2024 – it is unacceptable for the US Army to continue to remain at Kahuku Training Area, Makua Military Reservation, and Kawaihoa-Poamoho Training Area. Rather than strategizing how to retain these lands, the US Army should begin to consider how it will address the restoration of these ceded lands so that they can be returned to the rightful land stewards - the Kanaka	<p>The EIS addresses a range of alternatives for land retention, from retaining all the State-owned land under Alternative 1 to retaining none of it under the No Action Alternative.</p> <p>The Proposed Action is compliant with conducting military training operations in accordance with Army Regulation Field Manual 27-10. The remainder of the regulations cited in the comment do not apply to the Proposed Action.</p>

Commenter	Submitted By	Comment	Response
		<p>Maoli people. Lastly, the US Army should consider whether or not its actions are in compliance with the Army National Guard's military duty of establishing a military government in accordance with the Law of Armed Conflict—international humanitarian law, U.S. Department of Defense Directive 5100.01, and Army Regulations—FM 27-5 and FM 27-10. More information about this obligation can be found in the letter from the Head of the Royal Commission of Inquiry dated August 6, 2024 available as the attached PDF as well as at this link as <a href="https://hawaiiankingdom.org/pdf/RCI_Ltr_to_Army_Commanders_(8.6.24).pdf">https://hawaiiankingdom.org/pdf/RCI_Ltr_to_Army_Commanders_(8.6.24).pdf</a></p>	
Ben Shafer		<p>Aloha mai kakou. My name is Ben Shafer from Kahana. You know, even though everything is pointed in your direction, just know that it's not you personally, but that long history that has been going on for the last 150 years. I am a U.S. Air Force veteran. My dad, stepdad, Air Force veterans of the army, and my grandfathers are both Navy veterans. So we come from a long line of veterans. Even before that, we were veterans of different -- in our own stuffs. But anyway, but we love the military. What we do not like is when they go to places and they end up destroying everything. They went to Vietnam. They went -- they went all -- every place they went to, they destroyed. There is no place that they built up, right? They did not do -- so if you look back at our record over here in Hawaii, Kaho'olawe, what happened to Kaho'olawe? Did they clean it? No. Still -- still all that opala is still on there. When are they going to clean it? They're not going to clean it. Kanaka family in Waiahole, they borrowed the land. They said they were going to promise, they were going to clean it before they left. Did they clean it? No. Still polluted. They have a history -- Red Hill, that's gonna be one a long time before that gets cleaned out -- a long history of polluting things and do not clean it up. Now, what do you thinks gonna happen with these three places here? Are they gonna clean it up when they're done? I don't think so. The record is already there. You already set the record already. So may I propose instead, well, besides being the largest polluter, besides being the</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>largest destroyer of world peace throughout the whole world, for the military industrial complex, may I propose instead that the Department of Defense should be banned and instead the Department of Peace should come forward? The DOD has a record -- has a terrible record of killing, destroying, and even our military men and women know that. Yeah. But anyway, I just wanted to bring that up to you folks. The people that have spoken tonight, you could write doctorate's degree out of that. They were so intelligent. There is -- every way which way you look, they got you beat, every single way. Thank you.</p>	
Diane Leilani Shaw		<p>This seems just like a show to have people's written and in person testimony and objection to renewing leases. If there is no plan of the USA ever giving the land that has since been poisoned back why toy with people. Money and power rule your world but the sacred lands run the world of all who want the land to go back to the people. There is No benefit to the Hawaiian people for the USA to continue to be on the land.                      Diane leilani Shaw</p>	Please see General Response.
Noel Shaw		<p>Aloha,                      I write these comments to you on the last kū moon of the Hawaiian lunar cycle for this anahulu and with my whole chest backed by generations of people who've called Hawai'i home, alongside generations who call it home now, and looking forward to generations of people who will be able to call it home if we hold the line against its continued desecration. I demand that the Army not seek to renew the lease to 6,322 acres of lands on the island of O'ahu and instead focus on using this time to clean up and prepare to leave.                      The Army has been unjustly enriched by their time in Hawai'i especially on Oahu where the Army controls almost 13% of the lands here. It has failed to care for the resources it was entrusted at extremely nominal cost and has caused irreparable damage to them. The environmental, economic, social, emotional, and spiritual construct of Hawai'i has been blatantly disrupted by the Army's practices. Native Hawaiian floral and fauna, cultural sites, natural</p>	Please see General Response.

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		<p>landscapes and resources- all of which are connected to our food systems and systems of wellness- have been polluted by the Army's culture of destruction, domination, and without any understanding of what it means to live on islands in the middle of the ocean. When Army personnel leave the confines of their bases to participate in civilian life, they continue these practices made evident in the most recent report of a missing 19 year old pregnant Army wife. They do not keep us safe nor do they serve as neighbors who are interested in acculturating to the lifestyle that Hawai'i demands for making survival possible here.</p> <p>Further, the Army has failed to take accountability for its actions and hold accountable other branches of the military it serves alongside. Accountability has only come at the cost of the community pushing the Army to uphold lease terms and community members occupying spaces to regain cultural and subsistence access as protected by law.</p> <p>When the US Navy poisoned our water systems here on Oahu, and Army personnel got sick, the Army didn't urge the Navy to downscale their personnel or close their many golf courses to preserve water. The Army's failure to self-assess and self-regulate shows no promise in their ability to make the drastic changes necessary for them to do right by Hawai'i. As a member of the U.S. military who is the biggest green house emitter in the world, the Army cannot in good faith claim to be committed to doing better without returning lands and removing itself from imperialist agendas like the genocide happening in Palestine.</p> <p>These lands are supposed to be held in trust for the benefit of the people, and instead the Army has paid little to use them and has polluted them almost to none use in some space. They've further so drastically disrupted life in Hawai'i that we will have to do years of work to restore our communities of care and trust and sustainability. We desperately need the lands it occupies to be able to grow food again and to house our people.</p> <p>It is best if the Army bow out now- being sure to assume every expense necessary to restore the damage its caused.</p>	

Commenter	Submitted By	Comment	Response
		<p>A hiki ke aloha aina hope loa.                      Noel Shaw</p>	
Kimberly Shay		<p>I object to the proposed retention of approximately 6,322 acres of State-owned lands by the U.S. army at KTA, Poamoho, and MMR on the island of O’ahu. There are very serious concerns over the ecological and resource mismanagement of these lands, and much of the local community as well as scientists, health authorities, and citizens throughout the united states continue to demand that these concerns be handled swiftly by third party land stewardship and conservation groups unaffiliated with the US military. The state has a moral and legal obligation to interfere with and properly repair the damage the US army has caused and plans to continue enacting.</p> <p>It is clear that the army does not have the motivation, internal obligation, ongoing oversight, or skillset to properly manage these lands to preserve the safety of citizens living around these lands and the pivotal environmental resources upon which the entire Hawaiian ecosystem relies on. Hawaii will not remain inhabitable or stable for current and future generations with these crucial lands continuing to be mishandled by the army. It is overtly irresponsible arrogance on the part of the US military to believe that their continued actions on the island of O'ahu will not have devastating consequences for everyone, including themselves. This is direct human endangerment and selfish unchecked corruption at work. State officials of conscience have a duty to do as much as they can in service of the citizens affected by these damages who are raising these concerns.</p>	Please see General Response.
Kauwila Sheldon		<p>Aloha again.· I just want you to thank for those that are wearing the palule moku e three days in a row.· Mahalo for wearing them.· Yeah, you.· Okay. O wau o Kauwila Sheldon. Noho mai Ka’a’awa, Ko’olauloa. I found -- I just wanted to begin starting with Poamoho Stream, the kanawai, because water is divine.· The wai is divine.· Right?· Because we really need it. And we, as Kanaka Maoli, we value wai more than the -- than this.· Right?· The kala.· Because we understand the essence of wai and its divinity. Next thing I want</p>	<p>Section 2.5 of the Final EIS has been revised to state the No Action Alternative is identified as the preferred alternative for Poamoho (i.e., the State-owned land at Poamoho would not be retained). Section 2.3.3.1 has been revised to clarify that airspace use is independent of land retention, and aviation training would continue over land not retained.</p>



Commenter	Submitted By	Comment	Response
		<p>you to point out is, according to the <u>Kaiaka Bay watershed base plan</u>, there is a recent slope movement in the <u>Poamoho Stream canyons</u>, training that can affect these trails in the way the stream should flow properly. So with the training, the military training in <u>Poamoho</u> -- please remember that specifically I -- tonight is about Poamoho for me, because I did my testimony for Makua Valley, and I already did my testimony for Kahuku training area. Right? So I just want you to express that when you guys train near the Poamoho Stream, a lot of things can happen because of the slope degradation. And I want you to point out that those white signs behind there, where you guys say that you guys do this and that, I feel like it was a joke. I feel like -- I was looking at that, and I was like, "That's not what you guys do. That's not what you really do. Come on." And I found an article dated November 6, 1999, or it was more like a blog, about the trail clearers that would hike up Poamoho Trail. And they went to rebuild the Kline Memorial up there. And their people have a Sierra Club history. I'm going to wrap it up pretty soon. They describe the wind being strong and described the invasive species there, lots of invasive species that they had to cut -- cut down. And they assumed that that -- those invasive species came from the military. Another thing. The continued training and combat training and on foot could cause further harm to those beautiful invasive species up there, which consists of ohia lehua, ahakea, ko piko, ala'a, a'ka'awa, ko li'i, alani and Naupaka. And this is the Naupaka that -- the mountain Naupaka. Yeah? Please protect the native species. <u>Our rights, as gatherers, hunters, and who are 'aina, who are trying to get rid of these invasive species, and that are trying to get our land back, and our beautiful flowers back and plants back and medicine back.</u> And with you occupying over there, it -- it creates a very uncomfortable and unsafe space. So, US military, you guys got to get -- step in. E ha'alele 'oukou, e 'olu'olu.</p>	<p>Water resources impacts and invasive species are discussed in Sections 3.10 and 3.3, respectively. Recreational uses of land are discussed in Section 3.2.</p>
Kawila Sheldon		<p>Aloha. Aloha kakou. My name is Kawila Sheldon. And I got to talk real fast because I got to talk about a hundred years of -- of ruins within three minutes. Oh, my goodness. But, yeah, I am from</p>	<p>Please see General Response.</p>

Commenter	Submitted By	Comment	Response
		<p>koolauloa, but I have -- I mean, I have aloha for Makua Valley. My personal experience at Makua Valley in 2009, a friend and I went to the valley to do community work. When we signed our waivers it said things like your entire reservation is dangerous and -- and unsafe due to the presence of surface and substance, unexploded ordnances in bold letters and capital letters. Says that, like, says that in capital letters. Now, before I go further, I'd like to thank the Waianae community and I'd also like thank Malama Makua, Uncle Sparky, Auntie Leandra, bless her in heaven, and Auntie Lynette Cruze and other kupuna in the Waianae community that has took it -- taken care of Makua Valley and -- and taken space there. Okay? . . . While we walked from site to site, we came across a spring that was said to have ona water, which is divine to our people. There was also archeological sites that made connections to my friend and I. We were also followed by scary military men with a beret -- with berets and really big and strong. I remember one wearing a beret looking like Navy SEALs. . . . It makes me sad that something so sacred, so beautiful, has been blown up to pieces. It also makes me sad that the U.S. Military failed to pay for the continuing cleanup for Kaho'olawe as well. And although there has been efforts to clean up Makua Valley, is not all clean. It only reports halfway clean. . . . They're -- and they are favoring a -- lease, 65-year lease renewal to continue training. Various articles from Civil Beat have statements, like, things like Army says Makua Valley no longer needed for live firing. Well, if you guys are going to do foot military strategies there, then you're bringing in the fungi. You're bringing in invasives. You're bringing in things on your clothes. . . . One more thought. One more thought. Continue training in combat on foot could cause further harm to the native species. The articles that I have read about Makua Valley, documentation where people were dispossessed and kicked out of the land, and the videos. The Makua Military Reservation includes three valleys, Makua, Kahanahaiki, and Ko'iahi which are a home of -- for over 40 endangered and threatened species. . . . A legal document dated November 30th, 2023, Makua versus Lloyd Austin III, and mahalo</p>	

Commenter	Submitted By	Comment	Response
		<p>for Earthjustice for putting that on their website. Defendants acknowledge three things for you guys to clean up, the UXOs. We cannot clean up the UXOs. I think you guys should be cleaning up the UXOs, and then we can -- we can oversight that. . . . Renewing a lease without cleaning up shows irresponsibility, mistrust, and disrespect. It is easy to make a mess and challenging to clean up. The military here has -- is like little trojan. No can clean up and cannot, therefore, to mitigate further damage and destruction they make all these excuses. I suggest that the U.S. training should include learning how to clear UXOs and any ordnances left at these sites. . . . Peace should be the ultimate goal for the U.S. Military instead of looking for trouble, looking for wars. Peace needs to be established here. And mahalo for showing up. Your, you know, your bosses actually are the ones that should be here, you know, the ones that make the decision. And you got to take this heat but know that we all aloha aina and I hope that you feel that love and that reverence and that respect. Mahalo.</p>	
Kawila Sheldon		<p>Aloha. Yes, I was -- I came last night, so, yeah, and then coming tomorrow night, too. O wau o Kawila Sheldon, o Kahuku ku'u 'āina hānau, o Ka'a'awa ku'u 'āina hānai. . Okay. I'm gonna skip all that part because only got three minutes. Let's start with 1893 and the events leading up to the overthrow. Not only did the U.S. military assist in taking over Hawaii, but their military high officers also plotted to gain control of Pearl Harbor. Okay. And then -- and that's history that we all know and probably will repeatafter this. <u>The amount of ordnances that the U.S. military have accumulated has not been properly removed or hasn't been cleaned up from 1949 to present and has left my ohana and community in unsafe, unhealthy living conditions. My hanai father was young when he found unexploited ordnances and collected them from the mountains. Some of these ordnances may have come from the Pacific Jungle Combat Training area, which included Green Valley Jungle Training Camp.</u> Notice how the military replaced ahupua'a, our traditional names, to fit their war machine agenda. My dad was curious and cut one of the grenades</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>open, leaving him -- leaving -- it exploded, and leaving him deaf and chemicals going into his skin, which he suffered for a long time. He also later worked on Kwajalein, which was a testing -- which is and still is a testing site for-- a nuclear -- a ballistic missile defense test site and where the native women there gave birth to jellyfish babies.</p>	
Kawila Sheldon		<p>In a pamphlet PDF about the Kahuku site, it states that Kahuku is the largest continuous ground-maneuver training area of the island, which includes, from north to south, portions of Waimea, Pupukeya - almost done -- Paumalu, Kaunala, Waiale'e, Pahipahi'alu, Opana, Kawela, Hanaka'oe, Oio, Ulupehupehu, Punalau, Kahuku, Ka'ena, Malaekahana, La'ie, and Kaipapa'u. The wildlife that sustains life in these areas that we hardly see anymore is Pueo and the 'ōpe'ape'a . And the stories of Kane and Kanaloa is the mo'olelo that we want to preserve there. And the areas that you train in is, like, areas where we want to gather with -- mahalo nui loa for being so patient. And the last thought that I'm going to close in for this is that the -- the fallacy that the U.S. Army is a major player in conservation, that's a fallacy. That's false. A 2001 final report by the army claims that their goal is to minimize training impacts and so-called major players in conservation. But they didn't even -- they only cleaned up half of it, and there is still ordnances throughout Ko'olau Loa. Mahalo.</p>	<p>Protected species at Kahuku are discussed and analyzed in Section 3.3.5.1. The Cultural Impact Assessment, Appendix B of the EIS, includes mo'olelo of the subject lands of the Proposed Action.</p> <p>Section 3.6.1 and Appendix J has been revised to add the definition of operational ranges. Current management measures to mitigate potential impacts from hazardous substances and hazardous wastes are discussed in Section 3.6.5.</p>
Kaylene Kauwila Sheldon		<p>Aloha kākou:                  'O au Kaylene Kauwila Sheldon. 'O Kahuku ku'u 'āina hānau. 'O Ka'a'awa ku'u 'āina hānai. 'O Kanehoalani ko'u mauna. 'O Kalae'o'io ko'u kai/wai. My name is Kaylene Kauwila Sheldon. Kahuku is my birthplace. Ka'a'awa is the land that fed and raised me. Kanehoalani is my mountain. Kalae'o'io is the water that nourishes me. I am in opposition to the U.S. military occupation of the 6,322 acres of stolen Hawaiian Kingdom lands. I am writing a separate letter for the three sites that the army desires to occupy because each site has a mo'olelo and a unique background that needs to be respected and will be presented at each site, "Kahuku Training Area" (that is a combination of at least 15 ahupu'a), Makua Valley, and Poamoho.</p>	<p>Please see General Response.</p>

Commenter	Submitted By	Comment	Response
		<p>I am from Ko‘olauloa, and Kahuku is near to my pu‘uwai (heart). There are at least five talking points that I will clearly articulate in this commentary text. The first talking point is that the military, in my experience, has left so much pain, suffering, ‘ōpala (rubbish) that it is hard to see the U.S. military as a responsible steward. I know the military as a very destructive, belligerent, irresponsible and severe threat. Why do I feel so fearful?</p>	
<p>Kaylene Kauwila Sheldon</p>		<p>A. Let's start with 1893, in the events leading up to the overthrow, not only did the U.S. military assist in taking over Hawai‘i, but their military high officers also plotted to gain control of Pearl Harbor. We can see evidence of Pearl Harbor as oozing sewage in the year 2024, while in the 1800’s and before, Pearl Harbor consisted of a rich oyster habitat and a healthy ecosystem. My ancestor Keaunui was the head of the ‘Ewa chiefs, he contributed to the engineering of the river ways, fishponds, and navigational systems of Pu‘uloa. The manō, which some were specific aumakua to many of the ohana in that area, were hunted down later by military officials because some of these areas were their home and eating grounds; they were hunted down because they had destroyed some of the constructive areas that the military were building at the time. It was known that because the ali‘i and their villages had a relationship with the manō they were not man-eating sharks but protectors (Lee, Michael Kumukauoha, 2015). Today, these spaces are no longer homes for some of our marine life. Today, Pearl Harbor is gated, with many signs indicating that you are not allowed to go fishing. “In 1998, the State of Hawaii Department of Health issued a health advisory stating that fish and shellfish from Pearl Harbor should not be eaten because the fish and shellfish may contain chemicals that can be hazardous based on the animals' uptake of pollutants and contaminants,” (from a Joint Base Report 5510.4 B dated June 7, 2023). Other places of destruction and leaving ‘ōpala where we, as indigenous peoples, Nā Kanaka Maoli ‘Ōiwi Hawai‘i, lived, fished, or gathered was Kaho‘olawe, Pohakuloa, Makua Valley, and all alongside from Waikane to Kahuku.</p>	<p>Please see General Response.</p>

Commenter	Submitted By	Comment	Response
Kaylene Kauwila Sheldon		<p>B. The amount of ordinances that the U.S. military have accumulated has not been properly removed or has been cleaned up from 1949 to present and has left my family and community in unsafe, unhealthy living conditions. My hānai father was young when he found unexploded ordinances and collected them from the mountains. Some of these ordinances may have come from the “Pacific Jungle Combat Training Center” which included Green Valley Jungle Training Camp. (Notice how the military replaced ahupua‘a traditional names to fit their war machine agenda). My dad was curious and cut one of the grenades open, leaving a deaf pause and a shock wave and metals to go into his skin. The doctors said he might become sterile. He wasn’t sterile, but he died at the age of 54 from heart failure. It left him in internal pain. Unfortunately, my dad wasn’t the only one who found ordinances; in 1993, a young man found a 2.36-inch bazooka, a portion of an expended 105 mm AP projectile, and .30 caliber bullets (from DERP-FUDS Inventory Project Report), and the mother told the U.S military that her son frequently found ordinances. In addition to this story, my dad and many Kanaka Maoli ‘Ōiwi Hawai‘i men were asked to work in Kwajalein as construction workers, where there was a testing site. My dad and his friends ate the fish they caught surrounding the island, thinking it was safe like the other indigenous/Native peoples there. Today, the Kwajalein atolls is used as a Ballistic Missile Defense Test Site. The history of jellyfish babies and the US Nuclear Testing in the Marshall Islands has shown reproductive toxicity in toxic environments. Kaho‘olawe has been detrimental as well in a contaminated environment. I can only assume that the fishing grounds where my parents ate their fish in the 70s were toxic if they came from the Kwajalein area.</p>	Please see General Response.
Kaylene Kauwila Sheldon		<p>Speaking of poisonous environments in a “Final Preliminary Assessment of PFA’s “(Polyfluoroalkyl Substances) it states that “The Army says the Kahuku Training Area warrants no further action regarding the use of PFAS although <u>reading through the narrative suggests the use of PFAS in the wash rack and the firefighting foams, the carcinogens are often used in wash racks on</u></p>	Section 3.6.5 has been revised to discuss the purpose and conclusions of the Army Preliminary Assessment/Site Inspection (PA/SI), and explain that no further PFAS investigations at these installations were warranted.

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		<p><u>bases,”</u> (Elder, Pat 2023). This story of the ‘ōpala that the military has left is only one out of a hundred stories that continue to decay human health, ruin indigenous reproductive systems, separate and disconnect Kanaka from their sources, contaminate precious drinking water, pollute and destroy healthy ecosystems, destruction of sacred sites, and disrupt indigenous ways of life.</p>	
<p>Kaylene Kauwila Sheldon</p>		<p>C. In a pamphlet PDF about the Kahuku site, it states that Kahuku is the “largest” continuous ground-maneuver training area of the island, which includes, from north to south, portions of Waimea, Pūpūkea, Paumalū, Kaunala, Waiale`e, Pahipahi`ālua, `Ōpana, Kawela, Hanaka`oe, `Ōio, Ulupehupehu, Punalau, Kahuku, Ka`ena, Mālaekahana, Lā`ie, and Kaipapa`u. The wildlife that sustains life in these areas that we hardly see anymore is the pueo (Hawaiian owl) and `ōpe`ape`a (Hawaiian Bat). There are mo`olelo, genealogical references, heiau, and essential natural resources in each ahupua`a. There are mo`olelo, genealogical references, heiau, and essential natural resources in each ahupua`a. One of these stories is about the travels of Kane and Kanaloa as told in Hawaiian language newspapers, the areas that they travel throughout these places in Ko`olauloa. These stories have proven to indicate significant springs and water sources that were contaminated by many factors, one of them being the U.S. military occupation. Water being the source of our nourishment and deeply respected and valued is something the military has not respected, as we have seen with Red Hill, Kapūkakī. Another important story about Kahuku is the story of Maui’s fishhook and his adventures which links many people of Moananuiākea and is part of their genealogical ties. This story shows the importance of wai, the `alae ula, and the wildlife.</p>	<p>Please see General Response.</p>
<p>Kaylene Kauwila Sheldon</p>		<p>D. The fallacy that the U.S. army is a “major player in conservation.” A 2001 final report by the army claims that their goal was to “minimize training impacts” and were so-called, “major players in conservation,” the track record of the U.S. army’s clean ups have failed miserably. A report done by McNeely (2006) mentions the <u>accidental spread of invasive plant species through military equipment, species of grasses, or fungi on clothing and shoes.</u> For</p>	<p>In consultation with USFWS the Army has developed and implements extensive protected and invasive species programs. The Army's efforts to manage protected species and manage invasive species are generally described in Section 3.3.5, and for respective training areas in Sections 3.3.5.1, 3.3.5.2, and 3.3.5.3.</p>

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		<p>example, the melochia umbellata is incipient and is “likely introduced via military training” (1.32 KTA, Oct 2010-Sept 2015). The report also mentions the scientific name Lasiurus cinereus semotus, which is known as the Hawaiian Hoary bat to be endangered and the Tetraplasandra gymnocarpa known as the Ko‘olau Range ‘Ohe to be endangered</p>	
<p>Kaylene Kauwila Sheldon</p>		<p>E. The rural area of Kahuku is already surrounded by massive wind turbines, and the military training facility is a double threat to the community's health and the water birds that live in the wetlands. Is not a healthy ecosystem to have a US Army military training facility in the area where there are streams, springs, and wells, both man-made and natural, due to residential living, agriculture and wildlife it would not be appropriate for the U.S military presence to be training in the facility. Native plant restoration and other native species is crucial for this site. The best antidote right now for this site is the military to stop the training, stop renewing leases, clean up and dissolve its U.S. occupation in Hawai‘i and throughout Moananuiākea. One day it will be a dream come true for kanaka to return to these lands and work toward plant restoration and towards ‘ōpe‘ape‘a recovery. May the military listen to the voices of our ancestors and right the wrongs they have done. Na‘u, Kaylene Kauwila Sheldon</p>	<p>Please see General Response.</p>
<p>Kaylene Sheldon</p>		<p>To: U.S Army Garrison-Hawai‘i, Public Affairs Office                      To: Oahu ATR Draft EIS                      Attn: Public Comments on the Draft EIS For Makua Valley Training Area                      July 9, 2024                      Aloha kākou:                      ‘O au Kaylene Kauwila Sheldon. ‘O Kahuku ku‘u ‘āina hānau. ‘O Ka‘a‘awa ku‘u ‘āina hānai. ‘O Kanehoalani ko‘u mauna. ‘O Kalae‘o‘io ko‘u kai/wai. My name is Kaylene Kauwila Sheldon. Kahuku is my birthplace. Ka‘a‘awa is the land that fed and raised me. Kanehoalani is my mountain. Kalae‘o‘io is the water that nourishes me. I am in opposition to the U.S. military occupation of the 6,322 acres of stolen Hawaiian Kingdom lands. I am writing a separate letter for</p>	<p>Please see General Response.</p>



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		<p>the three sites that the army desires to occupy because each site has a mo’olelo and a unique background that needs to be respected and will be presented at each site, Kahuku Training Area, Makua Valley, and Poamoho.</p> <p>I am from Ko’olauloa, and Makua Valley has always been a special place near my pu’uwai (heart). There are at least five talking points that I will clearly articulate in this commentary text. The first talking point is the destruction of Kaho’olawe, my personal experience in Makua Valley, the third is the potential damage and danger for our Native species, the forth point is dispossession and more destruction and the last point is about how the U.S military fails to show proper stewardship.</p> <p>A. Let’s start with the bombing of Kaho’olawe that started approximately in 1941; just a brief reminder of the long and abusive relationship the U.S military (whom is the abuser, user and perpetrator) has had with their interactions and engagement in Hawai’i. The victim in this case of course is Hawai’i. It infuriates me that the U.S behaves very obnoxiously when occupying space, lands, waters, ocean in Hawai’i. The U.S acts as they are entitled to Hawai’i. You don’t deserve to occupy Hawai’i because your track record has not shown any pono stewardship at all. For example in 1965-Kaho’olawe’s ground water was destroyed when an atomic blast went off signaling a 500 tons of TNT. In 1967, Kaho’olawe is used as a target airfield. Some of the bombs are aimed and lands in hono o Pi’ilani, Maui (Doulton-Lee Ho, 2024) 1976-Is when the PKO, Protect Kahoolawe starts to mobilize to take the U.S to court and protest against the military. However it is not until 1993 after a long 15 year resistance or longer that finally Senator Inouye supports Title X which transfers the island back to the State. That is a total of 52 years of bombing Kaho’olawe with no consciousness that the island is a living being. Within those 52 years did the United States military ever think about peace?</p> <p>The U.S Military doesn’t need any more training or target practice here in Hawai’i.</p> <p>B. At first I thought that the U.S military had occupied Kaho’olawe</p>	

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		<p>longer than Makua Valley, not true...according to Kelly and Aleck (1997), "U.S military use of Mākua Valley dates from the 1920s when it first acquired three parcels in the upper floor of the valley for howitzer emplacements" (p.p 8). People that had lived on the land were kicked out by the U.S military. There were important sites that were destroyed like a fishing hole, a fresh water wells and the U.S military dumped their waste into the water wells. The U.S military bombed the valley and Navy battleships were target practicing and using amphibious vehicles that destroy the reefs. It was said that churches and gravesites were bombed. To think about leasing Makua Valley to the U.S is like death to our people.</p> <p>My personal experience at Makua Valley. In 2009, a friend and I went to the valley to do a clean up and cultural site education. When we signed our waivers it said things like,                  THE ENTIRE RESERVATION IS DANGEROUS AND UNSAFE DUE TO THE PRESENCE OF SURFACE AND SUBSURFACE UNEXPLODED ORDNANCE; that there may be hazardous conditions and ordnance on and under the ground surface of the Reservation; and that unexploded ordnance may explode nearby causing seriously bodily harm, injury and/or death. I fully understand, and by my signature acknowledge that I understand, that the roads and trails on the Reservation are extremely rough and rugged. I fully understand, and by my signature acknowledge that I understand, that if I utilize any of these roads or trails, I MAY BE INJURED/KILLED. Knowing that the Reservation is dangerous and unsafe and that the pervasive presence of unexploded explosives presents A RISK OF SERIOUS BODILY HARM OR DEATH to me, I nevertheless desire to go on the Reservation (From Mālama Makua website, 2024) Link to Malama Makua</p> <p>While we walked from site to site, we came across a spring that was said to have ono water, wai which is divine to our people. There was also archaeological sites that made connections to my friend and I. We were also followed by scary military men, I remember one wearing a beret looking like Navy seals. It makes me sad that something so sacred, so beautiful has been blown up to pieces. It</p>	

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		<p>also makes me sad that the U.S military failed in paying for the continuing clean up for Kaho’olawe and, although it has made efforts to clean up Makua Valley, they are favoring a 65-year lease renewal to continue training. Various articles from Civil Beat have statements that say things like "Army says Makua Valley No Longer Needed For Live Firing."</p>	
Kaylene Sheldon		<p>C. Continued training in combat training, and on foot could cause further harm to Native species such as foreign fungi or invasive seedlings attaching themselves to tires, clothing and objects that are brought in to the valley. Helicopter and controlled airspace may bring anxiety and fear to the community and is a threat to the Native species and fauna such as the Koli’i, ‘Ape’ape, Koa, Ala’a, Kanawao, Pinao, Kamehameha and Koa butterflies, Elepaio and much more.</p>	<p>The Army works diligently to minimize the spread of and to control invasives species. USARHAW enforces the “Washrack Utilization Policy to Control Invasive Species” to ensure decontamination and bio-sanitation for personnel and equipment entering and exiting training areas. The USAG-HI Environmental Division provides soldiers with education on decontamination procedures, supplemented by posted signage in training areas identifying restricted zones impacted by invasive species.</p> <p>These efforts are generally described in Section 3.3.5, and for respective training areas in Sections 3.3.5.1, Table 3-13, 3.3.5.2, 3.3.5.3, and Table 3-21.</p> <p>Additional noise studies that address impacts on native and protected species have been included in Section 3.3.5 and 3.8.5 of the Final EIS.</p>
Kaylene Sheldon		<p>D. The articles that I have read about Makua Valley where people were dispossessed and kicked out of the land and the videos that I watched of the continued presence of the U.S military leaves a very rotten taste. As long as you occupy and train here in Hawai’i, we will never see a clean and safe Hawai’i. The very people that you say you protect are the very people that you are harming. From 2004 to 2024, without a shooting, live fire is not what you call continued responsible stewardship if you renew the lease to train and not clean up any ordinances, it is not pono stewardship.</p>	<p>Please see General Response.</p>

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Kaylene Sheldon		<p>Mākua Military Reservation includes three valleys — Mākua, Kahanahāiki, and Ko'iahi — which are home to over 40 endangered and threatened species and dozens of sacred and cultural sites, including heiau (Hawaiian temples), burials, and petroglyphs. <u>Decades of live-fire training sparked wildfires that have destroyed native forest habitat, killing imperiled plants and animals.</u> Bullets have pockmarked sacred sites, and countless other sites have been destroyed by aerial bombardment, ship-to-shore shelling, artillery rounds, mortars, and rockets. (From Earthjustice 2023)</p>	<p>Please see EIS Section 3.4.5 for a discussion of impacts from wildfires and training activities and existing mitigation measures to protect historic and cultural resources.</p>
Kaylene Sheldon		<p>Mākua Military Reservation includes three valleys — Mākua, Kahanahāiki, and Ko'iahi — which are home to over 40 endangered and threatened species and dozens of sacred and cultural sites, including heiau (Hawaiian temples), burials, and petroglyphs. Decades of live-fire training sparked wildfires that have destroyed native forest habitat, killing imperiled plants and animals. <u>Bullets have pockmarked sacred sites, and countless other sites have been destroyed by aerial bombardment, ship-to-shore shelling, artillery rounds, mortars, and rockets.</u> (From Earthjustice 2023)</p>	<p>Please see EIS Section 3.4.5 for a discussion of impacts from wildfires and training activities and existing mitigation measures to protect historic and cultural resources including sacred sites.</p>
Kaylene Sheldon		<p>E. A legal document dated November 30th, 2023, Makua vs. Lloyd J. Austin III, Secretary of State and Christine Wormuth, Secretary of the United States Army ask the court to order five things, here I have #4, #5, #6: #4. Defendants acknowledge that, to date, the Army has cleared only half of the twenty-two (22) sites that it identified in 2009 as "high priority" for UXO clearance "with a focus on increasing access to cultural sites." ECF 204-3. The eleven (11) cleared sites are Sites 4536, 4542, 6505, 6506, 6508, 6593, 6596, 6597, 6603, 6613, and 6621. The eleven (11) "high priority" sites that remain to be cleared of UXO include the "Blue Trail" Sites (Sites 4627, 4628, 4629, 4630, 5920, and 9523) and sites located within a designated improved conventional munitions area (Sites 4540, 5587, 5588, 5589, and 5590). #5. Defendants reaffirm the Army's obligation "to use good faith efforts to develop a plan and secure funding for clearing UXO from [all twenty-two identified] 'high priority' sites," ECF 188 at 2, including contingency plans to clear UXO in the future from high priority sites for which UXO clearance is</p>	<p>The Blue Trail is not on State-owned land. After resuming consultation with Malama Makua in March 2024, the Army's Explosive Ordnance Disposal unit conducted an inspection in June 2024 and verified that the Blue Trail remains a high risk due to the presence of UXO and because of the steep terrain and vegetation. The Army has professional and trained personnel highly experienced in removing UXO.</p>

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		<p>not currently "reasonable and practicable." Id. at 29. #6. In furtherance of that obligation, the Army will promptly resume the consultation with Mālama Mākua over clearance of UXO from the "Blue Trail" sites (Sites 4627, 4628, 4629, 4630, 5920, and 9523) that began in 2016 but was not completed. Renewing a lease without cleaning up shows irresponsibility, mistrust, and disrespect. It is easy to make a mess and challenging to clean up. The military here is like little children therefore to mitigate further damage and destruction, I suggest that the U.S training should include learning how to clear UXOs and any ordinances left at the sites. Peace should be the ultimate goal for the U.S military instead of looking for trouble in wars. I strongly oppose this 65 year lease now and forever.</p>	
Kaylene Sheldon		<p>To: U.S Army Garrison-Hawai'i, Public Affairs Office Attn: Public Comments on the Draft EIS For Poamoho Training Area July 11, 2024 Aloha kākou: 'O au Kaylene Kauwila Sheldon. 'O Kahuku ku'ū 'āina hānau. 'O Ka'a'awa ku'ū 'āina hānai. 'O Kanehoalani ko'ū mauna. 'O Kalae'o'io ko'ū kai/wai. My name is Kaylene Kauwila Sheldon. Kahuku is my birthplace. Ka'a'awa is the land that fed and raised me. Kanehoalani is my mountain. Kalae'o'io is the water that nourishes me. I am in opposition to the U.S. military occupation of the 6,322 acres of stolen Hawaiian Kingdom lands. I am writing a separate letter for the three sites that the army desires to occupy because each site has a mo'olelo and a unique background that needs to be respected and will be presented at each site, Kahuku Training Area, Makua Valley, and Poamoho. I am from Ko'olauloa, and I am very interested in protecting the native species and our gathering rights to Poamoho. A. Let's start with the Poamoho stream. According to the Kaiaka Bay water shed base plan, there is recent slope movements in the Poamoho stream canyons, training can affect these trails and the way the stream should flow properly. B. I found a article dated November 6, 1999, or it was more like a blog about trail clearers that would hike up Poamoho Trail and they went to rebuild the Cline Memorial and these people have a Sierra Club history there. They described the wind being strong and</p>	<p>Efforts to control and minimize the spread of invasive species are described in Section 3.3.5. Recreational access is addressed in Section 3.2.5.2. The Army does not use Poamoho for ground-based training and low-level aviation training activities are not dependent on proposed land retention.</p> <p>Additional noise studies that address impacts on native and protected species have been included in Section 3.3.5 and 3.8.5 of the Final EIS.</p>

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		<p>described the invasive species there that they are trying to clear the trails. They come across uluhe which is commonly found in the forest in Hawaii so these hikers indicates that they know what they are doing. Therefore hunters, eco-friendly hikers and gatherers might be impacted by military presence in Poamoho. C. Continued training in combat training, and on foot could cause further harm to Native species such as foreign fungi or invasive seedlings attaching themselves to tires, clothing and objects that are brought in to the valley. Helicopter and controlled airspace may bring anxiety and fear to the community and is a threat to the Native species such as ‘Ōhi‘a lehua, ‘Ahakea, Kōpiko, ‘Āla‘a, Aka‘awa, Koli‘i, Alani, and Naupaka. Please protect the Native species, our rights as gatherers, hunters and hoa ‘āina who are trying to get rid of the invasive species. Na‘u, Kaylene Kauwila Sheldon</p>	
Kaylee Sheller		<p>I STRONGLY OPPOSE the U.S. army retaining ANY of the lands that they have mismanaged for decades. They have proved unfit time and time again and are an active threat to the environment and therefore the wellbeing of the people. All of this land needs to be returned so it can be cared for properly and the mauka to makai stream flow can be restored. The only right thing to do is END THE LEASES. Mahalo.</p>	Please see General Response.
Hannah Shimabukuro		<p>My name is Hannah Shimabukuro, I'm a fourth generation American raised in Hawai'i. My family resides on Oahu and Maui. The 6,332 acres that the military has been leasing should not be renewed in 2029. This land has been abused and poisoned by military use, as seen by the reckless oil spills at Red Hill, and the shameful bombing of Kaho'olawe. As hundreds of families remain displace from the fires in Lahaina, and hundreds of others remain a paycheck away from poverty, Hawai'i can not afford continuing to put money into the military. The military is disastrous to the environment of Hawai'i. Climate change is a severe crisis to all of us, but especially those of us living in the islands. Please think beyond greed. Think of the future of your home, and the future of our children.</p>	Please see General Response.
Allison Shiozaki		<p>Aloha mai kākou. I'm submitting this written statement as a settler in Kānaka 'Ōiwi lands but who stands in deep commitment to lāhui,</p>	Please see General Response.

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		<p>'āina, &amp; wai. The military doesn't. The environmental and social impact of the military on the Ka Pae 'Āina is so harmful; it will take generations to clean up if we start today. So let's start today because we can't change the decades of mistreatment of the land, water, people and beyond human relatives who have been harmed. The military is the world's biggest polluter. It's used DU on those grounds, sacred grounds, and needs to use its vast access to money (the collective's money) to make the place safe and habitable again. One cannot in good conscience allow for an entity who has caused so much harm to be given more access. Lāhui has stated clearly, 'A'ole.</p>	
Keoni Shizuma		<p>Hey. Aloha. I'm Keoni Shizuma, and I do not support the renewing of any of the leases expiring in 2029. Let's start off with some background points. The apology resolution of 1993 -- that's 31 years already -- acknowledges that the overthrow of the Kingdom of Hawaii was illegal. This means that America is occupying land in Hawaii. Hawaii is not legally part of America. . . . . Let's also say that -- so background points, aina means that which feeds you. Our land will feed us if we care for it properly. And wai, you know, that's water, and that'll give us life. And we need water for life. . . . . Okay. As an -- as an illegally occupied entity on our land, you are not protecting us. You're protecting yourself. You are protecting America, not Hawaii. Because as I said, Hawaii is not part of America. Hawaii is being occupied by America. Your presence here makes Hawaii a target for your adversaries. . . . . Again, you're not protecting us. In fact, you are putting us in harm's way. You are -- you, America, are the threat other countries are worried about and may attack, not Hawaii. Your mission is not to protect Hawaii. It is to protect America. But you are putting Hawaii in harm's way. . . . . Prior to America coming here, no country has ever attacked Hawaii. We were recognized as an independent nation by many nations, including British and France -- France, and yet, no one attacked us. The point being that you are not protecting us. You are not doing us any favors. You are just putting us in harm's way. . . . . You are also poisoning our land and our water. And you've proven that</p>	<p>For land not retained the Army would not continue current level of species and habitat protections; however, Section 3.3.4 has an assumption that the State would, "Continue current levels of species and habitat protections."</p> <p>Section 3.10 provides management measures to protect water resources and Section 3.6.5 for discussion on cleanup measures.</p> <p>Section 1.2.1 and 1.2.2 provide and overview of national defense policies and the importance of Hawai'i.</p>

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		<p>you're not good at cleaning up your messes.· Kaho'olawe, Kapukaki, Pearl Harbor, the list goes on.· You claim the EIS -- halfway, good.· Still got -- I'll make it. -- to clean up your mess. But in the DEIS, you provided -- you say that you'll only go up until expenditures will not exceed -- the expenditures will not exceed fair market value of the land.· If you can't clean up the mess, then don't make it.· Just leave.· . . . . Also, it's the -- the draft EIS speaks of conservation efforts that would not occur if the leases are not renewed.· That's a flawed assumption, because conservation is going on all over on our islands.· Wherever we can, there's people out there removing invasives, planting natives, and caring for endangered species. . . . . Last point, real quick, is just that people also state that the financial loss will be big if the military leaves.· But you know what?· We can't eat money, and we can't drink poison.· So we choose to drink and eat from our land over the money.· For those who choose to take the money, you should choose to drink and eat poison elsewhere. · . . . In summary, yeah, I do not support any of the leases being renewed.· Mahalo.</p>	
John & Rita Shockley	Free Access Coalition	<p>The Free Access Coalition opposes the continued "free" lease of Hawaii's lands to the military for a variety of reasons including how the military has managed the leased land and the amount of lease they pay to the State.                      Mahalo for your time.</p>	Please see General Response.
Kohanna Shores		<p>Aloha this is Kohanna Jean Kato Shores.                      I'm born and raised on the island of Oahu. Being from here it is our kuleana to malama aina. Hawai'i used to be a kingdom with their own culture and people. They knew how to survive and properly take care of their home. It is Hawaiians rights to have control and a say on what happens on their own land. No piece of land in Hawai'i should be only occupied by military. Hawaiians shall forever be able to the basic right to go anywhere on their land. If Hawaiian have been begging for years that they want to have a say and control of their own land that was illegally annexed from them. The military government system should obey by their rules on their land. This is a basic right we should be giving all Hawaiian. If majority of</p>	Please see General Response.



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		<p>Hawaiian are saying NO to the kingdom land being used as military bases and homes the government can at the very least respect their wishes.</p>	
Theodore Siedlecki		<p>The leases should not be renewed. The EIS contains a powerful statement: "The No-Action Alternative would have a significant beneficial impact on land use (land tenure) and environmental justice at all sites, and on cultural practices at MMR." It is time to let this land heal.</p>	Please see General Response.
Alexis Sims		<p>August 7, 2024                      To Whom It May Concern:                      I understand that Mākua (782 acres), Poamoho (4,390) and Kahuku (1,150 acres) are currently used by our Army, Marine Corps and Hawaii National Guard; and 100% of the lands are up for renewal in 2029.                      As a citizen of the United States living in Alabama, I recognize that all our systems, including Hawai'i's land, people, and resources, are interconnected. It is from this vantage point that I write in opposition of said lease renewals for the following reasons:                      We have recognized that our activities on Oa'hu have not only hurt the land but caused significant harm. Retention of any lands at Kahuku, Pamoho, and Mākua will only increase these "significant adverse impacts". Our world is warming at an alarming rate leading to the destruction of ecosystems and eventually our extinction as a species. It is imperative we mitigate further damage whenever possible.                      Several trusted organizations on the islands have noted our demonstrated lack of regard, care and accountability regarding the restoration of these lands after use. Kahuku, Pamoho, and Mākua are home to dozens of endangered organisms. Our ecosystems are connected, and we must prioritize the health and wellness of the land, if for no other reason than to preserve our own long-term interests. If the land dies, others will follow and there will be nothing to fight for. The exercises will be moot.                      As defined in the Hawaiian Homes Commission Act, 1920, these lands were to be set aside and held in a public trust for five</p>	Please see General Response.

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		<p>purposes including the betterment of the conditions of native Hawaiians. We need to allow the land to heal. Kānaka Maoli's relationship to the land and their stewardship of it should serve as examples for us moving forward. We should withdraw and allow them to lead.</p> <p>There is no Hawai'i without Kānaka Maoli, and yet they have been increasingly displaced from affordable housing. Renewal of our leases in Kahuku, Pamoho, and Mākua will only amplify and inflame the housing crisis that pushes many off of the island.</p> <p>The DEIS minimizes the long-term implications of our presence on native Hawaiian cultural practices and historic sites. This lack of consideration and foresight will ultimately lead to our own destruction. There is much for us to learn from them. It would behoove us to begin now.</p> <p>If Hawai'i is indeed a state, the wellbeing of its people is our responsibility as the governing body. Our current actions and continued choices only lend credence to the validity of the Hawaiiin Kingdom. This illegal occupation diametrically opposes who we are - a beacon of freedom, home of democracy with liberty and justice for all.</p> <p>Kānaka restoration is vital and inherently connected to the land. As an American, this is disappointing to say the least. To illegally occupy a land, name it as a state, and then not take care of the health, wealth, and continuation of its people feels criminal.</p> <p>Please accept this testimony in strong opposition to the lease renewals on Mākua (782 acres), Poamoho (4,390) and Kahuku (1,150 acres). There is a different way of being. For the sake of humanity, there must be.</p> <p>Sincerely,                      Alexis Sims                      [Kanoa, the freed one]</p>	
Stason Skeen		The United States military presence on the Hawaiian island of O‘ahu has caused significant adverse impacts on the environment, local residents, and Native Hawaiians. The U.S. Army itself has acknowledged that retaining lands at Kahuku, Poamoho, and Makua	Please see General Response.

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		<p>results in "significant adverse impacts" on land use and environmental justice. These areas, rich in biodiversity and cultural significance, suffer degradation that affects the health and well-being of local communities who rely on these lands for their cultural practices and livelihoods. The retention of military lands displaces Native Hawaiians from their ancestral lands, disrupting their cultural and social structures. The military presence restricts access to sacred sites, limits opportunities for traditional farming and fishing, and erodes the cultural heritage central to Native Hawaiian identity. Additionally, these lands were originally Hawaiian Kingdom Crown Lands, taken without consent or compensation following the illegal overthrow of the Hawaiian monarchy in 1893, which highlights the colonial nature of the military's presence.</p>	
Stason Skeen		<p><u>The nominal fee of \$1 that the military pays to retain these lands does not reflect the true cost</u> of the environmental damage, cultural disruption, and socio-economic displacement caused by its presence.</p>	<p>Sections 2.4, 3.1.3, and 3.2, and Appendix G of the Final EIS have been revised to clarify the assumption that a new lease or arrangement for fee simple Federal ownership would be negotiated at no less than an equitable, fair market value with the State. Land retention negotiations, including compensation for use of the State-owned lands, would be initiated following completion of the NEPA/HEPA process.</p>
Stason Skeen		<p>Moreover, the Red Hill fuel leak disaster, where thousands of gallons of fuel contaminated the island's primary aquifer, underscores the reckless and negligent management of military installations. This incident exemplifies the broader risks associated with military operations on environmentally sensitive lands and underscores the urgent need for deoccupation. Addressing these longstanding issues by restoring the lands to their rightful owners, providing fair compensation, and prioritizing the health and well-being of local communities and the environment is imperative. The deoccupation of military lands on O'ahu is not only a matter of justice but also a necessary step towards a more sustainable and equitable future for all residents of Hawai'i</p>	<p>Please see General Response.</p>
Dan Smith		<p>The land should revert to the Hawaiian people.</p>	<p>Please see General Response.</p>

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Haley Smith		<p>As a resident of Hawai'i, an Indigenous woman, a student specializing in Native Hawaiian Health, and the daughter of an Active Duty service member, I write to strongly oppose the proposed action to retain three areas (Kahuku Training Area, Kawaioloa-Poamoho Training Area, and Makua Military Reservation) for military training beyond the end of the current leases. These areas of 'aina encompass up to 6,322 acres of O'ahu's 'aina. 'Aina is meant to be with and for the Hawaiian people, the Kānaka Maoli, not for the U.S. Army, which already controls over 51,000 acres of O'ahu's 'aina. Current land leases and proposed actions like these only contribute to furthering the displacement of Hawaiians, as well as the degradation of Native Hawaiian species and the environment. Since the occupation of Hawaiian lands, militarism has caused extensive damage to the Hawaiian environment, ecosystems, and natural resources.</p> <p>Here are some examples of environmental incidents that have occurred as a result of U.S. Military activities and exercises on O'ahu:</p> <ol style="list-style-type: none"> <li>1.) The Army's live-fire training exercises in Makua Valley since World War II: These activities have caused extensive environmental damage, including wildfires, unexploded ordnance, and pollution.</li> <li>2.) Red Hill Fuel Storage Facility Contamination: The Red Hill Bulk Fuel Storage Facility, built during World War II, consists of 20 large underground fuel storage tanks near Pearl Harbor. Over the decades, multiple fuel leaks have been documented, raising concerns about contamination of the island's primary aquifer, which supplies drinking water to much of O’ahu. In 2021, a significant fuel leak contaminated the drinking water supply for thousands of residents, leading to health issues and widespread concerns about long-term water safety.</li> <li>3.) Kāne’ohe Bay Coral Reef Damage: Military activities, including dredging, construction, and the operation of military vessels, have degraded coral reefs in Kāne’ohe Bay. Coral reefs are vital to the marine ecosystem and the local economy. Damage to these reefs from military activities has had long-term consequences on marine</li> </ol>	Please see General Response.

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		<p>biodiversity and the bay's health.</p> <p>4.) Schofield Barracks and Waste Management: Schofield Barracks, a major Army base on O'ahu, has been associated with pollution issues, including the improper disposal of hazardous waste, leading to contamination in nearby waterways and soil, posing health risks to the surrounding communities.</p> <p>5.) Kahuku Training Area: The Army has used the Kahuku Training Area on the North Shore of O'ahu for a variety of military exercises. The area includes native forests and endangered species habitats. The exercises have led to habitat destruction, invasive species introduction, and other environmental damage, threatening the local ecosystem.</p> <p>6.) Pearl Harbor &amp; Sand Island (Mauliola Ke'ehi): has been a significant naval base for over a century. Various military activities, including ship maintenance, fueling operations, and industrial processes, have led to pollution and contamination of the harbor. Mauliola Ke'ehi used to serve as one of the most abundant and flourishing ahupua'a systems of O'ahu. It was home to many Hawaiian families who were known for caring for that ahupua'a system and all of its life in the reef and ocean. It was abundant with fish ponds, coral, and valuable key Native Hawaiian marine life, such as various species of limu, fish, eels, and more. Due to militarization, especially after the bombing of Pearl Harbor, the Native Hawaiian families of those lands &amp; isles were displaced, and the area was seized by the military &amp; dredged for building runways &amp; facilities. This has permanently destroyed much of the coral reef, polluted the water quality, and has killed and endangered many native marine species, due to the runways and nearby harbor being polluted with heavy metals, petroleum products, and other hazardous substances.</p> <p>These examples highlight only a small portion of ongoing environmental harm associated with military activities on O'ahu. While the military has taken some small steps to address some of these issues, the deplorable legacy of environmental damage caused by military actions continues to be a significant concern. The</p>	

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		<p>U.S. Military should have no claim to land that was stolen, especially under the circumstances of the illegal overthrow of the Hawaiian Kingdom. The leases given to the U.S. Army in control of these lands should cease, and they should never be extended or granted again. Instead, the land should be rightfully returned to its stewards since time immemorial, the Hawaiian people. This is not a land acknowledgment. This is a Land Back demand from a Native sister standing in solidarity with the Kānaka Maoli. I urge you to hear all their voices as they scream out for the return of their land because ‘āina is essential to the physical, emotional, and spiritual well-being of Kānaka.</p>	
Tay Soares		I oppose.	Please see General Response.
Ha'alilio Solomon		I oppose the ongoing military occupation and testing on all Hawaiians lands.	Please see General Response.
Tyler Sonnemaker		<p>The US Army should under no circumstance be allowed to retain any leases. They have an abysmal track record of stewarding the land the State of Hawai‘i illegitimately gave them basically for free, which has for decades been subsidized by both Native Hawaiian citizens whose land the US has illegally occupied, as well as US taxpayers who are currently settlers in Hawai‘i.</p> <p>The US Army and other military branches have repeatedly caused irreparable environmental harm (Kaho'olawe, Red Hill, Pohakuloa, Makua valley, Kaneohe Bay, the list goes on), failed to submit required EIS reports, misled the public by omitting comprehensive assessments of their environmental impact in the EIS reports they do file, and by consistently underestimating the extent and costs of the harm they have caused.</p> <p>The financial costs associated with destroying the basic resources needed to sustain human life on the Hawaiian islands are astronomical, and to continue to use these lands for military training — quite literally THE most destructive use of those lands — would be the most fiscally irresponsible decision any government could make.</p>	Please see General Response.
M. Healani Sonoda-Pale	Ka Lāhui Hawaii	Subject: Ka Lāhui Hawai‘i comments on the Draft EIS for Army Training Land Retention at Kahuku Training Area, Kawailoa-	Please see General Response.

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		<p>Poamoho Training Area, and Makua Military Reservation on the island of O’ahu (O’ahu ATR EIS)</p> <p>Aloha,</p> <p>Ka Lāhui Hawai’i is a native initiative for self-determination and self-governance formed by and for the Kanaka Maoli people in 1987. Please see our comments below on the O’ahu ATR EIS.</p> <p>Indigenous Self-Determination and Native Land</p> <p>One hundred percent of the 6,322 acres of lands being considered for retention by the US Army in the Draft EIS are Hawaiian Kingdom national lands that rightfully belong to the indigenous Hawaiians aka the Kanaka Maoli people. Ka Lāhui Hawai’i’s position has always been for the return of these lands to the Hawaiian nation and people and we are opposed to the sale, lease or transfer of these lands to non-Hawaiians in order to keep these corpus of the 2 million acres of national lands intact until they are returned to the rightful owners. These national lands were taken without Kanaka Maoli consent or compensation and our people never relinquished their rights to these lands and their sovereignty over them (see Public Law 103-150). The Territory of Hawai’i had no right to award these 65-year-leases for \$1 to the US Army. The 1959 Admissions Act (a federal law) set aside these stolen lands to be held in a public trust for five purposes including the betterment of the conditions of native Hawaiians as defined in the Hawaiian Homes Commission Act, 1920. If the “State of Hawai’i” and its agent, the Department of Land and Natural Resources, was to allow the continued retention of these lands by the US Army after 65 years of destroying cultural and historical sites, restricting Kanaka Maoli cultural access, bombing and destroying land and water features, forcibly removing Kanaka Maoli families, and littering these areas with unexploded ordinances - it would be a breach of trust. Furthermore, any retention of these lands by the US Army undermines Kanaka Maoli Self-Determination and Human Rights set forth in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and International Human Rights Conventions.</p>	

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M. Healani Sonoda-Pale	Ka Lāhui Hawaii	<p>Environment and Endangered Species</p> <p>In the Draft EIS, the US Army admits that there will be “significant adverse impacts” on land use (land tenure) and environmental justice with the retention of any lands at Kahuku, Poamoho, and Mākua. The Mākua and Kahuku sites are home to dozens of endangered native organisms and Poamoho is home to both endangered species and the critically imperiled O’ahu land snail. Warfare exercises conducted in these fragile environments puts these endangered species and the critically imperiled land snail at risk which is exacerbated by the fact that the full extent of the US Army activities on these lands have never been fully disclosed to the public. The 2021 Red Hill spill which poisoned 93,000 O’ahu residents is a prime example of how the US military lack of transparency and occupation of thousands of acres of prime O’ahu lands is a threat to public health and a livable future on O’ahu. The US military has not been good caretakers of our natural and cultural resources, lands, water, and fragile ecosystems which are home to dozens of organisms found nowhere else in the world. In fact the Draft EIS fails to acknowledge the greatest and most imminent threat to the security of the U.S. and the planet - the climate crisis - which will only be exacerbated by the status quo priorities the Army is pursuing under its training programs.</p>	<p>Please see Sections 3.3 and 3.8 of the EIS for information on biological resources and noise impacts.</p> <p>Section 3.7 discusses impacts from climate change.</p>
M. Healani Sonoda-Pale	Ka Lāhui Hawaii	<p>Housing The US Army training facilities at Makua, Poamoho, and Kahuku do not provide housing to workers. This means that affordable housing for local communities will be harder to come by around these areas which further exacerbates housing competition, decreases the availability of affordable housing, adversely impacting local residents, and contributing to the displacement of Kānaka Maoli. The Draft EIS does not assess the impact of continued military operations on an island already facing a housing crisis. The lack of affordable housing and the theft of national and traditional lands has led to the Kanaka Maoli people making up a disproportionate amount of the houseless population -</p>	<p>Sections 3.11.5.1, 3.11.5.2, and 3.11.5.3 discuss KTA, Poamoho, and MMR socioeconomic conditions, respectively. These sections discuss the housing supply for the three areas and note that demand for these areas shows a deficit. Additionally, the sections note that the Proposed Action would not result in population and growth impacts, and therefore there would be no new impacts on housing.</p> <p>The Socioeconomics subsection in Section 3.12, which includes housing, notes this would not</p>



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		they are 40% of the houseless in Hawai‘i while only making up 21% of the population.	disproportionately and adversely affect communities with environmental justice concerns under the Proposed Action. Section 3.12 has been revised to state that housing deficits do generally disproportionately affect Native Hawaiians. This impact would not be exacerbated by the Proposed Action because it does not involve any addition of military personnel to Hawai‘i.
M. Healani Sonoda-Pale	Ka Lāhui Hawaii	<p><b>Economy</b> The detrimental effects of the military’s presence on O‘ahu outweighs any short term economic gains. Relying on military jobs is not a sustainable economic strategy. The military pays only \$1 for leases, a rate that fails to contribute to the local economy meaningfully and their presence leads to contamination and extreme exploitation of the land. If the US Army is allowed to retain these lands it will ultimately lead to the continued abuse of natural and cultural resources and lands. Returning the land now to the cultural stewardship and ahupua‘a based agricultural practices of the Kanaka Maoli people would help create jobs and sustainable food systems that would decrease dependence on imported foods.</p>	<p>The EIS has been revised in Sections 2.3.4, 3.1.3, 3.2 and Appendix G to clarify the assumption that a new lease or fee simple title would be negotiated at no less than 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> <p>Future lease conditions text in the Executive Summary, Chapter 2, and Appendix G has been revised to note that future lease conditions:</p> <ul style="list-style-type: none"> <li>* Would be similar to the current lease.</li> <li>* May include references to Federal and State regulations in existence at the time of a new lease.</li> <li>* May be revised or added by the State in a new lease, but that the EIS cannot precisely analyze potential impacts because those lease conditions are unknown.</li> </ul> <p>Sections 3.3.5.1, 3.3.5.2, and 3.3.5.3 note that natural resources management measures would continue for land retained. Sections 3.4.5 and 3.5.5 note that cultural resources management measures would continue for land retained.</p>

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M. Healani Sonoda-Pale	Ka Lāhui Hawaii	<p>National Security Narrative</p> <p>In 1893, it was the US who invaded the Hawai‘i and overthrew the Hawaiian Monarchy under the false pretense of protecting American lives when nothing could be further from the truth. Egregious harm has been done to the people of O‘ahu, including the Kanaka Maoli people, in the name of “National Security”.</p> <p>After the Red Hill spill by the US military in November of 2021, the 93,000 residents on their water distribution line were told that the water was safe to drink even though military officials knew that thousands of gallons of fuel had just been spilled in the drinking water. The US occupation and destruction of our environment and natural resources has been threat to public health and in fact their presence here amplifies the threat of war on Hawai‘i shores.</p> <p>Fourth Option</p> <p>Ka Lāhui Hawai‘i would like to propose a fourth option for land retention that is not in the Draft EIS. The US Army cleans up, restores all 6,322 acres of leased lands, and then returns them to the Kanaka Maoli people.</p> <p>Sincerely,                      M. Healani Sonoda-Pale                      Spokesperson, Ka Lāhui Hawai‘i</p>	Section 2.3.3 of the EIS addresses the No Action Alternative.
Elizabeth Soto		<p>I grew up with the bombs dropped on Kaho‘olawe shaking the windows of our house. I can often hear gun fire from my home. At night, sometimes, it's the last thing I hear before going to sleep. These have never been sounds that bring with them a sense of security.</p> <p>As a mother, a teacher, and a community leader, I understand deeply the desire and need to feel safe, particularly in spaces where we raise our families—where we harvest the food that will nourish their bodies—where we tell each other the stories that remind us of where we come from and where we want to go. This is who we are. The land, the sea, the sky—they are part of us. When we ignore this or forget this, we diminish ourselves. We make ourselves smaller and less spectacular.</p>	Please see General Response.

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		<p>For decades, while offering very little care, very little reciprocity, in fact primarily the gift of destruction, thousands of acres of state land on O‘ahu have been disfigured in the name of combat readiness. For decades, with our land and our people, Hawai‘i has paid more than its share to the cause of combat readiness. It's time for this to change. The lands of Kahuku Training Area (KTA), Kawaiiloa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O‘ahu need to be cared for and returned to the people of Hawai‘i, because we are invested in the future—when we care for these lands the way this land cares for us.</p>	
Katrina Aiea, HI Souza		<p>Aloha, I am writing in response to the military's request for public comment regarding its expiring leasehold lands at KTA, Poamoho, and Makua. The people of Hawaii have already done their part in supporting the U.S. military in their efforts since World War II and the subsequent execution of \$1 leases in the 1960s. Our environment and native people have suffered the price of so-called national security for what amounts to a lifetime. We are long overdue for the return of these lands so they can be made pono. It is not right that native lands be continually tapped for exploitation by the very same military that helped disenfranchise and dismiss the native people of Hawaii with the illegal overthrow of Queen Liliuokalani. In 2024, we have that same entity justifying its continued colonization of these lands. The same echo of "keeping Americans safe" is being used. The same mentality of economy over what is morally, ethically, and environmentally right is being used. It is time for the U.S. military to return these lands to the people of Hawaii. Sincerely, Katrina Souza Aiea, HI</p>	Please see General Response.
Cori Sparks		<p>These lands are forest reserves, watershed, sacred, why destroy them through military training? Preserve them for future generations, the wildlife that already exists there, and the people who have lived here for hundreds of years.</p>	Please see General Response.
Elizabeth Spoering		<p>To whom it may concern,          This comment is voicing my strong opposition as a citizen, nurse, and public health practitioner to retaining the Kahuku Training Area.</p>	Section 3.6.1 and Appendix J have been revised to add the definition of operational ranges. Current management measures to mitigate potential impacts from hazardous substances and

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		<p>Besides the fact that the base resides on the stolen lands of the Indigenous peoples of Hawai'i, this land should be restored and returned to the first nations due to the public health impact on the local population, as well as the public health impacts on the service members who train there.</p> <p>The environmental and health impacts of military training facilities are well documented. Stanford Law researcher John Hamilton documented some of these impacts in the 2016 profile of three such facilities in the paper "Contamination at U.S. Military Bases: Profiles and Responses," as well as highlighting the lack of legal remedy for those harmed by this contamination. The US Department of Veterans affairs also highlights the health effects for soldiers of exposure to chemicals, toxins and heavy metals here: <a href="https://www.publichealth.va.gov/exposures/publications/military-exposures/meyh-2/garrison.asp">https://www.publichealth.va.gov/exposures/publications/military-exposures/meyh-2/garrison.asp</a>. While service member join voluntarily, the military and government have a responsibility to minimize risks and exposures to soldiers.</p> <p>In addition to the public health risk, it is also important to highlight the impacts on the natural environment and biodiversity of the Hawaiian islands. These islands represent a unique environment, which is under constant threat from human intervention. Species loss, loss of habitat, and loss of biodiversity are all concerns facing the islands, and protecting this habitat is far more important to the future of the world than maintaining another military installation. Please do not extend the public lands lease for this area.</p> <p>Thank you,                      Elizabeth Spoering RN                      MPH candidate, Simmons University</p>	<p>hazardous wastes are discussed in Section 3.6.5.</p> <p>Lease compliance actions and cleanup and restoration activities which would occur after lease expiration are discussed in Section 4.2.4.</p> <p>Human health and safety is discussed in Section 3.14, and mitigation measures to protect such, are provided in Appendix J.</p> <p>Impacts to biological resources, including mitigation measures to protect such resources, are discussed in Section 3.3.</p>
Kaulana Stanley		<p>My name is Kaulana Stanley, born and raised here in Waianae. I came late to the party, so I'll try not to take too much of everybody's time. . . . . When I came here, I didn't really know what to really say because everybody else said it already. But one thing I really want to say to you, sir, is that you get big kuleana. Heavy. The responsibility that you have, whatever you wrote in that book, whatever you listened to, whatever you heard, whatever you're</p>	<p>Please see General Response.</p>

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		<p>going to take back, take it back. Share it. Let them know. . . . . That is your responsibility. That is your challenge. That is that spear I'm going to cast to you, and I'd like you to catch them. I'd like you to catch them, and I'd like you to take that back and throw them into their faces. . . . . I'm a son of the mua. My father Poki'i was here, and I asked him permission to share this creed with you. Because as an nā koa to another Nakoa, kuleana is of high -- high standard and we hold ourselves to it. . . . . So this is my commitment to Nakoa and my people. I am a man. A man without fear. A man without doubt, and a man without hesitation. . . . . Time will heal my pain. Pain is weakness leaving my body. I offer my body upon the altar of sacrifice to protect my nation and my people. I live to serve, and I serve to live. Until my last breath I'll defend my brother to my front, my brother to back, my brother to my right, and my brother to my left, and together we will hold our ground and fiercely move forward because this is the way of the Moa. My actions reflect my ancestors and the queen. . . . . One day I'll earn my right to stand in the halls of my ancestors. Truth, justice, respect, unity, loyalty, courage, excellence, compassion, humility, patience, and honor. This is the law of the mua E kū, e ola, a kau a kaniko'o a palalauhala 'ia makeole kolopupū e. Those words is what I was born into in mua, and I hold by that as a kia'i, as a protector, as a servant to my community. . . . . Another saying that I would love to leave with you, iwi o ku'u iwi, koko ku'u koko, pili ka mo'o. I'll say it again, my bones is your bones, my blood is your blood. iwi o ku'u iwi, koko ku'u koko, pili ka mo'o is our pili to the mo'o is our mo'okū'auhau, the mo'olelo that we share. Each and every person that came here, each and every person that is still here come from a long line, a long line -- do your genealogy. Find out where you from. . . . . Look back if you haven't, look how far your people came from. Because us sitting here, we know how far our people came from. And that's what we fighting for. We fighting for them because they sacrificed their time for us to be here.</p>	

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Kaulana Stanley		I am testifying against the military re-newing their lease. ‘A‘ole means NO and it is time to go! E ola!	Please see General Response.
Timothy Eliel Starbright		<p>I am against renewing these leases for these Reasons. The Army admits to harming the land and environment in the Draft EIS. They admit there will be "significant adverse impacts" on land use (land tenure) and environmental justice with the retention of any lands at Kahuku, Poamoho, and Mākuā.</p> <p>The Army does not commit to clean up these lands until after the EIS is finalized, and vague terms in the 1964 leases do not require future clean up actions.</p> <p>The U.S. military has never returned Hawaiian lands in any usable state. renew leases</p>	<p>Please see General Response.</p> <p>Section 3.6.1 and Appendix J has been revised to add the definition of operational ranges. Current management measures to mitigate potential impacts from hazardous substances and hazardous wastes are discussed in Section 3.6.5.</p> <p>Existing Conditions discussion in Section 3.6.5.3 provides the procedures in place at MMR for areas that contain or are likely to contain MEC. Text added to the Environmental Consequences discussion under Section 3.6.5.3 states that the Army conducts range management activities to ensure that no materials, including debris, trash, and brass are left behind.</p> <p>Lease compliance actions and cleanup and restoration activities that would occur upon lease expiration are discussed in Section 4.2.4.</p>
Kapomaikai Stone		Clean up & leave, I vehemently oppose the reknewal of all army leases occupying Hawai‘i. We call upon the military to evacuate all our lands that you occupy, including Kawailoa, Kahuku, Poamoho, Pohakuloa, Makua, Ke awa lau o Pu‘uloa & Kapukaki & all lands currently occupied. These lands also need to be cleaned up first, resources need to be committed to this ecosystem restoration whereas you are an integral part of the ecosystem collapse due to practicing killing which is in fact real killing. Return all lands, evacuate & restore all the ecosystems. Informed read by our communities. Evacuate Hawai‘i, establish a timeline & a budget by this year - 2024. No retention of any lands.	Please see General Response.
Janine Strong		I strongly oppose the continued military occupation and training on the lands of O‘ahu. The presence of military training areas has	Please see General Response.

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		<p>resulted in significant environmental degradation, cultural desecration, and negative impacts on the health and well-being of local communities. Hawaiian lands are sacred and hold immense cultural significance to the Native Hawaiian people. Military activities, including live-fire exercises and other training operations, have led to the destruction of irreplaceable cultural sites and artifacts. This not only disrespects the heritage of the Native Hawaiian people but also violates their rights to preserve and protect their cultural and historical legacies. The environmental impact of military training is equally concerning. The use of these lands for military purposes has led to soil contamination, water pollution, and the destruction of natural habitats, endangering native flora and fauna. The long-term ecological damage caused by these activities is irreversible and poses a severe threat to Hawaii's unique and fragile ecosystems. Furthermore, the continued military presence on O'ahu has adverse effects on the health and safety of local residents. The noise pollution, risk of accidents, and exposure to hazardous materials are ongoing concerns for those living in proximity to military training areas. This not only compromises their quality of life but also raises serious public health issues. It is imperative to consider the voices and rights of the Native Hawaiian community, who have long called for the return of their lands and the cessation of military activities that harm their environment and culture. Sustainable alternatives must be explored that respect the rights of the indigenous population and prioritize environmental conservation. I urge the decision-makers to reject the retention of Army training lands on O'ahu and to work towards restoring these lands to their rightful stewards. Protecting Hawaii's cultural and environmental heritage should be a priority over continuing activities that cause harm and discord.</p>	
Kaiqing Su		<p>The U.S. Army has done enough harm to the Kanaka Maoli people. But it's never too late toe END THE MILITARY LESASE NOW.</p>	<p>Please see General Response.</p>
Lena Suzuki		<p>Hi. Aloha. I'm Lena Suzuki with the Waianae Moku Kupuna Council, and I just wanted to -- I'm a kakou to Uncle Sparky as well and one of the things he always tells us or reminds us about the military is</p>	<p>Please see General Response.</p>

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		<p>that you guys are our neighbors.· But you guys are our ohana that is behaving badly, and there's a lot of toys that you guys left in our moku that you guys didn't pick upyet.· So there's a lot of kuleana in our moku of Waianae. . . . . One of the things I wanted to just make a statement about is please don't come to different mokus and talk about different mokus issues.· So you come to Waianae, you talk about Waianae.· We're not here to talk about Kahuku or Pohakuloa or any other places in this -- on this state.· We are here specifically to talk about Waianae, and so we would appreciate it that when you guys come, I see on the map there's three different lands you guys want to talk about, but for Waianae, we talk about Waianae. Thank you.</p>	
Kestrel Swift		<p>Aloha,my name is Kestrel Swift, I am a student at the University of Hawai'i at Hilo studying Environmental Science and conservation. Based in part on my moral values and in part on my knowledge of environment and social problems caused by Military land management, I strongly oppose the Army Training Land Retention (ATLR) at Kahuku Training Area (KTA), Kawaioloa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O’ahu. The Army has illustrated again and again that it cannot be entrusted with the care of Hawaiian land. From the poisoning of O'ahu's water to the bombing of PTA and Kaho'olawe and beyond, the US military, including the Army, has decimated and desecrated the 'āina and put the health of the land, people, native species, and natural resources into jeopardy. It is in the best interest of all of Hawai'i to deny the retention of this land by the US Army. Thus, I strongly oppose the Army Training Land Retention (ATLR) at Kahuku Training Area (KTA), Kawaioloa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O’ahu.</p>	Please see General Response.
Kainoa Tadaki		<p>There is a reason why theland was never "given" or available for lease-less ownership.                      The holder knew the land used for artillery training would need to be given back. Now it is time to give back. Let the land rest and heal and it will. We deserve to reclaim all three sites, the US Military or</p>	Please see General Response.



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		Department of Defense has NO claim on these lands. Please understand that we are tired and the land is tired. Make the right decision. Thank you.	
Naya Tadaki		I am opposed to the further leasing/land swaps/and renewal of existing leases of State Land to the U.S. military. I believe the US military should clean up and continue cleaning up the damage caused by military practices as the land has been contaminated with a wide range of toxins from bombshells. The land should be restored and given back to the people of Hawai'i specifically Hawaiians who were so wrongfully forced to move from a place they have always known, a place where even my ancestors come from that I have never been able to truly visit. The Army leases should not be renewed under any circumstances.	Please see General Response.
Jason Tam		Please don't extend this lease of stolen Hawaiian land. Military presence on Hawaiian lands has caused extensive damage to our environment and threatens our precious natural resources like our water. Army facilities threaten endangered organisms like the 'apapane and 'i'iwi birds.	Please see General Response.
Mary Tam		<p>Aloha,</p> <p>I am a resident of Hawai'i, born and raised on the island of O'ahu. I am writing to oppose the Army's proposal "to retain up to approximately 6,322 acres of State-owned lands at KTA, Poamoho, and MMR on the island of O‘ahu. The Proposed Action is a real estate action that would enable continued military use of the State-owned lands at these three installations on O‘ahu." Of this ‘āina, I am most familiar with Mākua Valley. When I think about what she has been through, I cannot stay silent as the military attempts to renew an extractive lease.</p> <p>Over several decades, including pre-§1-lease, military training in the valley included aerial bombing, shelling the valley from the ocean, live mortar rounds, anti-tank artillery, and live machine-gun fire. Military presence in Mākua has caused great harm, including but not limited to the desecration of sacred cultural sites, and destruction of native habitat (which includes rare plants and animals). Thanks to the advocacy of Mālama Mākua, Earthjustice,</p>	Please see General Response.

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		and community members, there has been no live-fire training since 2004.	
Mary Tam		The Army has since removed some of the remaining explosives, particularly after live-fire training back in the '90s caused wildfires which exposed several sacred cultural sites (many of which were damaged). There are still many areas that contain unexploded ordnance. <u>The DEIS says that the Army 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 expenditures for removal of shells will not exceed the fair market value of the land."</u> This demonstrates a lack of understanding of the inherent value of ‘āina, and a lack of commitment and ability to <u>definitively clean up their own toxic mess.</u> The Army is not fit to oversee this precious land.	The text quoted in the comment is from the original 1964 lease agreements for the State-owned lands between the State and the U.S. Government that are in Appendix G of the EIS. Section 2.1 of the EIS discusses lease compliance actions at the end of the current lease includes removing weapons and shells (e.g., bullet casings, mortar shells, artillery shells, rifle shells). Under CERCLA, cost is not the lone factor in determining whether a remedy is required. It is one of nine factors in determining which remedy should be selected.
Mary Tam		It is time for the ‘āina to be fully and rightfully returned to those who truly care for it. DO NOT continue to exploit Hawai'i through the renewal of these leases. Live pono. Mahalo, Mary Tam	Please see General Response.
Wayne Chung Tanaka		2. The DEIS must assess all cumulative and secondary impacts incident to the proposed retention alternatives. SCOG also emphasizes the importance of assessing all secondary and cumulative impacts of the proposed retention action and alternatives. This includes not only the impacts arising from activities taking place on the lands proposed for retention, but all impacts “incident to and a consequence of the primary impact” of land retention.[2 Sierra Club v. Dept. of Transportation, 167 P.3d 292, 115 Hawai‘i 299 (2007).] For example, under Hawai‘i environmental review law, an environmental impact statement triggered by harbor improvements necessary for the operation of an inter-island ferry should not merely assess the direct impacts of the harbor improvements “in isolation,” but must also assess the secondary environmental impacts of the inter-island ferry’s operations as well. [3 Id.] Similarly, an environmental impact statement triggered by the leasing of a public pipeline must evaluate not only the impacts of the lease alone, but also of a resort that would be developed as a consequence of the lease.[4 Molokai	The Proposed Action is retention of State-owned lands and there is no need to address impacts unrelated to the Proposed Action and cumulative impacts not relevant (such as from joint training exercises that do not use State-owned lands or Indo-Pacific deterrence strategies) when combined with the Proposed Action.

Commenter	Submitted By	Comment	Response
		<p>Homesteaders Ass’n v. Cobb, 629 P.2d 1134; 63 Haw. 453 (Haw. 1981).] Here, the DEIS in several instances focuses only on impacts from activities taking place on the lands proposed for retention, rather than all secondary and cumulative impacts that would also result as a consequence of a retention action. In one instance, the DEIS provides only a summary assessment of the greenhouse gas emissions from continued training on the lands proposed for retention. It neglects to account for the full range of emissions and climate impacts “incident to and a consequence of” the land retention alternatives, including from joint training exercises and the Indo-Pacific deterrence strategies that has been asserted as dependent upon land retention and training.[5 Gen. Charles Flynn, Column: Leased land vital to military readiness, Honolulu Star-Advertiser, July 7, 2024, available at <a href="https://www.staradvertiser.com/2024/07/07/editorial/island-voices/column-leased-land-vital-to-military-readiness/">https://www.staradvertiser.com/2024/07/07/editorial/island-voices/column-leased-land-vital-to-military-readiness/</a>.] Accordingly, all impacts that may arise from the Army’s retention of state lands - including impacts from military activities on other lands and waters that would be enabled or facilitated by the retention alternatives – must be assessed by the DEIS and any subsequent drafts.</p>	
Dyson Chee (Wayne Chung Tanaka)	Sierra Club O’ahu Group	<p>SCOG strongly urges the no-action alternative, i.e. the discontinuation of military retention of the subject lands and the remediation of the cultural and environmental harms that have been perpetrated against these culturally, ecologically, and agriculturally significant areas over the last six decades of military control. We re-emphasize the concerns raised in the joint letter submitted by the Council for Native Hawaiian Advancement citing the extensive “pattern of abuse and exploitation” that has occurred on these lands, and likewise calling for the no-action alternative. SCOG also echoes the concerns and comments submitted by KAHEA, as articulated in the talking points available at <a href="http://tinyurl.com/eiskahea">tinyurl.com/eiskahea</a>, and incorporates them by reference herein</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
<p>Dyson Chee (Wayne Chung Tanaka)</p>	<p>Sierra Club O’ahu Group</p>	<p>SCOG offers the following additional comments regarding the DEIS: Significance assessments should be made based on the no-action alternative, not on existing conditions As a preliminary matter, SCOG is deeply concerned regarding the DEIS’ use of existing conditions to assess the significance of impacts under the retention alternatives. Utilizing current and historical impacts - which have been particularly heightened for the Native Hawaiian and similarly situated communities - as a baseline for comparison obscures or even mischaracterizes the impacts of the alternative actions considered in this analysis. For example, the housing and traffic impacts arising from the retention of the Kahuku Training Area (“KTA”) are characterized as negligible, as retention would result in “no proposed changes in the permanent location of soldiers or other training participants. They would continue to live and transit from other locations on O’ahu; therefore, no changes in households, housing, or quality of life at KTA would be generated.”[1 DEIS at 3-249.] However, this assessment obscures the impacts of the “retention” action(s), as the population, transit, and housing impacts of soldiers and training participants at KTA would not simply “continue” if the leased state lands were not retained. Similarly, the payment of “fair market value” (which is itself an extremely ambiguous and uncertain term) under the retention-via-lease alternatives is characterized as “beneficial” when compared to the current status quo lease rent of \$1. However, such an amount may not necessarily be “beneficial” when compared to the values –financial and otherwise – that could be realized from these lands if no retention action is taken, and the currently occupied state lands are restored and returned to the state. These are just two of many examples found throughout the DEIS that demonstrate the inadequacy of the analysis in the document. Insofar as an environmental impact statement should evaluate the impacts of an action, then the impacts of that action must be evaluated against no action being taken – in this case, the return of the lands at issue.</p>	<p>There is no NEPA or HEPA requirement that states the No Action Alternative is the baseline. Existing conditions, which represents the current reality, is the baseline and this approach to the analysis is appropriate. The baseline for analysis considers all prior and current ongoing activities, environmental monitoring, and conservation activities. Each resource area section discusses the combined impact of past, present, and reasonably foreseeable future actions. Future State use of the lands not retained by the Army is beyond the scope of this EIS.</p> <p>Sections 3.11.5.1, 3.11.5.2, and 3.11.5.3 discuss KTA, Poamoho, and MMR socioeconomic conditions, respectively. These sections discuss the housing supply for the three areas and note that demand for these areas shows a deficit. Additionally, the sections note that the Proposed Action would not result in population and growth impacts, and therefore there would be no new impacts on housing.</p>

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<p>Dyson Chee (Wayne Chung Tanaka)</p>	<p>Sierra Club O‘ahu Group</p>	<p>The DEIS vastly conflates and mischaracterizes the environmental justice impacts on Native Hawaiians, including Native Hawaiian children SCOG appreciates the DEIS’ recognition of EO14096, the federal Apology Resolution recognizing the harms of land dispossession on the Native Hawaiian people, and its passing reference to harms that have arisen from the historical and ongoing occupation and use of the “ceded” lands proposed for retention. However, SCOG notes that the DEIS fails to adequately identify and assess the many specific harms that ongoing retention in any form may have on the entire Native Hawaiian community as well as on lineal descendants and others with ancestral or customary pilina to the ‘āina in question, including children. Occupying Native Hawaiian lands for military activities – and the restrictions on public access to these lands that accompanies military land uses – is an on-going and deeply traumatizing severing of the relationship between Native Hawaiians and the land of their ancestors. A. The DEIS fails to adequately recognize much less assess health and well-being impacts on the Native Hawaiian community from the retention and continued denial of Native Hawaiian self-determination over “ceded” lands The range of harms to the Native Hawaiian community resulting from the non-consensual and uncompensated dispossession of ancestral lands, including “ceded” and public land trust lands, is very well documented. Three decades ago, the 1993 Apology Resolution recognized that “the health and well-being of the Native Hawaiian people is intrinsically tied to their deep feelings and attachment to the land,” and that “the long-range economic and social changes in Hawai‘i over the nineteenth and early twentieth centuries have been devastating to the population and to the health and well-being of the Hawaiian people.”[6 Pub. L. 103-150 (1993).] Fifteen years later, the Hawai‘i Supreme Court acknowledged the deep connection between the Native Hawaiian community and ‘āina, a connection whose loss cannot be remedied by mere monetary reparations: “Although an argument could be made that monetary reparations would be the logical remedy for such loss, we are keenly aware — as was Congress — that ‘the</p>	<p>The analysis at the end Sections 3.2, 3.5, 3.11, and 3.12 discuss the combined impacts of past, present, and reasonably foreseeable future actions for Land Use, Cultural Practices, Socioeconomics, and Environmental Justice, respectively. Text has been added to Section 3.12 Environmental Justice to further assess significant impacts on Native Hawaiians.</p>

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		<p>health and well-being of the [n]ative Hawaiian people is intrinsically tied to their deep feelings and attachment to the land[.]’ . . . ‘Āina, or land, is of crucial importance to the [n]ative Hawaiian [p]eople—to their culture, their religion, their economic self-sufficiency and their sense of personal and community well-being. ‘Āina is a living and vital part of the [n]ative Hawaiian cosmology, and is irreplaceable. The natural elements—land, air, water, ocean—are interconnected and interdependent. To [n]ative Hawaiians, land is not a commodity; it is the foundation of their cultural and spiritual identity as Hawaiians. The ‘āina is part of their ‘ohana, and they care for it as they do for other members of their families. For them, the land and the natural environment is alive, respected, treasured, praised, and even worshiped.”[7 OHA v. HCDCH, 117 Hawai‘i at 214, 177 P.3d at 924 (2008) (original emphasis omitted) (format altered) (brackets in original).] More recently, health scholars have likewise identified the occupation and militarization of Hawai‘i as historical determinants of Native Hawaiian health; determinants that, along with the ongoing denial of self-determination and indigenous international rights, contribute to the many disparate health challenges facing the Native Hawaiian community, including and particularly youth. [8 Dr. Joseph Keawe‘aimoku Kaholokula, Maui Ola: Pathways toward Social Justice for Native Hawaiians (2015), available at <a href="https://www.researchgate.net/publication/293817588_Maui_Ola_Pathways_toward_Social_Justice_for_Native_Hawaiians/">https://www.researchgate.net/publication/293817588_Maui_Ola_Pathways_toward_Social_Justice_for_Native_Hawaiians/</a>.] Such disparities are particularly glaring for Native Hawaiian youth, including: a 10% higher rate of attempted suicide among Native Hawaiian male tenth graders compared to their non-Hawaiian peers; the highest rates of feelings of sadness or hopelessness among Native Hawaiian ninth grade female students (47.7%, compared to 35.4% for non-Hawaiian female students); the highest rates of self-harm among Native Hawaiian ninth grade female students compared to their non-Hawaiian peers (42.2% vs. 33.4%); and a significantly higher rate of anxiety among Native Hawaiian female students in middle school compared to their non-</p>	

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		<p>Hawaiian counterparts (1/3 vs. 1/4).[9 Office of Hawaiian Affairs, Haumea: Transforming the Health of Native Hawaiian Women and Empowering Wahine Well-Being (2018), available at <a href="https://www.oha.org/haumea/">https://www.oha.org/haumea/</a>.] In light of the above, the Army’s continued retention of “ceded” lands may foreseeably perpetuate significant adverse impacts on the health and well-being of the Native Hawaiian community. The trauma of such continued dispossession and denial of self-determination over these lands would likely be exacerbated should these lands be retained by the Army, given the overwhelming Native Hawaiian calls for the cessation of military occupation following six decades of abuse. However, the DEIS merely acknowledges that retention of the state “ceded” lands at issue result in a continued “loss of connection” to ‘āina and cultural resources, and the continued frustration of the public land trust (which itself is a largely unfulfilled “monetary” mechanism the Hawai‘i Supreme Court has recognized as an insufficient “remedy” for historical injustices). The DEIS fails to provide any specific assessment on how the rejection of Native Hawaiian calls for the relinquishment of these “ceded” lands may impact the physical, emotional, mental, and spiritual health and well-being of the Native Hawaiian community, including and particularly on that of Native Hawaiian children. Moreover, no meaningful analysis is provided regarding the many beneficial impacts, direct and indirect, that may result from the no-action alternative, including through the potential dedication of these lands for Native Hawaiian stewardship and use for rehabilitation, cultural perpetuation, or similar programming, as well as through the process of healing and reconciliation that would be advanced through the Army’s relinquishment of these lands. B. The DEIS fails to account for other social determinants of health of Native Hawaiians. SCOG notes that despite the commitment made by both state and federal governments to address the social determinants of health of Native Hawaiians,[10 HRS § 226-20(a)(7); 42 USC § 11702.] the DEIS does not appear to employ a social determinant of health analysis beyond its summary acknowledgement of cultural</p>	

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		<p>impacts. To ensure a full understanding of the wide range of potential impacts from its proposed action and alternatives, and to fulfill the statutory commitments made on both the state and federal levels, the DEIS must ensure that the unique social determinants of health relevant to Native Hawaiian health and well-being are adequately considered. SCOG strongly recommends reviewing and applying the “Mohala i ka Wai, ka Maka o ka Pua” framework promulgated by Dr. Keawe’aimoku Kaholokula and other health practitioners and scholars,[11 See Kaholokula, supra note 8.] to ensure that the DEIS adequately addresses impacts on social determinants of health including but not limited to those associated with cultural practices and identity, land tenure, housing affordability, food availability, native rights, self-determination, and ‘āina-based education, among others</p>	
<p>Dyson Chee (Wayne Chung Tanaka)</p>	<p>Sierra Club O’ahu Group</p>	<p>The DEIS must assess the adequacy of the proposed action and alternatives to ensure national, regional, and planetary security in the face of the greatest threat humanity has ever faced. Finally, SCOG strongly urges the DEIS to include an assessment of whether any of the current proposed alternatives, including the preferred action, will achieve the Army’s and Department of Defense’s overarching national security mission, and whether alternative approaches would more meaningfully confront the greatest threat to security and survival that humankind has ever faced: the rapid destabilization of our climate. SCOG notes that Army General Charles Flynn has stated, as a representative of the Department of Defense, that maintaining the Army’s access to the state lands at issue is required to “defend our nation, our freedoms and our prosperity,” and to “confront our nation’s threats.”[12 Flynn, supra note 5.] According to General Flynn, soldiers must also train in Hawai’i - using these lands - to “deter our adversaries,” and to “prepare to defend the nation while also preserving the natural and cultural heritage” of our islands.[13 Id.] First, as described at the beginning of this comment letter, all secondary and cumulative impacts from activities that depend upon the retention of the state leased lands must be evaluated in the EIS process. Given General</p>	<p>Addressing impacts from joint training exercises and DoD-wide impacts on and from climate change and other considerations raised in the comment are not relevant to retention of State-owned lands and is beyond the scope of this EIS. Section 1.4 presents the scope of the analysis in the EIS.</p>



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		<p>Flynn’s comments, those deterrence and other Department of Defense activities that are dependent upon the retention of these lands - including but not limited to the “joint and multinational training exercises” cited in the DEIS[14 DEIS at 39.] - must be identified and evaluated with respect to their reasonably foreseeable environmental impacts. Such impacts should include those associated with greenhouse gas emissions from relevant activities across Hawai’i and the Pacific, by the U.S. Department of Defense, its regional allies, and its “adversaries” whose military activities and attendant carbon footprints will foreseeably increase in response.[15 See also 40 C.F.R. § 1502.14(a).] Second, and more importantly, the DEIS should also contemplate whether the preferred retention action will necessarily address the greatest threat to the United States and “our freedom and our prosperity,” along with our planet as a whole: the rapid destabilization of our climate. As countless studies have indicated, without drastic and transformative pivots on a global scale, the devastation that can and will occur would far exceed what even the most powerful “adversary” to the United States could possibly threaten, including but not limited to the displacement of an estimated 1.2 billion people by 2050, life-threatening heat waves impacting three-fourths of humanity annually, chronic agricultural failures and mass starvation on an unprecedented scale, and the extinction of a quarter of the Earth’s macroscopic species.[16 See, e.g., Chip Fletcher, et. al., Earth at risk: An urgent call to end the age of destruction and forge a just and sustainable future, 3 PNAS Nexus 106 (2024).] In the shorter term, disrupted global supply chains, the chronic inundation of coastal U.S. cities, outbreaks of new and formerly eradicated diseases, and worsening and more frequent natural disasters, would also increasingly undermine the security, freedoms, and prosperity of the United States, as well as erode the natural and cultural heritage of Hawai’i and numerous other Pacific Island jurisdictions. Notably, the retention alternatives would in many ways exacerbate the vulnerabilities of Hawai’i to climate</p>	

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		<p>destabilization, including the cumulative reduction of our long-term food security resulting from the occupation and unremediated contamination of historically abundant agricultural lands, combined with Hawai’i’s climate-vulnerable dependence on imported food. The harm to ‘āina and Native Hawaiian health and well-being resulting from any retention of the subject lands would also undermine the social cohesion and cultural values and practices that may be the foundation of our islands’ ability to navigate the climate crisis. Accordingly, an assessment of the effectiveness and opportunity costs of current military policies and priorities embodied in the preferred retention alternative should minimally be included as part of the DEIS. Alternatives that could actually and meaningfully confront this real and present threat to the United States, its freedoms, and its prosperity should also be evaluated consistent with HEPA and NEPA requirements.[17 40 C.F.R. § 1502.14 (“...agencies shall: [] Rigorously explore and objectively evaluate reasonable alternatives to the proposed action”); 40 C.F.R. § 1508.1(hh) (“Reasonable alternatives means a reasonable range of alternatives that are technically and economically feasible, and meet the purpose and need for the proposed action.”); Haw. Admin. R. § 11-200.1-17(f) (“The draft EIS shall describe in a separate and distinct section alternatives which could attain the objectives of the action, regardless of cost, and explain why they were rejected.”).] Such an alternative may include the development and widespread sharing of decarbonization technology, supportive infrastructure, and other resources with other militaries and civilian populations; concrete benchmarks for the reduction of carbon-intensive training and other activities to the bare minimum, and for the restoration and return of lands and waters to indigenous stewardship; and the continual tracking of the full range of threats the climate crisis poses to the United States and the planet, among other critically needed strategies. Accordingly, SCOG urges the selection of the no-action alternative, and further urges any future draft of the DEIS to incorporate the many additional considerations</p>	

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Kekuawela Tauala		<p>raised in this letter and others submitted in support of the no-action alternative.</p> <p>Aloha mai kakou. 'O wai Kekuawela Burgess Tauala.· No waianae mai au. . . . . Aloha, everyone.· My name is Kekuawela Burgess Tauala.· I'm born and raised in Waianae and currently living in Waianae.· My family has been here for a couple of generations already. . . . . I do not agree with any renewal of the leases in Hawaii.· I support Uncle Sparky's idea for an option 4 where you guys leave, and you guys also clean up your mess. . . . . There is no need for the Army to renew their lease in Makua or any other aina when they have said themselves in 2023 that they no longer need to conduct live fire training.· The Army does not belong here.· Hawaiians belong here.· The Waianae community belongs here.· Those who were displaced many years ago, their mo'opuna and their ohana deserve to be here.· You guys are not going to stay. . . . .</p> <p>· In the next five years, it is your kuleana, the Army's responsibility, to clean Makua. We are -- we are not certified in cleaning unexploded ordnances.· You guys are.· The aina we receive back should be in better condition because you guys have all the technicians and all the workers that can do that.· You guys want to bomb and place soldier on our aina, you guys better clean up your mess. . . . . You guys don't understand that aina is sacred.· All aina is sacred.· Makua is sacred. Makua and olelo Hawaii means parent or parents. Makua is our parent, our parents, our kupuna.· We are her keiki.· How could you hurt your own parents? Would you go and hurt your own parents?· No, I don't think so.· Why would we continue to allow you guys to hurt our -- our makua and our kupuna? . . . . . In Makua or wherever, in Kahuku, Pohakuloa, it is my hope, my dream that one day, 60 years from now, I will be with my mo'opuna living and hanging out in Makua, whatever, having fun with them, playing with them, sharing with them the stories of Kamohoali'i and the mo'o that lives there, sharing with them the kupuna who have fought to get Makua back for us and for them. . . . .</p> <p>· But most importantly, being able to be with them over there in Makua without the fear of being harmed.· Mahalo.</p>	Please see General Response.

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Kekuawela Tauala		<p>Aloha, my name is Kekuawela Burgess Tauala. I do not support the alternatives that were listed for the three sites and the alternatives that were chosen by the Army. I suggest that for the fourth "alternative" which is the No Action alternative, that the Army or the EIS includes/adjusts this alternative to include a cleaning process of the the areas for un-exploded ordinances and harmful waste that could pose a threat to humans and the environment. Or include a process where they would pay for a cleaning service to whoever owns the areas after the leases are lapsed in 2029. Overall, I believe and support the return of all these lands (in healthy conditions) that are being occupied by the US Army to the Native Hawaiian people and their communities. Mahalo.</p>	Please see General Response.
Shelly Taylor		<p>I am urging that the US military NOT be granted unlimited use of Hawai’ian lands for Army training.                      The US has been occupying the islands since 1895 -- more than six decades before Hawai’i’s statehood. In the many years since the land has been destroyed, not stewarded. It’s beyond time to return these lands back to their proper stewards: the Hawai’ian people.</p>	Please see General Response.
Tehya Taylor		<p>Aloha,                      I strongly oppose the Army’s retention of the 6,322 acres of state land as well as the military’s retention of other lands throughout Hawai’i. The U.S. military has never been a good steward of Hawaiian land and should not be allowed to continually abuse Hawai’i’s lands, waters, and people. This land should be remediated by the military– using their money and resources– and returned to the Hawaiian people.</p>	Please see General Response.
Troy Taylor		<p>To Whom It May Concern: Aloha e,                      I submit this public comment in strong opposition to retaining and extending the leases for Army Training Land Retention (ATLR) in Makua, Poamoho, and Kahuku. The proposed retention of the occupied lands for US Army and DoD use maintains an imperial relationship proven disastrous to the ecosystems and the sentient life of this island. I strongly affirm the "No-Change Alternative" which would see the completion of the current lease and return of these lands specified in 2029.</p>	Please see General Response.

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Laulani Teale		<p>Aloha. So everybody here in this community has already said so much, and I can't -- I have nothing to add in terms of the reasons why you should not continue with this attempt to lease these lands from the State of Hawaii, who has no rightful power to lease them in the first place. However, I would like to ask that you please add to the final EIS four words, and I want to ask you if you could please make sure that these four words are clearly written as such in the final EIS. And those four words are: They do not consent. Okay. They do not consent. In every community that you have gone to, they do not consent. I don't want to read a final EIS that talks about how, oh, we heard strong feelings from so many people. We heard passionate speeches and stories about history, and all of that stuff. What I want to see is: They do not consent. Say it about every single place that you have gone and very clearly, and don't try to make it into anything else. So Kehau, I'm gonna kind of ask you, because, you know, I know -- not to try to put it on you, but I know that it may be difficult to understand the concept of free, prior, and informed consent -- although, you know, we kind of, like, expect all of our opio to understand that when they go out on a date, right? So, you know, it's not actually that hard to grasp. But if you don't have -- if you don't have consent of the people, then you're not their government, for one thing, you know. You are an occupier. And it's not a -- you know, there's not anything -- any exchange that can make it other than that. That is occupation, and that should be said in there somewhere. But what I really want is to just that simple clarity that that is very clear when you refer to every single community that you spoke to. And just to make it clear for those few who are over there, if you guys agree, then I'd like for everybody to say: We do not consent. Okay? [THE AUDIENCE: We do not consent.] Mahalo.</p>	Please see General Response.
Laulani Teale		<p>Did 118 ever show up? [Moderator: No. No. Go for it.] Okay. Okay. Aloha. I'd like to -- I'd like to divide my testimony into two sections. So the first one I want to -- I'd -- I would like to speak to you as a human being, as to everyone who's part of the U.S. Military here representing the U.S. Military as on the human level. . . . .</p>	Please see General Response.

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		<p>And I want -- the main thing that I want to say there is that when I speak to the U.S. Military, I want you to know that I'm not speaking to you. And I want you to know why, because all of the things that we collectively have to say to the United States Military, for one thing they may be harmful to you to hear them, and not be able to do anything about it. But it's also very, very harmful to the people to speak to a human being. You know that's the way that aloha works, right? . . . . When we give our aloha we're speaking truth, even if it's hurt, even if it's angry, it's still aloha. And to present this truth to you in aloha there is an expectation that as a human being you can -- you will reciprocate and take this very clear message. This is a very clear message, and act accordingly, which would mean to do none of the options. You know, it would mean to end the lease. . . . . We know from history that that's never happened before. So I just want to say I -- I've got something to say to -- with that. I want to say something to the United States Military, and I want to be very clear that I'm not saying this to you, okay? Because in order to protect our health, I think, that we need to be able to speak clearly only to the U.S. Military and -- and my young folks over there who are -- who have been helping out might be able to help me out in this. It's very short. . . . . No lease on stolen lands. Don't touch us with your bloody hands. U.S. Military out! Real peace is what we're talking about. Take your bombs! Take your trash! Shove them up your balderdash! Rise up kai'i and fight against this hewa empire's might! For future generations' sake, hamau, United States. . . . . USA has got to go with this dog and ponyshow! hamau aia. Aloha aina is the way, not the bloody USA! Occupation is a crime in Hawaii and Palestine! People, people stand as one! Unstoppable by any gun. Bombs are nothing to our love. Aloha means resist this shove. Ku-ea every day. Ku-ea every day, every day. . . . . Mahalo. Aloha.</p>	
Laulani Teale		<p>Mahalo. For my testimony, I'd really like to just make a request. And I know I made one yesterday, and I want to emphasize that again, that -- that the EIS clearly says that they do not consent. Yeah?. They do not consent. So that -- that is very important. The</p>	Please see General Response.

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		<p>request that I want to make tonight is that I'd like -- I'd like to ask -- I don't know what you're capable of. I don't know whether you can actually hear the nearly 100 percent of these testimonies that are saying, "Stop. Do not pursue this. Please withdraw." I don't know whether your humanity is capable of overcoming whatever it is in the job that every other person in your position has never been able to overcome. I don't know whether you're capable of that or not. But what I do think you -- you are capable of is giving these people, who have invested their time, their lives -- you know, just remember, for every one of these two minutes, there's 200 years of suffering, work, all kinds of things that go into those two minutes. And what I'd like to ask back for that is their mana'o back. And what I'd like -- and Kehau, I'd like to ask you, because I know you're good at this, to make sure that every single mana'o is transcribed, transcribed in words, put into PDF form, with the name of the speaker clearly on it, made publicly available, yeah, with every single one, and -- and then given back to the people. Because this may or may not be the place where the change gets made, but those mana'o are capable of doing a lot more. So that is -- that is my request. And also, one more time, to be very clear, they do not consent. I want to see it loud and clear in that EIS, please. Because that is the least that you can do, out of all of this. And I want to -- I want to ask everybody else one more time to just say -- if you do not consent, say, "We do not consent." Okay? We do not consent. [AUDIENCE MEMBERS: We do not consent.] Okay. Mahalo nui.</p>	
Sweet Tee		<p>Aloha. I'm known as "Sweet Tee." And that's it. That's all you need to know. Okay? I'm going to -- you got the history lesson already. Right? I am a vet, sad to say. But when I joined, I did not know what I was joining. I thought I was an American, just like probably everybody in this room. I slowly discovered the truth while being in the military. Afghanistan. I was deployed right before bin Laden got taken out. It was there that I'm sitting in a tower, that I shouldn't have been in, because I am a female, and I had two Afghan males with me. Rocks started flying at this tower. I look out, and it's a little kid. Those two Afghan soldiers, they started pointing their weapon</p>	Please see General Response.

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		<p>at him. I said, "What are you doing? It's a kid." And he goes, "But he's on the outside." I go, "But he's still a kid, and he's still one of your people." At that moment, I thought of my people. I was the one wearing the uniform. I was the one oppressing my people. So when I came back from Afghanistan, I got the hell out. And I made sure damn well you guys paid for me to get out, and still continue to pay for me. Okay? Along my way -- this -- this time limit stuff can go away. You know why? Because your time is up. Your time is up. This is our time. A hundred and thirty-one years we've been waiting to participate. We ain't participating anymore. "No" means "no." Okay? And along my journey of starting to fight for my 'aina and my people, you guys are the biggest terrorists in the entire world. This RIMPAC, this RIMPAC crap -- why do we need war? Why? World domination. Ego. Pride. Money. Go. Go build your own little freaking floating island somewhere in the Pacific, and leave us alone. You guys don't get it. Like Brother was talking about, getting blocked in his home because he couldn't get to the hospital because of all the military personnel. Let me tell you -- and I know this is true because I wore that uniform -- when I put that uniform on, before I knew better, I walked around proud. Yeah. Oh, look. Everybody's looking at me. Everybody's getting out of my way. You damn right. You better get out of my way. And I guarantee you that's how you feel every time you put that uniform on. And that's how everybody else in the military feels when they put that uniform on. They look down upon us. They think they can trample on us. Is that right? No, it's not. Another thing. You guys only listen to US law. What is your oath? What did you take? I uphold and defend the United States Constitution of both foreign and domestic. Right? What is the law of the land, of your US Constitution? Do you know? Do you know your law of the land? It's treaties. Treaties is the law of your land. But we have no treaty of annexation with the United States. Right? You can google it, and it'll come up with "joint resolution." A joint resolution is not the treaty of annexation. And that's basic law. I quit law school, or going to law school, because I don't need that, because that's a US piece of paper. And let me tell you, we will play your</p>	



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		<p>game right now. Did you know about a notice that was sent to the Supreme Court of the United States back in March? It said all public actors, which include the military, must uphold and defend their oath to the United States Constitution, or they will be jailed and all property seized. Better go check that out, because it was ruled nine to zero by your law. All of these verbal testimonies that we have given, consider that affidavits to the notice that was sent to SCOTUS. "No" means "no." You guys need to get out. We don't need you. We don't want you. You were never invited in the first place.</p>	
Teatuahere Teiti-Gierlach		<p>The military must deoccupy Kahuku, Mākua, and Poamoho immediately. The desecration of these lands are an atrocity. They must be returned to the Hawaiian people indefinitely. The US military has a responsibility to clean up their mess, vacate the land, and return all stolen 'āina to the rightful stewards of the land.</p>	Please see General Response.
D Momilani Thomas		<p>Finally. Aloha my kakou. I am born and raised from Oahu, Kalihi-Palama. Both my parents are Hawaiian by blood, even my two grandmothers. But I was a Navy wife for 17 years until my husband retired just one month shy before we, the Hawaii military community, found out our frickin' Navy lied to us. Covered it up for us. . . . . That's why my youngest son was sick since we moved back home and we're living Pearl City Peninsula for nine years to today. Anyways, that's not what I'm here to talk about. . . . . Sir, Colonel, where the hell is Pentagon? Because as far as I know, attending majority of our Navy Red Hill Pentagon military executive officials and their staff have been coming here to Oahu. But I know they're not going to do shit because they're brainwashed too. . . . . What fuels me is that, yes, I was poisoned, my family was poisoned, my home island Oahu was poisoned, all our drinking water is poisoned, and our state wants to go ahead and allow you folks to get the land titles? Bullshit. . . . . I don't trust our Department of Defense no more. I don't trust our military no more. And as far as I know, a lot of your soldiers, sir, when I was just an island girl growing up on this island during the old school era of 1990, I remember my homies at Schofield was the ones that taught me about our endangered native</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>snails. . . . . And I was brainwashed. I was Americanized growing up here just like many Hawaiians here on this island. Even though I went to Catholic Schools, we were still brainwashed. And I just want to tell you they were the ones that started to wake me up slowly about Makua Valley and about the bombing of Pohakuloa and Kahuku. They were pissed. . . . . They're like, how come, you Hawaiian girl, you local girl, you don't know this shit? I'm like, no. We were taught that we lavishly took America for Hawaii. That's what we were taught in school and by our elders. . . . . So anyways, in 2002 I attended a Hawaiian technology business school in my mid 20s under oha. We went to field trip at the Nanakuli Ka'ala Farms, and Uncle Butch was our host. And I remember I was sitting there, I heard booms. It sounded like a war going on. It sounded -- sounded like a war, sounded like fireworks. I was like what is that? They said that's Makua Valley being bombed. . . . . So this was the start of me learning to be decolonized slowly. That was 2002. I became a Navy wife by late 2004, early 2005. We moved to Yokosuka Navy Base, Japan by 2005. I was so homesick, and this is what a lot of our born and raised Hawaiians and born and raised locals have to understand. . . . . When they move away from Hawaii, they have to learn that when you become homesick it's actually our Kupuna, our ancestors, ke akua trying to tell us, hey, you need to wake up. It's time to start fighting -- -- and start fighting and speaking up for our home islands. And that's what I started to do in Japan by 2006. I wasn't brainwashed to just become a Navy wife and be lavished by you all and lavished by our senior leaderships seeing them brainwash us too. I was meant to learn the Navy politics, learn to have trust with our military community, and then learn the proper Hawaiian history to mend my homesickness and fight with the indigenous people of Japan and those in Okinawa and the people of Japan that wanted you all out. . . . . You -- that's your guys' host nation, Japan. They don't like you guys there. A lot of them don't like the gaijins there. And it hurts me as a Hawaiian because I know the Japanese people loves Hawaiians. . . . . And then we come back home after San Diego.</p>	

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		<p>After Japan, San Diego -- I'm sorry. I'm going to wrap it up. In 2015, we come back home. Sir, this is what I really need to tell you. I know you're just a colonel, which is equivalent to a captain in our Navy, but I need you to go up the chain of command and speak for your Army because I told this to Vice Admiral John Wade and Barnett, Commander for Navy Region Hawaii and Pearl Harbor back in January 2023. This shit was pissed. I was pissed. I was holding this in my fucking heart since 2015. . . . . Come home, I accompanied my, by then, back then, active duty Navy husband. He's retired now. And we went to the in-dock briefing to welcome hundreds of Navy sailors on southside of Pearl Harbor. . . . I was on a sideline, and this one woman from MFSC, Military Family Support Center, behind Ruby Tuesday's Moanalua Shopping Center, she tried to introduce Hawaii to all the room full of sailors and say, stay away from all the Hawaiians. Stay away from all the locals because they're angry at the monorail. They cause all this -- they cause all that road rage, and the Hawaiians don't like Americans, so they're equivalent to tourists. How do you think I felt about that bullshit? But, you know what, since the 1990s, I've been hearing from your soldiers, sir. You guys' been saying that bullshit on Schofield too. Brainwashing your own soldiers to fear our own people, born and raised from Hawaii. I did not become a Navy wife and then have my husband retire to just go ahead and continue being brainwashed as an American. Fuck no. . . . I listened to my kupunas. I listened to my dreams in my sleep. Queen Lili'uokalani came to my dreams too to tell me I'm going to be the voice one day while we were in Japan stationed there. And in Boom kanani Governor Linda Lingle -- Governor Linda Lingle and Representative John Ward -- Gene Ward came 2007 to our Yokosuka Navy Base Japan and asked for more military to come to Oahu. I was asked 24 hours prior to that -- sorry. I'm jumping all over the place. I was asked 24 hours prior to be the mistress of ceremony by a senior leadership that is an admiral, the Commander of Yokosuka Navy Base Japan in 2007. . . . I changed my frickin' script at the closing remarks. I did not like what Governor Linda Lingle, our Hawaii</p>	

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		<p>Governor, said to our Navy and the Japanese Navy, that she wants more military, more Navy, more Navy ships to come to here. So I stood there, and I told her -- I changed the whole script. I thought I was going to get kicked out. Nope. I was invited again in the future. . . . But, anyways, I said you're not going to do that to my home Oahu. We don't need no more traffic. We don't need no more populations, and we do not need no more disrespect of our military because I seen it on your guys' host nation of Japan. I've seen it in Okinawa, and I seen it growing up on this island. . . . You know a lot of your soldiers, just like a lot of our sailors disrespects this island, even the military families. They don't know how to take care of this island. And that is what your soldiers told me, sir. In 1990s to early 2000s, even when I was working at a no longer existent nightclub in early 2000s. I'm -- I'm about to wrap it up. And they all -- they were all my customers who all came back with PTSD from Afghanistan War and Iraq in 2005. But, anyways, they're the ones that told me. . . . They don't understand why, why the U.S. Government? Why our Department of Defense has so much clutch hold and lands of our Hawaiian people that got forcefully evicted. Even where I live, Pearl City Peninsula Navy Housing, formerly called Manana. I take care and I'm very territorial of that property for several years. I was given the greenlight by senior leaderships of Navy Region Hawaii. . . . Sir, I'm -- I'm dead serious. You need to start -- you need to go up that chain of command and you tell even that woman back that was sitting back there with the short hair. She was at the BLNR the last time back in May. She told our state that even if you folks land title this lands, you guys are not going to real estate. . . . That is some bullshit because I know for a fact my housing landlords for Navy Housing real estate, oh, actually it's the U.S. Government. They actually real estating (sic) those lands. And there is so much open lands, free lands, all over Pearl City Peninsula, all over all your military housings, 13 Navy housing neighborhoods, 2 Army housing neighbors, Hickam Joint Base Pearl Harbor, many Navy bases even the Army bases. You guys have too much frickin' land open unused. . . . For what? For you guys'</p>	

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		<p>entertainment? For your family members to come and lavish like tourists? That's fucking unfair, sir. My heart was broken moving back home in August 2015 to see that we have so many of our Native Hawaiians moving. There's more Hawaiians living on the continental United States which is Turtle Island. And we have many born and raised locals. I am on the brink of being houseless. No disrespect to my husband. We're going to be at peace, but we're about to be divorced. We are one of the many retired military families that are about to be divorced. And I am scared. I have never -- I have sacrificed myself as a military wife for 17 fucking years to go ahead and take care of my kids, be a homemaker to my sons, dance Hula the proper way, not the tourist way, to teach the Hawaiian history to the military community. That's what I did. Dancing Hula. And I'm sorry. I know. I'm going to wrap it, I promise you after this. And so it just breaks my heart, all right, coming back home. I'm woke up. I'm not an American no more. I'm decolonized, sir. No one taught me that. I did it on my own being homesickness, but coming back home to my own keiki ona aina, child of the land. It hurts me that a lot of my blood, my -- our Hawaiian people and our born and raised locals, just like me I'm about to be houseless. . . . . Because why? I survived off of my husband. I'm only learning to be independent now. I'm scared. I cannot even afford my home island anymore. But you guys have so much lands and you guys are being greedy like your forefathers in 1800s, asking for more lands. Just like how you guys evicted our Hawaiian people and our born raised local people off of Pearl City Peninsula, Pearl Harbor, and Hickam. Please hear my voice, sir. I speak as a prior Navy wife that was proud of our Navy, proud of our military before. Not no more.</p>	
D Momilani Thomas		<p>Aloha mai kakou. I am -- oh. To recap, I am Keiki O Ka 'Aina, and I am born and raised -- born 1976, born and raised Kalihi Palama. But for nine years, we lived on Pearl City Peninsula, Navy housing, as known as "Manana." And what Andre Perez shared, I -- I hear that every morning, every evening, from Pearl Harbor through our big speakers, the giant voice. Anyways, I came here to speak to that</p>	Please see General Response.

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		<p>camera, in hopes that the Pentagon, the Army, military executive officials, and your home state congressmen, senators, as well as the rest of the Army and Department of Defense that are here, their home state congress and senators, and then our Hawaiian Kingdom, Hawaii senators and congressmen, hears my voice and all of our voices. I came here to speak about the 'aina, the land.· So as I said -- recap -- two nights ago, I woke up, my first year within becoming a 17-year Navy wife, living on Japan, to -- on my own decolonizing, to understand the proper Hawaiian history.· Right? Well, what I know about the 'aina, the land, is -- especially where I live, Pearl City Peninsula -- every square foot -- that all the military bases, all the military occupies on, where all the Department of Defense is, where all of your Hawaii military community lives, where Kapilina Beach homes is, where Moanalua Shopping Center is, where the 13 Navy housing neighborhoods are, the two Army housing neighborhoods, et cetera, et cetera, et cetera -- everywhere those military bases are is contaminated with toxins. For 32 months now, 32 months, me and my ohana, in our home, do not use our tap water, which is the island water, Waiawa water.· It's because the pipes are contaminated with the jet fuel JP-5. I was the whistleblower for Pearl City Peninsula, December 8, 2021. If I had not -- if I had not spoken up, those senior leaderships, just like both of you, and especially this clown that I created, Admiral Paparo, that I created a big poster of him, and I held it high and proud outside of the federal court back in May, when we are right now in trial in court against the Navy, against the US government. I made this huge poster, and it says, "Ha. I jet-fueled Oahu, and got away with it."· The very morning I held up this high in May, he was being ranked, promoted, from Indo-PACOM, to now taking over the whole entire Pacific fleet.· And he's the one that covered this all up, and allowed me and my ohana, my home island, and many of our Hawaii military community, present and past, to be poisoned.· And right now, the Navy is winning. Anyways, what I came here to say about the 'aina - - sorry. [THE MODERATOR:· Please wrap it up.] I'm going to wrap it up. It's haunted.· I know all the paranormal stories of our military</p>	

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		<p>bases -- so does Sister Lori -- and especially with me taking care of the Pearl City Peninsula Navy housing for several years. I have helped even your soldiers get their home cleansed and blessed and understood why they're seeing Hawaiian spirits, because -- and I've seen them working on Hickam, Ford Island, and Pearl Harbor, recent years. Because they know your intentions, Pentagon, and sir and ma'am. They know your folks' intentions, the 'aina, because they're still buried, they're still laid to rest under all your folks' land, inside that toxic soil. So they come up to hunt, respectfully, to remind our Hawaii military community and you all, they're still around, and they want their lands back. They want it returned to the proper hands. Not to the state of Hawaii. Hell, no. Do not give it to the sleepwalking Hawaiians. Sorry. Hundreds of family out here. But for real, I was a sleepwalking Hawaiian, too, until I became a Navy wife. Please donate these lands back to the Hawaiian people here, especially -- just like the ones that take care of Makua Valley, just like the ones that have been protecting me with the Red Hill. Please donate it back to them. Because I know, in my heart, this is why I was led there through my dream, through my sleep, when we were stationed -- Navy stationed in San Diego. I'm going to wrap it up, Kehau. I'm sorry. When we were Navy stationed in San Diego, after Japan, I had a dream where my husband was illegible. He was worldwide deployable because he had open-heart surgery in January 2015 in San Diego. And the Navy said, "Wow, you're healing fast." And that's when the dreams came. Soon as his detailer told us, we can either get Europe, back to Japan, or Hawaii. And we got Hawaii for August 2015. And that's when the dreams came for me to move into Pearl City Peninsula. I mean, ironic. My Hawaiian middle name, named by my godmother, godfather, Hawaiian, "Momilani," which represents Pearl Harbor Bay, Pu'uloa, Wai Momi, and I live right along it. It's meant for me to take care of Pearl City Peninsula -- and not just that -- continue being the voice to the Hawaii military community, about the proper Hawaii history, about what the military continues to do to us, and how we cannot trust the tap water. So, sir, sorry. That's basically</p>	

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		<p>what I'm saying, Pentagon and you all. Just please donate back the lands. Never mind the state of Hawaii, please. I was meant to be a Navy wife, to be a voice for a reason. And I'm not going to give up. And I know this is it. This is also it, too. Maybe you folks will be the new torch for -- because the Navy is going to be next. They're going to be asking for all their lands, too. Even Kapukaki, Red Hill. I don't want any of them to own or land title any of these lands. So please donate it back. You guys got a lot of vacant lands. Mahalo nui.</p>	
Steven Thomas		<p>There's a lot less people here. How many people are here in opposition to these leases? That's -- yeah. I remember this the other night. There was a lot more people. I'm going to read this real quick. Aloha mai kakou. wau o Steven Thomas. I'm the grandson of Franklin William Thomas Sr., a former US Army soldier; and Emily Ka'ai, a direct descendant of King Liloa, through the lines of Paka'alana and Keawe and the progenitors of both royal houses of Kamehameha and Kalakaua. Make no mistake. I view America as a thief and a bully, which has had a parasitic impact on my ancestral homeland, infecting Hawaii with its attitude of entitlement and disrupting the natural order of the environment; when we, in contrast, view our very purpose as one to promote its health and ability to provide us with sustenance. I won't go into the environmental impacts. That's been said enough here. But these types of impacts, negative impacts on what western society calls "the environment," we, as Kanaka Maoli, refer to as the killing of our mother, all in the name of mission readiness. What is the mission? Kill the planet? What are you going to protect after that? Another thing that amazes me is that, on a continent with nearly 3 million square miles of land area, the Army cannot find enough space there to adequately maintain mission readiness. Oh, I'm sorry. All that land was stolen too. And since that's the case, let's be done with the portrayal of America as the good guys; and wear the cap of raping, murderous thieves proudly, just as proudly. Personally, I would rather you all just pack up your shit and get the fuck out of my house.</p>	Please see General Response.



Commenter	Submitted By	Comment	Response
Tiana Thorp		<p>To whomever this concerns, I am writing today to say no to the leases. As a Kanaka Maoli wahine completing her PhD on the continent, I say clearly that I and the lāhui do not consent to these leases. We oppose renewal of the leases. We oppose renewal of any lease in the future. This is our `āina and we will protect her. No leases on stolen land. Ua mau ke ea o ka `āina i ka pono. Mau a mau. Aloha mai, Tiana Tiana Noelani Thorp, EIT (she/her/hers) Distinguished Scholar Fellow   Graduate Research Assistant   University of Delaware Department of Civil and Environmental Engineering   College of Engineering — The University of Delaware in Newark, DE is a land-grant university located within the traditional homelands of the Nentengo or Nanticoke nation and Lēnapehòkink, the ancestral homelands of the Lenape Haki-nk or Lenni-Lenape nation. During the colonial era and early federal period, many were removed west and north, but some also remain among the continuing historical tribal communities of the region: The Nanticoke Lenni-Lenape Tribal Nation ( <a href="https://nlltribe.com/">https://nlltribe.com/</a> ); the Ramapough Lenape Nation ( <a href="https://ramapoughlenapenation.org/">https://ramapoughlenapenation.org/</a> ); and the Powhatan Renape Nation, The Nanticoke of Millsboro Delaware ( <a href="https://www.nanticokeindians.org/">https://www.nanticokeindians.org/</a> ), and the Lenape of Cheswold Delaware ( <a href="http://www.lenapeindiantribeofdelaware.com/">http://www.lenapeindiantribeofdelaware.com/</a> ).</p>	<p>Please see General Response.</p>
Lisa Toko-Ross		<p>I oppose the Army's attempt to retain its expiring 65 year leases. The amount that they pay is ridiculously cheap when the price of housing and land already excludes so many people (native and non-native). <u>They should pay the going corporate rate if they are to retain rights to the land.</u> While I believe that the US should have a military presence in the Pacific, I do not agree that they should pay less for it. There should be fairness, and there is more....way more....than enough resources in the military industrial complex to afford it.</p>	<p>The Army does not believe that the land can be leased for the same consideration it offered in 1964. The EIS has been revised in Sections 2.3.4, 3.1.3, 3.2 and Appendix G to clarify the assumption that a new lease or fee simple title would be negotiated at no less than 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> <p>Future lease conditions text in the Executive Summary, Chapter 2, and Appendix G has been</p>

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			revised to note that future lease conditions: * Would be similar to the current lease. * May include references to Federal and State regulations in existence at the time of a new lease. * May be revised or added by the State in a new lease, but that the EIS cannot precisely analyze potential impacts because those lease conditions are unknown.
kimberly tom		it is unnecessary to be training in kahuku. I oppose renewing the lease	Please see General Response.
Lili'u Tomasello		I am writing in opposition to the proposed continuation of the U.S Army's proposal to "retain up to approximately 6,322 acres of State-owned lands at KTA, Poamoho, and MMR on the island of O’ahu" which "would enable continued military use of the State-owned lands at these three installations on O’ahu". Clearly, the U.S. military apparatus has zero respect for the people of Hawai'i who have been forced to put up with decades of environmental degradation due to the DELIBERATE neglect of state and federal laws designed to hold the U.S. military accountable for their use of Hawaiian lands. Pohakuloa, Kapukaki (Red Hill), Makua Valley- the list goes on. In no other situation would a lessor be expected to grant a lessee use of a property when it is evident that the lessee has a record of not complying with the laws and regulations required, be it on the lands in question, or other lands the lessor has granted use of. This situation should be no different. The U.S. Army's leases of the lands in question should end permanently.	Please see General Response.
Melissa Tomlinson		The military must leave Hawai'i. You are illegally occupying lands there and as a "citizen" of so called u.s. we cannot support any military there. My comment is Re-Listen to every comment made by Kānaka Maoli at your hearing meetings. Your time is up. No renewed leases. You need to vacate the properties, period. The violence and harm you have caused is irredeemable. Your presence	Please see General Response.

Commenter	Submitted By	Comment	Response
Marti Townsend		<p>there has only brought shame to every American, whether they realize it or not. Go back to the continent! Remove your troops!</p> <p>Aloha. I'm Marti Townsend. Apologies for my back. And I am a haole settler in the occupied Kingdom of Hawaii. And I am very grateful for the opportunity to stand next to all of you in opposition to the US military occupation. So I -- well, first, I just want to thank you all, because these three days have really renewed my determination to stand up against this occupation. As many of you know, like, I -- I've spent a lot of time in these kind of meetings. And I tried really, really hard to convince the Navy to shut down the Red Hill fuel tanks before they poisoned people. If only they had listened, you know? They didn't. And 93,000 people were poisoned. And Oahu's aquifer is, for the foreseeable future, unusable. 'aue 'aue. And it breaks my heart. I'm very sorry. So anyway, I thought this was completely useless, but I came anyway because I needed to bear witness, and I'm so glad that I did. And I'm very, very grateful for all of you, for renewing that determination. We are the ones -- as people have said before, we are the ones that are going to take care of us. And I just want to plant this seed in your mind, similar to what Hanaloa said. Like, it's going to take us standing up -- and we know what it takes. Right? Kaho'olawe was no small feat. Right? So we know what it takes. And so I just -- and this is going to be a year-long, several-years-long process, and I want everyone to think about what they are willing to do to stand up to the US military. You've gotten a very, very strong message. Steve, Rachel, thank you very much for sitting through, stone faced, the entire time. Very impressed. I hope you -- you know, I hope you take a page or learn a lesson from the -- the very painful lessons the Navy learned. And please listen. If you only listen to us now -- we aren't going away. You heard generations of people. Right? Whole families, elders, makua, keiki, testifying, telling you they are not going away. The best thing you can do is to let go of Hawaii, clean up, and get out. That is the best thing that you can do. And whatever we can do to help you do that is where -- is where we are right now. Right? The -- the -- the level</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>of negotiations that we are on right now is what can we do to help you pack up and go? All right? We will help you. And -- and I just -- and I just want to, like, end on the note to make sure that everybody knows that, like, we -- we were the ones that took care of each other when the Navy poisoned our water. Right? And we are still the ones who are taking care of our own people. Right? We took care of each other after the wildfires. We took care of each other after the storms, during the pandemic. Like, we -- we don't need them, you know? They have done more to harm us, our health, our economy, our environment, everything. You know, what kind of economy are we going to have in Hawaii? To all of the -- the people out there who are watching, who are like, "Oh, well, the military has a role to play, you know. They're -- think of all the technology we could win from them," there is nothing they could give us that would justify the harm that they have caused. Don't fall for it. All the people watching on TV, don't fall for it. There is no grounds that justify the US military being here. Let them go. We are stronger when we rely on ourselves. Thank you very much.</p>	
<p>Laura Toyofuku-Aki</p>		<p>July 28, 2024                      To whom it may concern: The U.S. Army leases should not Be Renewed when they expire in 2029. The lands in Makua, Poamoho, and Kahuku should Be returned immediately to -remove harm to ‘āina (land), environment, <b>and the homes of dozens of endangered organisms. -the Land Lease inhibits kanaka access to important cultural practices</b> -the lease displaces, further displaces kānaka -the land was never [reliquished] to any foreign entity. Sincerely, Laura Toyofuku-Aki</p>	
<p>Joy Tshako</p>		<p>The U.S. army has been irresponsible with the Hawaiian lands it occupies, against the consent of the indigenous people. It has polluted the water, harmed native fauna, flora, and people. Military presence on Hawaiian lands must be rejected for the sake of preserving the natural resources and restoring the dignity of native peoples. I am against the renewal of this lease of Hawaiian lands for the US military.</p>	<p>Please see General Response.</p>

Commenter	Submitted By	Comment	Response
Donovan Tuisano		<p>Donovan Tuisano, longtime resident, Waianae, makaha. . . . . I'd just like to agree with everybody else in regards to the -- the land itself. I've been hearing and I seen when -- when the elders used to talk, they used to talk about how life is getting overpriced and -- and how everything else is changing. A little story about myself. I was homeless growing up. Until you're homeless you don't realize all the opportunities you have. The military gave me the opportunity to join the military and actually swear the oath to the constitution of the United States of America. Totally understand that. . . . . With people around and all these different cultures, you realize that everybody is holding on to their culture. But you can respect the worldwide requirement of if it's not the American people, it's going to be another country, and let's just say everything else shuts down. Makua shuts down. Kahuku shuts down. All these other installations shut down. Everybody else moves. All the forces leave the theater. . . . . And if you can visualize the understanding of the impact statement doing the research so that you can actually quantify extrapolating past the point of 10 to 15 years, what happens then? . . . . . If you can actually visualize the strategic location of Hawaii in where everyone is -- lady out here explained in regards to how important the rest of the islands are in the Pacific and Samoa. I'm -- I'm Samoan, Okinawan, and Irish, so, yeah, all the perimeter, the perimeter bloodlines. But if you look at my kids, Hawaiian. . . . . Four of the five are in the military forces, so understand, yeah, they swore the allegiance to the constitution of the United States as well. Yes. We all feel the pain of everybody else, but with the research you guys do and put into the EIS what that entails is longer research and explanation. . . . . Like the gentleman said, in regards to simplify it so I, myself, as a Waianae High Schol grad can actually read and understand what you're trying to say, so we don't have to talk like lawyers. . . . . But in the bigger picture, I -- I'm -- I'm pretty much understanding there's a lot of people out here that are hurt and that's the reason why. They're transparent. They're telling you exactly what needs to happen. Take those strategic level thinking</p>	Please see General Response.

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		<p>process and how it correlates with the middle of the Pacific, we're a proud people out here. And I owe that to understand how the community that I -- the homeless -- until you're homeless you don't realize, and then you realize how much you're sharing cheese with everybody else and, oh, everybody don't know where to go for -- use the bathroom. . . . . But knowing what I know and understanding how we can actually do more research for it, and the research that tells us when you close up these lands, tell us about the story as everything closes up. Makua closes, then Kahuku closes, and all these other ranges. . . . . Because as a soldier, I understand you have to have a place to -- to train and whatnot. But like sister said, you leave it worse than it was when you got there, and, yet, you have to enrich the cleanliness and all the -- the paradise that we have. Yeah. That's all I have to say. Thank you very much. I appreciate it.</p>	
Lei'ohu Turley		<p>Aloha,                      My name is Lei'ohu and I am in strong opposition of the renewal of military leases in Hawai'i. I believe that what the military has done to Kaho'olawe alone is enough to prove the irresponsibility of the US military in Hawai'i and highlights the need to discontinue their leasing of our land.                      Mahalo,                      Lei'ohu Turley</p>	Please see General Response.
Evan Uiagalelei		<p>Clean up the land the United States military used for training and put efforts to restoration. Being on islands with limited space and resources we have to use every piece sq foot of land with care and respect instead of destroying it. Crazy the U.S military paid \$1 for thousands of acres</p>	Please see General Response.
Erik Umenhofer		<p>The land belongs to the people of Hawaii, release the land and return it to the rightful owners. This land was stolen by the US Government / Military and must be returned.</p>	Please see General Response.
Sunny Unga		<p>I am writing to express my strong support for the NO ACTION alternative outlined in the Draft Environmental Impact Statement (EIS) for Army Training Land Retention at Kahuku Training Area (KTA), Kawaihoa-Poamoho Training Area (Poamoho), and Makua</p>	Please see General Response.

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		<p>Military Reservation (MMR) on the island of O'ahu. It is imperative that the United States Army honor its original agreement to return these lands in their original condition, allowing the leases to expire and facilitating the return, cleanup, and restoration of these areas. For over 80 years, since World War II, the Army has utilized these lands, resulting in significant environmental damage. The U.S. Military has a history of environmental negligence in Hawai'i, as demonstrated by the contamination of O'ahu's largest water aquifer with jet fuel and harmful chemicals at Kapukaki. This negligence is further highlighted by the military's status as one of the largest consumers of fossil fuels and contributors to greenhouse gas emissions, which exacerbate climate change. With 34 superfund sites across Hawai'i, including Pohakuloa and Kaho'olawe, left not remediated by the military, serious concerns about its environmental stewardship arise.</p>	
Sunny Unga		<p>The Army's chronic failure to properly manage and clean up existing sites underscores the critical importance of not granting further land retention. These lands are home to many endangered and threatened species, such as the apapane and i'iwi birds, which are crucial to the health of our ecosystems. Additionally, the Army has desecrated many Hawaiian burials, culturally significant sites, and natural landscapes. It is essential that the Army conducts a comprehensive evaluation of each property's current condition, removing unexploded ordnance and rehabilitating affected areas promptly.</p>	<p>Section 3.6.1 and Appendix J have been revised to add the definition of operational ranges. Current management measures to mitigate potential impacts from hazardous substances and hazardous wastes are discussed in Section 3.6.5.</p> <p>Lease compliance actions and cleanup and restoration activities that would occur after lease expiration are discussed in Section 4.2.4.</p> <p>Sections 3.3.5 and 3.4.5 discuss impacts to biological, and historic and cultural resources, respectively, from training activities and existing management measures the Army follows to protect these resources.</p>
Sunny Unga		<p>In addition, the Army has failed to demonstrate that they are able to be good neighbors. Despite complaints and reports of low flying aircrafts and noise, the Army has failed to adequately address these issues as these are ongoing issues we continue to face with low</p>	<p>Monthly training advisories are published to alert the public and neighbors of upcoming training activities that are louder in nature and may be heard outside the military installation. In addition to these notifications, USAG-HI has established</p>

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		<p>flying aircrafts shaking our homes and waking up families with the loud noises it produces.</p>	<p>internal policies and standard operating procedures in an effort to minimize training noise and its impact on the community.</p> <p>To alert USAG-HI of a specific noise complaint, please call the Community Concern Line at (808) 787-1528 or send an email to <a href="mailto:usag.hawaii.comrel@army.mil">usag.hawaii.comrel@army.mil</a>.</p>
Sunny Unga		<p>In conclusion, I strongly advocate for the return of all Army-controlled lands at KTA, Poamoho, and MMR under the no action alternative. We must reduce the military presence on our islands, emphasizing stewardship and sustainability for future generations. The no action alternative must include the Army's commitment to comprehensive planning, execution, and funding for the cleanup and restoration of returned lands. This effort must address cumulative environmental impacts, including those on adjacent federal lands controlled by the military, reforestation needs, debris removal, thorough toxin and pollutant cleanup, and must include clear timelines and methods for remediation. Establishing robust enforcement mechanisms, such as regular progress reports, independent oversight, and community involvement in monitoring, is essential. The state must hold the military accountable for all actions and cleanup costs, even after lease expirations. Most importantly, community voices must be central in transparent decision-making about the future use of these lands.</p>	<p>Section 2.5 of the Final EIS has been revised for the preferred alternative, which includes Alternative 2 for KTA (retaining Tract A-1 only) and the No Action Alternative for Poamoho and MMR, i.e., the Army not retaining the State-owned lands at Poamoho or MMR.</p> <p>Sections 2.1, 3.6 and 4.2.4 have been revised to include a summary that the Army would follow the CERCLA process in accordance with applicable DoD and Army regulations. The CERCLA process includes phases such as preliminary assessment/site inspection, remedial investigation/feasibility study, remedial design/remedial action, and post construction completion.</p> <p>Future State use of the lands not retained by the Army is beyond the scope of this EIS.</p>
Paolo Vidali		<p>I support Alternative 3 which returns the maximum amount of land to the state so that environmental remediation and recovery can occur. At minimum, the policy of paltry <u>\$1 leases should end, with an appropriate market value paid to the state</u> to assist other public land use and conservation efforts.</p>	<p>Section 3.12.5, Table 3-58, and Appendix L describe public engagement efforts involving the Native Hawaiian Community; and Section 3.5.5.3 identifies potential mitigation measures to improve public engagement efforts around cultural access programs for land retained.</p>



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Imehana Villas-Boas		I am against the renewal of leases to the US military on Native Hawaiian land. I hope to see indigenous land be given back to its people.	Please see General Response.
Gerhard Waclena		Being a frequent visitor to the Hawaiian islands, i feel for the natives of Hawaii. The people want their land back ( as it was promised to them after the war ). i am sure that the US Army can find XX reasons why they need the training grounds - however, it is time to return what was promised to the people of Hawaii.	Please see General Response.
Kaukaohu Wahilani		Aloha mai kakou. O Kaukaohu Wahilani, no Puea mai au. That's Waianae valley. I just wanted to come up. But first of all, I want to give nui ke aloha to our nau po'o (phonetic) Kahuku, from our family in Kahuku for showing up. And we came here from Waianae for Kahuku them. Because when things go down in Makua, Kahuku going to come and kakou us. Kahuku gonna be there with us. Colonel Steve and then Colonel Rachel, I'm gonna to see you at the neighborhood board, because I sit on the Waianae neighborhood board. You guys cycle out every time. This gonna be - - you probably gonna be, like, my eighth colonel since I've been on the board. But I just wanted to share in more the words of our Queen Lili'uokalani: Never fear to act because he's -- never cease to act because you fear you may fail. So all of us over here, we standing in that. And the truth, Colonel Steve and Colonel Rachel, you guys can learn all our history from Kehau. She knows exactly what we've been talking about. Tita get five freaking PhDs. She can freaking tell you guys the truth. Okay. So, you know -- so the indoctrination of us, of us kanaka, like Dr. Keanu Sai said, the denationalization was pledging allegiance every day. I've been out of school 40 years, and I can still recite that. Mahalo ke akua, my three boys, they was all homeschool. They don't offer to say that. They don't offer sing my country tis of thee. Whose country? This is our country. If there was a treaty of annexation, we wouldn't even be here grumbling to you guys. But the bottom line, there was no treaty of annexation. Joint resolution no hold freaking water. And that's the truth. And then at the ending of the pledge of allegiance, with liberty and justice for all. Where the liberty and	Please see General Response.

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		<p>justice for us? Huh? You know, I'm not anti-American. I'm just pro-kanaka iwi. You know, you guys -- you guys own constitution. You guys own constitution. Get some maika'i and pono freaking things inside here. But just like you guys don't adhere to that. So Colonel Steven -- and I heard the Pentagon, they watching. You guys get all of us. What his name? You guys got everybody's name. We'll see you guys tomorrow night. Yeah. In the words of James Kaulia: A hiki i ke aloha 'āina hope loa , until the last aloha aina. Yeah. This is our country. If you guys are true, honest Americans, you guys would do you guys fiducial duties. You guys should actually freaking go to General Hara. Yeah, I don't know if you guys -- I don't know if you guys got that letter from Keanu Sai that was forcing General Hara by July 31st for do his due diligence. Because under the laws of -- international laws of occupation, the laws got -- the laws to be adhered here is the Hawaiian kingdom laws, not U.S.. Constitutional law only, not U.S. communal law. It's the Hawaiian Kingdom law. So if you guys truly are truly, yeah, honest Americans, then go take some advice from Kehau. She can freaking share all the information. And all this information you guys got from all of us from last night, tonight, tomorrow night, even two years, three years ago during COVID, those two nights, 100 percent in opposition. And you guys still get the [Japanese/Hawaiian Pidgin] Damashi. You guys jiggling over here. So we see you guys tomorrow. Aloha.</p>	
<p>Kaukaohu Wahilani</p>		<p>Aloha mai kakou. One of the immortal words of our queen, Liliuokalani, she said, "The voices of the people. The voice of God." In the battle of Kuamo'o Bay, when the forces of Liholiho was battling against Kekuaokalani because the ai kapu was broken, kanaka was fighting kanaka. Kekua-o-kalani was mortally injured, and his mana wahine high chief, his manono, was also mortally injured. But she has stated malama ko aloha malama ko aloha, to have love for one another. And in some way, shape, size, or form, we still get love for you guys, too, Colonel Rachel, Colonel Steve, even you, Tita Kehau. However, wrong -- crime has been committed, being committed every day. So with that being said,</p>	<p>Please see General Response.</p>

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		we're going to close this out. And I'm going to call up Kumu Hina for Pule.	
Kaukaohu Wahilani		Aloha mai kakou. One of the immortal words of our queen, Liliuokalani, she said, "The voices of the people. The voice of God." In the battle of Kuamo'o Bay, when the forces of Liholiho was battling against Kekuaokalani because the ai kapu was broken, kanaka was fighting kanaka. Kekua-o-kalani was mortally injured, and his mana wahine high chief, his manono, was also mortally injured. But she has stated malama ko aloha malama ko aloha, to have love for one another. And in some way, shape, size, or form, we still get love for you guys, too, Colonel Rachel, Colonel Steve, even you, Tita Kehau. However, wrong -- crime has been committed, being committed every day. So with that being said, we're going to close this out. And I'm going to call up Kumu Hina for Pule.	Please see General Response.
Kaukaohu Wahilani		E kalamai kehau, E kalamai kehau. I'm going to try to keep it to two minutes. E kalamai lahui. I got to face my kua back to everybody over here. No, but I like --I talk to Steve. Thank you for being here, brother. But the only way you guys going to -- we going to take you guys serious, get the generals over here. Get the generals over here. Because what -- what rank you, brother? You're a colonel. All right. We deal with colonels. You guys cycle out every four years. Bring the generals here. . . . And before I -- my name is Kaukaohu Wahilani. He Waianae au, mau a mau, mau a mau. Lifelong resident over here. Before I say anything, I'm in total opposition of any extension. And like what Uncle Sparky said, you guys never leave that fourth option, which was for get out. Why we got to wait nā po'e o Waianae another 65 years? . . . First of all, like mahalo nui loa to Malama Makua, they're both Malama ma kua organizations that we work hard. This is 21 years stop firing, like firing in Makua. So mahalo nui loa for them. . . . I also want to say raise your hand if you're over here in opposition. Somebody take a picture. Somebody take a picture. . . . Steve, take this -- you -- you got a phone. Steve, take this picture and send them back to the generals. . . . Who's over here in opposition? Raise their	Please see General Response.

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		<p>hands. Okay. He got everybody. Thank you, Steve. . . . And the difference, we -- we also got to address the guys that freaking bankrolling the United States Military conflicts. Yeah. Like sister said earlier, January 16, 1893, the years since Boston was at Pohakuloa. Then down here to Honolulu Harbor January 17, 1893. . . . I want to talk about the elephant in the room. You guys already know because you guys -- the military got -- got enough information by Dr. Keanu Sai, who -- who went before the Army some years back. So you guys know about the illegal occupation, right? Everybody know. . . . There's no Treaty of Annexation. It failed twice. Joint resolution is only on the metes and bounds of the United States of America. We 2,500 miles away. You guys came like a bad cancer, never left. . . . And we, Steve, me as well as every Kanaka Oihi over here and as well as every -- every Hawaiian citizen and no more koko that love Hawaii, we are here to let you know as I'm saying from our brothers and sisters, our Native Americans, respect our existence or expect our resistance. . . . So I want you to go back and take -- take it back to the generals. And I was kind of appalled coming over here. You guys done set me off already. Come over here I see barriers already. Like who does that? It's our aina. We just saw you come in and we get barriers of oh, no, the military, they over here already. . . . But, Steve, look under the Treaty of Annexation. That's -- that's the one. That's the one key. There's no Treaty of Annexation. What is a Treaty of Annexation? Kehau, you know, right? That's a binding legal freaking contract between two countries. It failed. It failed twice. The first time President Grover Cleveland wouldn't stop them and then send James Blunt to come over here for investigate, and he found that it was illegal. . . . Why? Because in November 20, 1843, our country, the Hawaiian Kingdom, was recognized. What's called the Franklo American -- Franklo Saction -- okay. What? Anglo-Franco Proclamation. Yeah, that Queen Victoria of England and King Louie Phillipe of France signed. We was the first non-European country recognized internationally. The first country of color. . . . So come back with the fourth option. Put all the first</p>	

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		<p>three options on the side and just ---just get out of here.· Yeah.· I mean, you know, we can talk as humans, but you, you not from here, brother.· The difference between us is Kanaka Oiwi and you guys.· The aina is our kupuna.· Yeah.· We love the aina.· . . . So with that being said, you seen everybody is in opposition.· Same like in 2020 when -- Kahao, you was here, right?· We had two nights. Hundred percent opposition.· Nobody was for the extension of the lease. . . . So, Steve, tomorrow night in Kahuku, I hope my Kahuku ohana watching.· I hope the generals come and then Thursday night, I hope the general is over there too.· And we're going to show up over there too.</p>	
KauKa‘ohuokalani Wahilani	Alaka‘i Hui Ku Like Kakou	<p>Aloha my name is KauKa‘ohuokalani Wahilani and lifelong Wai‘anae resident. First and foremost I am in 100% opposition against any land extension of Makua, Kahuku, Poamoho, Pohakuloa!!! This is my written testimony I’ve given a verbal testimony as well. However I had more to say and that was on the behalf of the more than 300 families that called Makua their home from the 15th Century. I am on behalf of them that were illegally taken from Ancestral lands. In the word of our Beloved Queen Liliuokalani which stated "Never cease to act because you fear you may fail" in the words of James Kaulia "A Hikii kealoha Aina Hope loa" until the last Aloha Aina in my words "Do what is right!!!"</p>	Please see General Response.
Amy Wake		<p>Aloha.· My name is Amy Wake I'm a United Methodist pastor, born and raised here in Aiea on Oahu.· My church is in the process of repentance for our part in the overthrow and the illegal annexation of Hawaii.· And sometimes repentance hurts.· It's not going to be easy, but it can be easy for you. . . . 60,000 acres is nothing compared to the rest of the land that you have here in Hawaii.· But it can mean the mean the world to the people here in Hawaii.· I have served churches in Pearl City and Downtown Honolulu and at - - now, out in waialae and everywhere I go homelessness and poverty is a significant problem that the churches try to repair and - - and -- and make new. To bring an end to the suffering of people it takes a lot of effort.· It takes a lot of time, and it takes a lot of commitment, and that is what we're asking from the military.·</p>	Please see General Response.

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		<p>60,000 acres will not hurt you, but it will help us, and it will help Hawaii to be a new place. . . . . When I was growing up here in Hawaii I always thought you just couldn't help that the cost of living was so high. You couldn't help that there was not enough land for everybody to live on. You couldn't help that there was homelessness. But we know that that's not true. There's plenty of land. . . . . God created this world with enough abundance for all of creation, human, and animal, and nature. We just have to be willing to make the step to share it, to do justice to our world. Thank you.</p>	
<p>Pastor Amy Chieko Wake</p>	<p>Hawaii Acts of Repentance Task Force, California-Pacific Conference of the United Methodist Church</p>	<p>Date: August 1, 2024                      From: Rev. Amy Chieko Wake, Hawaii Acts of Repentance Task Force Chair, California-Pacific Conference of the United Methodist Church                      “Be fair-minded and just. Do what is right! Help those who have been robbed” Jeremiah 22:3                      On April 29, 2024, the United Methodist Church General Conference approved a formal apology for the part played by our denomination in the illegal overthrow of the Kingdom of Hawaii in 1893. Specifically, Rev Harcourt W. Peck, who became a pastor of the First Methodist Episcopal Church in Honolulu, was one of the riflemen and aide to the commander of the illegal overthrow. This official apology is not an ending, but a beginning. The next step is to continue to build relationships with Hawaiians and listen to them so they can guide us on how to make this apology meaningful beyond words into action, advocacy and ally-ship. One such relevant and timely opportunity to advocate for kānaka maoli is the issue of whether the state of Hawaii should grant new leases to the Army for the 6,322 acres listed in the draft Environmental Impact Statement (EIS). The old leases, for \$1 each, which began August 7, 1964 are ending on August 16, 2029. The Army has expressed the desire to keep control of these lands as training areas and seeks new leases with the state of Hawaii.                      The lands that are the subject of the leases are Crown Lands, which are defined under the Constitution of the Kingdom of Hawaii and</p>	<p>Please see General Response.</p>

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		<p>were owned by the King Kamehameha III and "henceforth inalienable and shall descend to the heirs and successors of the Hawaiian Crown forever." However, after the illegal overthrow, the Crown Lands were seized by the new illegal self-proclaimed "Republic of Hawaii" government, followed by an "annexation" by the United States.</p> <p>This land confiscation was both a legal and a moral injustice against the subjects of the Kingdom of Hawaii. The historical facts show that there exists no signed treaty of annexation and that the state does not hold clear, legal title to these lands and therefore is not in a position to lease this land to the Army.</p> <p>We are advocating for no new leases being offered to the Army. The Makua Military Reservation (MMR) in Wai’anae is especially fragile and culturally sensitive, and it is documented in the Army’s own draft EIS that this land contains petroglyphs, walls, mounds, terraces and lithic scatter and possible human burials. The MMR lease should not be renewed and the Army should be held accountable for thoroughly cleaning up all of the contaminants, including unexploded ordnances on that land, subject to verification by an independent environmental organization, before returning it to the k̄naka maoli. All three of the parcels subject to this draft EIS should be returned k̄naka maoli after a thorough and verified clean-up by the Army. "In the past, God didn’t judge people for what they didn’t know. But now he commands all people everywhere to turn away from their sins. Acts 17:30</p> <p>We cannot change the past, but we can change the present and inform the future. We are not the people we were 65 years ago; we have more knowledge and more understanding, and realize there is a difference between "dominion" over the land meaning stewardship and creation care verses and "domination" interpreted as extractive and exploitive actions against the ‘aina. The United Methodist Book of Discipline, our governing document, ¶160 states, "All creation is the Lord’s, and we are responsible for the ways in which we use and abuse it. Water air, soil, minerals, energy resources, plants, animal life and space are to be valued and</p>	

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		conserved because they are God’s creation and not solely because they are useful to human beings.”	
Pastor Amy Chieko Wake	Hawaii Acts of Repentance Task Force, California-Pacific Conference of the United Methodist Church	In regards to the draft EIS itself, it fails to recognize what other land the U.S. Army has at its disposal, whether federal land or any other land, to use for training. By not including this information, the draft EIS seems to imply that the leasing of these 6,322 acres is more critical to U.S. Army readiness than it actually is in reality. “The U.S. military has a global real estate portfolio valued at around \$749 billion and 26.9 million acres” and “98% of that land is stateside.” [1 Koop, Avery. Visual Capitalist.com <a href="https://www.visualcapitalist.com/how-much-land-does-the-u-s-military-control-in-each-state/">https://www.visualcapitalist.com/how-much-land-does-the-u-s-military-control-in-each-state/</a> 27 July 2022] We are requesting the total number of acres, listed by state on the continental United States, as well as the location and number of acres in Guam, Marianna Islands, American Samoa, and Puerto Rico that the Army can use for training to give context to this issue.	Section 2.3 discusses Alternative 9: No retention and move all MMR training elsewhere; the Army considered this alternative, but it was not carried forward for analysis because it did not meet the purpose and need described in Chapter 1 and screening criteria in Section 2.3.1. Table 2-6 in the EIS provides a comparison of alternatives against the screening criteria. The request for a listing of all lands in the U.S. owned by the U.S. military is beyond the scope of this EIS.
Alexander Wallace		Return the land to the Hawaiian people.	Please see General Response.
Alecia Wallingford		Do not renew the military land lease on Oahu. The military should not be occupying Hawaiian land and should give this land back to native Hawaiians. Put an end to the environmental degradation due to occupation by the military. Thank you.	Please see General Response.
Vanessa Waneka		To the people stealing native land doesn't stop and think about the harm they are causing. The habitats they are hurting and the people of the land. To take over someone's home is cruel. CANCELRIMPAC.	Please see General Response.
Julie Warech		Aloha mai kakou. My name is Julie Warech. I'm a member of Jewish Voice for Peace Hawaii and have lived in Hawaii for the last 10 years. I'm here as a descendant of peoples who were forcibly removed from their land, survivors of attempted extermination, in steadfast solidarity with Kanaka Maoli, to demand all lands being occupied by the military be returned to Hawaiians and that no leases be renewed in 2029. The entire time your business in Hawaii has been about what you can take and take and take, what you can exploit, what you can extract, and never about what you can help, what you can nurture, what you can leave better than you found it. And that's because the culture of the military is the culture	Please see General Response.



Commenter	Submitted By	Comment	Response
		<p>of Western imperialism. It is the culture that is quite literally killing us all around the globe. So I want to take a second to talk about solidarity. Your military is in solidarity with France, a country currently murdering people in Kanaky and thwarting all aspects of their indigenous sovereignty. And why? For nickel, for strategic interests in the Pacific. Your military is in solidarity with the Indonesian military, who has killed over 500,000 people in West Papua since 1969. And for what? Gold, copper, land. Your military is in solidarity with Israel. Estimates are currently that 186,000 Palestinians will be the death toll if the war stopped today - if the genocide stopped today. U.S., us, everyone in this room has watched for nine straight months as children have lost limbs, babies have had their heads blown off, children have been starved to death, people have been burned alive in tents in in safe zones, hundreds of reporters have been massacred to hide this reality, all made directly possible by the U.S. government and military and the testing of weapons in Hawaii that have been sent to Israel. What do they all have in common? Money, natural resources, and geopolitics meaning more to you than human rights, than human life, than human dignity, more than the health of the planet and her agency, her protection. More than protecting all the vital natural resources and making all life possible, you try to render life impossible. And so we will never be in solidarity with you. We will resist you and everything you stand for until our dying breaths -- a few more minutes -- or one minute. And you want to sit here and tell us you care about safety, about human life, that any of this is for the people. Your job is solely to protect a world of exploitation, greed, power, and wealth for a select few. And you're willing to kill literally anyone who gets in the way, destroy the entire planet for infinite conquest. That's who you are to us. We, the people, we stand in unbreakable solidarity with each other against oppression and those who are settlers done in unbreakable solidarity with Kanaka Maoli, unbreakable solidarity with their epistemologies, their leadership, and their visions of the future. They belong to this aina as the aina belongs to them. And you have done enough</p>	

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		<p>without their consent, with brutal force. Hawaiians never gave the consent for this LEED land to be taken, and you have lied time and again, showing you cannot be trusted. You will never be good stewards of land because you are only death. You are only destruction. The people will always win, and life will always win. Thank you.</p>	
Michael Waters		<p>Oppose any lease extensions for US Military in Hawaii. All lands should be returned as soon as possible. Michael Waters</p>	<p>Please see General Response.</p>
Hema Watson		<p>Aloha mai kakou. Aohemakealohanuikaiamoia Watson ko’u inoa. My mother is Nai’a Lewis. My father is Merlakiki (phonetic) Watson. I come from Kulioulou . I am against any extension of any military lease on Oahu or in Hawaii. And these are some of the reasons why I say that. When I went to Kaho’olawe in 2022, I saw that aina. It was ripped apart, gutted. And when I saw that land, all I knew inside of my na au was pain. I knew deep in my na au that it was wrong. And when I hear the lies, blatant lies, and disregard for our land, it makes me sick. I laugh, laugh at you when I hear you speak about wanting to take care of this land and conservation and otherwise, when you yourselves admit that your presence here will have significant adverse impact. Hell, I don't even have to listen to you. I can just turn my ear to the people of Kahuku when they tell you the same thing. When I hear the report from the Committee of Missing and Murdered Indigenous Women that showed me that the average person to be a victim of sex trafficking and assault was a 15-year-old Hawaiian girl that lives near a military base, I felt sick. I have a Kanaka mother. I have a Kanaka sister. I have a Kanaka lover. And I know every day that the reality of that report does not stop just because those people are close to me. They are in danger because of you. And that's why I say no more leases, no more backhanded deals, no more occupation. E ola ka lāhui!</p>	<p>Please see General Response.</p>
Dusty Weber		<p>I deeply oppose the US Army or any other military branch having this or any other additional native Hawaiian lands for continued colonial military expansion. Stop using my tax dollars to colonize Hawaii. Return Hawaii to the Hawaiians and get the Army out of Hawaii.</p>	<p>Please see General Response.</p>

Commenter	Submitted By	Comment	Response
Valerie Weiss		<p>I do not support any further land leasing to the Military. They have served us poorly by contaminating our land and our ocean and then lying about the worst of it. We have unexploded ordinance unaccounted for on both the land and in our ocean. We have lead left at shooting ranges. We have PFAS spilled on Kauai and at Red Hill. And more. The military has been a bad tenant not just in the State of Hawaii, but many other locations as well. They are known for polluting, purposely and accidentally.</p> <p>While stating this it refers to all military branches including the Army, but as we know the worst was the Navy. Now we cannot trust any of our military branches.</p>	Please see General Response.
Erin West		<p>GET OFF HAWAIIAN LAND.  USA are not stewards of the land, but thieves and destroyers. We invaded a sovereign nation and have been profiting off its suffering and the death and disease of its people for too long. GIVE THE LAND BACK. It does not belong to the USA.</p>	Please see General Response.
Shawn White		<p>In response to the U.S. Army currently accepting written comments, through August 7, on a draft EIS for its “retention” of “ceded” lands on O‘ahu; lands it has leased from the state for the last six decades. Public comments regarding the need to more fully assess the climate impacts of such “retention” could force a conversation on what it will truly take to ensure our long-term security, and survival. For example, the EIS is required to assess the direct, indirect, secondary, and cumulative climate-related impacts of the Army’s future use of the leased O‘ahu lands. These arguably include impacts associated with the larger strategy of Indo-Pacific “deterrence” for which Army Gen. Charles Flynn claims the lands are essential. Such impacts would include: the cumulative reduction of our long-term food security, by the occupation and unremediated contamination of historically abundant agricultural lands which, in turn, contributes to Hawai‘i’s climate-vulnerable dependence on imported food; the continued disconnection from and harm to ‘āina that disproportionately affects Native Hawaiian health and wellbeing which will be increasingly challenged by climate destabilization; and the carbon footprint and impacts of the</p>	<p>The Proposed Action is a real estate action (i.e., administrative action), and would not alter or increase from the current state of air emissions for the three Army training areas containing State-owned lands on O‘ahu. The Army has taken and will continue to take both emissions and climate change into account in all aspects of mission readiness and utilize management measures wherever and whenever possible. The Army’s Climate Change Strategy Implementation Plan of 2022 offers a blueprint for the U.S. Army’s enterprise-wide climate change adaptation and management measures through FY27. Text has been added to Section 3.7 explaining the U.S. Army’s commitment to reducing emissions and maintaining air quality standards per the goals and specific actions set forth in the 2022 Plan.</p>

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		<p>national and multinational exercises that would depend upon the retention of these lands, as well as that of the United States’ “rivals” who will only increase their own military carbon footprints to “deter” the U.S. The current draft EIS fails to evaluate these concerns. Cumulative impacts on food security and Native Hawaiian health and wellbeing are not assessed in the broader context of climate destabilization – which the Department of Defense (DoD) has an immense role in accelerating. Meanwhile, greenhouse gas emissions (GHG) are vaguely and simply described in the EIS as the same as those associated with current training activities. There is no discussion of the overall impact of GHG emissions over time and on adjacent areas, or of the cumulative, indirect, and secondary GHG impacts of the larger deterrence strategies that rely on the continued military use of these lands. Critically, by neglecting to adequately evaluate these impacts, the EIS also fails to describe how they could be mitigated, especially with the DoD’s vast resources and status as the largest institutional consumer of fossil fuels. Instead, some of the many possible mitigation measures that could and should be discussed include: 1. The development and widespread sharing of decarbonization technology, supportive infrastructure, and other resources with other militaries and civilian populations; 2. Concrete benchmarks for the reduction of carbon-intensive training and other activities to the bare minimum, and for the restoration and return of lands and waters to Indigenous stewardship; and 3. The continual tracking of the full range of threats the climate crisis poses to the United States and the planet.* These are valid issues that threaten the wellbeing of all people living in Hawai’i, including the military, as well as visitors. Climate destabilization is a direct threat on the economic base of Hawai’i as well as negatively impacting food security. These points are critical for our host culture, as Native Hawaiian practices are sustainable and regenerative, but also to the whole of the U.S. as examples of how to maintain economies and adapt to our changing global environment. Thank you, Shawn M White *Copied with</p>	

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		<p>permission of author, Wayne Tanaka, from Ka Wai Oha, 1 August 2024.</p>	
<p>Sec. Will Whitewash</p>		<p>Good evening, my fellow Americans. My name is Secretary Will Whitewash, U.S. Navy. I'm glad to know you. I came out here to help y'all, because it seems we might be losing the battle for hearts and minds in Hawaii. And I am worried. In the Navy, we had to double our PR budget to counter these Cancel RIMPAC protests that have been absolutely huge. I'm here to counter the negativity, because I know you have your hands full. I'm trying to convince these good people in Hawaii that the leases should be extended. They don't seem to understand how necessary these leases are for America to remain number one. I tried to explain to them that as a superpower, we have created four superfund sites right here in Hawaii and over 1,300 superfund sites in the U.S. over 600 more throughout the world. But they say: We don't want that, Secretary Whitewash. You need to clean up those hazardous waste sites here and everywhere. In our culture, we respect the land and the water. We want to avoid another catastrophe, like Red Hill. I tried to explain to them the importance of American freedom and the permanent war agenda. They say: We don't want that, Secretary Whitewash. We want to live in peace. We want to protect Oceania, where our ancestors have lived for millennia. I try to explain to them that nothing will cure your depression, your anxiety, or your erectile dysfunction, like destroying an entire ecosystem. They say: We don't want that, Secretary Whitewash. We want green jobs that promote justice and equality between the genders and the cultures. You know, these cockamamie ideas, they're getting them from books, from TikTok, and from Hawaiian studies. I think that y'all have to do is to include some of the cultural mumbo jumbo in your message, okay. That way, everyone will see how sincere the military is in our commitment to the greenwashing program. My suggestion for your next campaign -- -- U.S. Army bombing Hawaiian land in the spirit of aloha, or maybe U.S. Army, we're here to malama your aina. Thank you for your time. Please find me at hashtag</p>	<p>Please see General Response.</p>

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		WillWhitewash. God bless you all, and God bless the United States of America.	
Sec. Will Whitewash		Aloha, wai ewa. This is for you. Good evening, my fellow Americans. My name is Secretary Will Whitewash. It's good to know you. You know, I've been working so hard with the RIMPAC festivities. It's been fantastic working with our international partners on the permanent war agenda. You know, the only thing that's been amiss with RIMPAC this year is that our good friends from Israel have been here. And I tell you, we've been doing everything we can to show them good hospitality. But, you know, in Washington DC, they're used to seeing the American flag and the Israeli flag side by side everywhere. They don't see that here in Hawaii. And I know we're here to talk about the leases, so I have a request. You know, if you're an American trying to pronounce Kauai Loa Poamoho -- we can't pronounce that kind of thing. That's an impossible thing to say. So, assuming that we get these leases back -- and of course, that's what we want -- we suggest a new name for these lands. How about "New Israel"? New Israel. Just like there's New York, New Mexico, whatever it is. Let's rename it "Israel," so that when Israel is here, we can teach them how to bomb the land, in the spirit of aloha. You know, whether they want to bomb a hospital, or bomb a university, or bomb a refugee camp, right, we can teach them how to do that in the spirit of malama 'aina. That's what this place is all about. I know my time is limited. The military brings so many economic benefits to this community, especially the small mom and pops, like Boeing, like Raytheon, like Lockheed. And I'm so pleased to have my good friend here, Jennifer Lockheed, to speak right after me. But God bless each and every one of you, and God bless the United States of America.	Please see General Response.
Shannom Wianecki		Aloha, Please do not renew the US military's leases on state land. Let the 6,000+ acres revert back to the state—better yet, return this land to the Hawaiian people from whom it was stolen. Ua mau ke ea o ka ‘Āina i ka pono.	Please see General Response.

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Tiana Wilbur		<p>Mahalo, Shannon Wianecki</p> <p>Mahalo for allowing us to speak. I actually wrote a written testimony and I want to say mahalo, Colonel, for being here in this space. And thank you for the leadership meeting that you held with -- with leaders of the community and of our legislators. We didn't have representation from our own local on either level at that meeting, but I did appreciate that you allowed me to invite Uncle William Aila to the meeting because he got to shed a lot of the 'ike and mana'o of the area and the space. And he -- he reiterated a lot of it tonight. . . . And two things that I want to point out clearly on -- and so the people understand and realize also that with the EIS like he said it is, it is flawed and also he brought up the Chevron deference, which is a statement to say that the lease cannot be renewed unless it's by the people. . . . And tonight you've heard every single person that took this mic and I'm sure in the comment box, is going to expel the same -- the same echoing of please do not renew that lease. And if it is renewed, it's -- it's really not by a binding document because according to the laws that is currently in place we don't need legislation to introduce something for this lease to continue or to stop the use of Makua. That is not needed. . . . It's already written in the laws and the documents that's before us. And so being that those documents is the signed contracts, it needs to end in 2029. So just reemphasizing that and just, please, like I said a few months ago, allow this opportunity for community and I knew two hours was going to be enough and that's actually my written testimony, and we're two hours over the time. . . . But I appreciate you guys for allowing us that extended time, but please don't let this be formality. Please take our words and our -- our brokenness back to the leaders to say there is no more renewal. Because you guys then will be a violation of laws that are currently in place and contracts that are currently signed, so please take that back and know that there is no renewal in 2029. Mahalo.</p>	Please see General Response.

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Ellen Wilhite		Please give careful consideration to the option of returning Makua Valley to the State of Hawaii. There are <u>other military training areas on Oahu and the other islands that could accomplish the training goals of the military.</u> Makua Valley has a special significance to the people of Hawaii. As the daughter of a cultural anthropologist who grew up near Makua Beach, I emphasize that the whole valley, and not just the section makai of the highway, is culturally important and should be returned to the full use of the citizens of Hawaii. Thank you.	The scope of the EIS is limited to State-owned lands on O'ahu training areas. The adjacent U.S. Government-controlled lands would continue to be used for training, and transfer of these lands is outside the scope of the EIS.
Robert Willing		I oppose the renewal of all the Army Military Leases on Oahu. Please clean up your mess and leave. I do not want you here in Hawaii! Mahalo	Please see General Response.
John Witeck		My wife Lucy and I strongly oppose extending the military's leases to Poamoho, Kahuku, Makaha and other sites in the islands. There has been much environmental damage done at these sites. These lands are greatly needed for constructive civilian uses.	Please see General Response.
Andrea Woods		Good evening. My name is Andrea Woods, and I am the probably sole supporter of the renewal of military lease at the Kahuku training grounds. I believe the military needs to be in a state of readiness for all of its operations and the training grounds are an integral tool for troop preparedness. Stewardship of the land is of vital importance, and the state must make its standards a condition of the lease. I feel that compared to the state, the military is better equipped both financially and with manning to act as land stewards. Although from what I've heard tonight, that's -- many people disagree. But thank you.	Please see General Response.
Kami Yamamoto		Hello. My name is Kami Yamamoto. I have lived in Wahiawa my entire life. I'm fourth generation here. My mom's right over there. And I just want to talk about just my personal experiences, why I've come to distrust the US military -- I don't believe anything you guys say and promise -- and why we don't need the US here in Hawaii, in the Philippines, anywhere else in the world. After I joined Filipino grassroots organizations a few years ago, I learned that the 25th Infantry Division, which is housed in Schofield, trains and deploys	Please see General Response.



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		<p>military personnel to train the armed forces of the Philippines. The US Army trains the AFP in jungle operations in places like here in Wahiawa, Kahuku, Waianae. And they even have annual trainings together, like the Balikatan exercises that just concluded just last month. It's armies like the AFP that are trained in counterinsurgency tactics to target, harass, and kill peasant farmers, workers, and other human rights advocates, some of people I know. The brutality of the AFP is well-known. Earlier this year, the International People's Tribunal ruled that Biden, Duterte, and Marcos administration as guilty of gross human rights violations. And I encourage you, the US military, to listen to the trial, to hear the stories of survivors who were kidnapped in broad daylight, or the loved ones of organizers who are tortured, murdered, and paraded as trophies, and remind yourselves that it's you guys who train them to do that, just like -- just like they're doing in Palestine. These trainings are supposedly in the name of protecting democracy, promoting peace, safekeeping the Indo-Pacific. The list goes on and on. But like Hawaii, the Philippines is nothing but a pawn in the US war games. And it's the people who suffer. Whether it's here in Hawaii, the Philippines, or in Palestine, these people may be terrorists to you, but to me, our kasamas in the Philippines, people here in Hawaii, these are the very people that we -- inspire us to continue to organize ourselves and to -- and to dream of a better society for our future. The military does nothing except exploit people and natural resources. We don't need the renewal of the military leases here in Hawaii. We don't need the US military bases in the Philippines, and we don't need them anywhere else in the world. We say, US out of Hawaii; US out of the Philippines and everywhere else.</p>	
Aiko Yamashiro		<p>Aloha. I believe the lands currently leased by the army should not be renewed for military training, and instead restored to the larger good. The safety of our community depends on healthy lands and waters, human connection to land and each other. These relationships should be of the utmost priority. They are not negotiable. I would like to see more of the resources currently going</p>	Please see General Response.

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		to the military to instead go toward education and healthcare and environmental recovery. This creates a stronger longterm safety net for all, including my one year old child.	
Byrnes Yamashita		I support the proposed actions of the DEIS for Army Training Land Retention at Kahuku, Kawailoa and Makua as described. The suspension of live fire training at Makua reduces the threat of wildfires and permits visitation by Native Hawaiian personnel as prescribed by ongoing agreements and negotiations for cultural and environmental purposes. The military mission of the ground units of the US Army and Marine Corps require large tracts of land for simulated warfare training in as realistic as possible conditions. Simulation and other high tech training can substitute for some but not all physical training.	Comment noted.
Robin Yardley		To Whom this may Concern; Aloha. Please discontinue the Army's accessibility to utilize our home, here in the Hawai'i Nei for their training grounds, thus, disregarding significantly sensitive environments to cause severe & long lasting impacts to our extremely important sites here in our home. Search for areas outside of Hawai'i for your war games as we are done with suffering the effects of your ill intentioned practice of our island home for your target practice. No, infact, cut it out entirely & use that money to feed & house homeless veterans who need it. Mahalo.	Please see General Response.
Sanford Yee		Using our Aina for live fire training is not Pono. How would you like that to take place at your hometown backyard? I don't think you would like that. So please clean up the lease lands and return them to the people of Hawai'i so we can use it for constructive rather than your destructive purposes.	Please see General Response.
Choo Lak Yeow		Aloha and a line to thank you for your well-crafted An Opportunity for Climate Leadership, Wayne Chung Tanaka sensei. Your Hawai'i has a rich history of thinking and acting beyond the short-sighted Western economic assumptions that have now placed our Earth in peril. is so absolutely spot-on. It pleases me to share with you an ancient Hawaiian creation oli that centuries ago had enjoined	Please see General Response.

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		<p>earthlings to care and share our planet earth. How advanced He Mele was is seen in its sophisticated statements on: - Ke kumu honua - the earth begins - pipili ka lani - heaven clings - oki ka honua - the earth is cut - ka honua ua apo kahi - the earth, a circle - he lani mahakea, `a `ole i pahulu - an undeveloped heaven, not exhausted. He Mele , so I'd like to affirm, is our ancestors telling us that their wish to preserve Hawai'i is our command their dream to perpetuate Hawai'i is our desire their ambition to make Hawai'i a better paradise is our goal their message entrusted to us when they are not here and simultaneously is our message our children will power up at a time when we are not there. Please see attached for more information. Arigatou gozaimasu. Appreciatively aye Kahu Choo Lak Yeow Don't go to hungry people without a bowl of rice, a cup of soup, and a heart full of empathy. Provision is a key to lock out hunger and hate. We are all God's people with a responsibility to be our sisters' and brothers' keepers. Aloha Ke Akua - God is Love!</p>	
Yvonne Yoro		<p>To Whom it may concern,          I want to express my profound concerns regarding the timeframe allotted for the community to evaluate the 2,700+ pages of your report. <u>Two months is sadly inadequate for a thorough review of such extensive documentation.</u> This truncated period not only hampers meaningful public input but also reflects a troubling disregard for the perspectives of the people of Hawai'i. It suggests that the process is more a formality than a genuine attempt at inclusive dialogue, further underscoring a concerning lack of respect for community input.</p>	<p>The NEPA and HEPA public review period for a Draft EIS is 45 days; the ATRR-O'ahu EIS had an extended 60-day review and comment period for the public. The Army is unable to accommodate a further extension due to timeline constraints for the future real estate actions following the EIS process.</p>
Yvonne Yoro		<p>The Draft Environmental Impact Statement (DEIS) evaluates only 6,322 acres—the land the U.S. military leases from the state—but it neglects to consider federal lands. <u>This exclusion means the DEIS fails to address the cumulative impacts of military training activities on both state and federal lands, leaving a significant gap in understanding the overall environmental consequences.</u> Moreover, the risk of contamination extends from federal lands to state lands</p>	<p>The ROI for each resource area in the EIS as explained in Section 3.1.4 is defined as either a 100-foot buffer around State-owned lands or a larger ROI that can extend to cover all of O'ahu. Cumulative impacts are discussed for each resource area throughout Chapter 3 of the EIS and considers training impacts on U.S. Government-controlled lands relevant to the Proposed Action.</p>

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		and surrounding communities, a critical factor that has not been adequately addressed.	In addition, Section 3.6.5 discusses relevant environmental contaminant investigations and monitoring that have been conducted on and around the State-owned lands to detect any migration of contaminants, including those sourced from Federal property.
Yvonne Yoro		Despite extensive research of the detrimental effects of land fragmentation on wildlife, it is evident that the U.S. Army minimizes the negative impacts of noncontiguous areas, regardless of their size, disregarding the adverse effects on wildlife populations. The elevation and unique habitat at Poamoho demand the highest levels of conservation and protection, as it is home to many native species with very few other suitable habitats. The DEIS also significantly underestimates the impacts of noise and other training activities on these native species, presenting insufficient evidence to support its conclusions.	<p>In consultation with USFWS the Army has developed and implements conservation measures to protect endangered species. The Army includes a significance criteria that accounts for the impacts from habitat fragmentation. This significance criteria is used as a basis of analysis of impacts of the proposed action on biological resources.</p> <p>Additional noise studies that address impacts on native and protected species have been included in Sections 3.3.5 and 3.8.5 of the Final EIS.</p>
Yvonne Yoro		Additionally, the DEIS inadequately addresses the Army’s greenhouse gas (GHG) emissions and their environmental impact. A meaningful analysis of these emissions is crucial for understanding their full impact on climate and local ecosystems. The Army must integrate climate impact considerations into its training plans to mitigate disruptions and reduce GHG emissions.	The Proposed Action is a real estate action (i.e., administrative action), and would not alter or increase from the current state of air emissions for the three Army training areas containing State-owned lands on O’ahu. No further analysis beyond the qualitative GHG and climate change analysis presented in Section 3.7 of the EIS is required. The Army has taken and will continue to take both emissions and climate change into account in all aspects of mission readiness and utilize management measures wherever and whenever possible. The Army's Climate Change Strategy Implementation Plan of 2022 offers a blueprint for the U.S. Army's enterprise-wide climate change adaptation and management measures through FY27. Text has been added to Section 3.7 to convey the Army's commitment to

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			reducing emissions and maintaining air quality standards per the goals and specific actions set forth in the 2022 Plan.
Yvonne Yoro		<p>Recommendations 1. Immediate Return of Land: There should be a complete cessation of military retention of land on O’ahu, and the land should be returned to the people of the Kingdom of Hawai’i. 2. Comprehensive Environmental Analysis: Conduct a detailed analysis of the environmental impacts of retaining these areas, specifically evaluating how each native plant and animal species is affected. 3. Enhanced Public Engagement: Extend the review period to allow for a more thorough examination of the DEIS and facilitate meaningful dialogue between the military and the community. This extension would demonstrate a commitment to genuine public involvement and respect for community concerns. I believe that by first addressing these issues and implementing these recommendations, we can ensure a more transparent approach to environmental stewardship and community engagement.</p>	<p>The EIS conducts the detailed analysis of land retention. It addresses a range of alternatives, including the No Action Alternative under which no State-owned lands would be retained, as described in Section 2.3.3.</p> <p>The NEPA and HEPA public review period for a Draft EIS is 45 days; the ATR-O’ahu EIS had an extended 60-day review and comment period for the public. The Army is unable to accommodate a further extension due to timeline constraints for the future real estate actions following the EIS process.</p>
Blythe Yoshikane		<p>NO TO THE RENEWAL OF MILITARY LEASES. The US Military has proven time and time again (through pollution, land mismanagement, and the displacement of Kanaka 'Oiwī) that they are unfit to care for Makua Valley, Poamoho, and Kahuku. Enough is enough!</p>	Please see General Response.
Kristen Young		<p>END MILITARY LEASES ON O’AHU!</p> <p>Aloha, I am a resident of O’ahu, born and raised. Growing up, I did not fully understand what the presence of the United States military in Hawai’i meant. The Hawaiian Kingdom was taken by force and continues to be illegally occupied by the United States to this day. The occupation has led to many of the issues facing Native Hawaiians and the local community.</p> <p>The military has proven that it cannot adequately care for the environment, nor is it interested in doing so. It is appalling that the military was given (and accepted) leases for just \$1 for 65 years – no amount would ever make it right, but it is truly insulting and disrespectful to this place and people. Hawai’i has only been harmed by this arrangement. Lands have been desecrated and</p>	Please see General Response.

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		<p>made unusable. Communities have been displaced. Women especially have been harmed and abused by military personnel deployed here. Our water has been poisoned. It is completely reasonable for us to want the military out of Hawai'i.</p> <p>The military's presence ultimately hurts security and safety for our local community more than it helps. We will not be your sacrifice. I pray that you will consider and take to heart these comments that Native Hawaiians and the local community have been sharing with love for their people and land. While I do not believe that listening to the people of Hawai'i is a priority for the United States military, I believe there are good individuals in the military and I am holding onto the hope that they will do the right thing.</p> <p>Please let these leases expire, and DO NOT RENEW. This is the ONLY RIGHT THING TO DO. Hawai'i has been wronged for too long. The military had its time here and should excuse itself after the harm it's done. These lands should be returned to Kānaka Maoli to steward and use as intended.</p> <p>Mahalo for accepting my comments.</p>	
SHELLY YOUNG		<p>I Shelly Young do not agree and oppose the renewal of Military leases for the (ATLR) at Kahuku Training area (KTA), Kawailoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR). This has been a long struggle and the EIS is inaccurate! Our resources are at a critical point and outweigh the continuance of Military training exercises in Hawaii. Our land belongs to the people not foreign Military installations. The US Military has already done substantial gross damages to our Aquifers, and much more and haven't been good stewards here. The Military has a lot to clean up and make right here in Hawaii before they exit. Thank you more to come.</p>	Please see General Response.
Elizabeth		<p>Aloha we need these lands back into Hawaiians hand. We do not want any more destruction of our land and water of this land. I beg the military to leave these lands. Please email me to let me know how these land will be taken care of from Hawaiians.</p>	Please see General Response.
Grace (Leilani)		<p>Mahalo ke Akua for allowing me to be here to hear all the testimonies today -- tonight. I know it's late. I'm going to try to</p>	Please see General Response.

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		<p>make it short. My name is Leilani. I'm actually a lineal descendant of Ka'awaloa, where you folks have your training ground which is expected to end. I want to say thank you to the gentleman that left that stood up and talked about freedom, which got me to stand up right now because it infuriated me. I'm tired, but it doesn't seem like I'm infuriated. He has no knowledge of the genocide that has happened. You should be well-versed into our story before you come and occupy. As a displaced descendant, two of our ancestral land is in the training boundary grounds of that training ground. But I understand that it's there. But I'm here to oppose, because I know what it's like to be displaced. I'm against the renewal. You don't belong here. There needs to be an investigation on the titles. The land is supposed to serve and should serve the people, not the military. It needs to be returned. It is our right as descendants, as beneficiaries. And it's also our human right to thrive, because it needs to just be done. And we need to have a chance. Give us a chance. I don't have the privilege of visiting my kupuna, like the lady -- the female here can visit her son. I don't have that privilege. Historically, the military has been a bad steward and tenant. If this was a real estate deal, you would have to show good standing. And you do not have good standing, so your renewal of your lease would not happen in a real estate deal. I would know. The continuation of this occupation of our land is a continuation of the genocide. Thank you. Mahalo.</p>	
Hanaloa		<p>How are you? Can I do this? Aloha kakou. 'ano'ai I want to first acknowledge the people of Waianae and your kupuna. And I want to thank you all for being here. All that came before, I came a little bit late, and that's why I'm 140. But I -- I really appreciate the mana. I appreciate your time because that's really what it's all about, right? It's about time, you know, what we do with our time. That's mana, yeah, manawa is time. It's mana, yeah. So this time we're spending here it's -- it's critical. . . . Now, I'm not being part of this dog and pony show. Oh, I didn't say -- because I feel like I was kind of introduced. If you don't know me, I'm Hanaloa, and -- and I'm not from Waianae. I'm from the people of Oahu. Waikoloa</p>	Please see General Response.

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		<p>is the name of the stream right in between Wahiawa and mililani. And so I hear that bombing all the time. The training area right there. Schofield is really close. Yeah. Get the Wheeler field close by constantly. . . . . So we know there's a lot of capacity to do all the things you're saying you need to do in Makua. You already get places. I don't think you should train there either, but I feel like -- I feel like this whole process is a master class in gaslighting. You know what I mean? . . . . . We're talking about environmental, you know, come on. Environmental. I mean, we just need to look at Kaho'olawe, right? Come on. Still not clean. Most of the island, the vast majority of the island not clean. And I think we can use Kaho'olawe as an example of what the military does because it's not just here in Hawaii, it's all around the world. . . . . So I think what's most important about this meeting is the time that we're given to it, that we're here. This is more about us, you know? An affirmation of -- of our duty, our kuleana, and our ku'e, yeah? We are the descendants, the living descendants, yeah, of -- of this land. Yeah. Our ancestors are this land. . . . . Yeah. This is -- the kiai petitions, that was one of the most profound acts of democracy in the history of humanity. The vast majority of Hawaii, including non-Hawaiians, signed those petitions. Yeah. The two petitions Hui kalai aina and the Hui Aloha aina. . . . . So I stand before you today not only as a military veteran, as an Air Force veteran. Yes, I was completely brainwashed at one time. But I stand here as an aloha aina to carry on what my ancestors who signed those petitions. Yeah. And that's why you're here too. It's in your blood. It's in your heart. It's in your mind. Yeah. . . . . So this is not wasted time. This is hō'ike for us. For us to see each other, to know each other that we are aloha ainas, no matter what our differences are. Yeah. No matter what religions we may follow at this time, what our politics are. . . . . We're here today to protect aina and to demand -- to demand that the Army make good on one of its words anyway. I mean this land wasn't even supposed to come to 2029, right? It's time to release our parent Makua. It's time to release, let it go. Let it go. . . . . Live fire training, how long been pau. You</p>	



Commenter	Submitted By	Comment	Response
		<p>guys don't need to be in Makua anymore.· Yeah. That -- that is low hanging fruit.· Low hanging fruit.· Come on, it's time.· It's past time, and that's just the beginning.· You know, we're in 2024 and we're still acting like we're in medieval times being ruled by feudal lords.· . . .· But we are here still alive.· We're still alive.· We speak for our ancestors.· And we speak for the future generations.· Yeah.· Our mo'opuna, and we speak for those who can't speak, who don't have a voice, like the rocks and the trees and the streams and the evi kapuna that has been desecrated.· So it has to stop.· It has to stop.· . . .· So I know, I -- I thank you guys for all your patience.· I didn't mean -- mean to speak this long because, you know, everybody who's here, we're tired and we've been doing this.· But you know what? An important recommendation going forward, Waianae community, should it be one day for this time. Yeah, shouldn't be two minutes for people to speak and then people get flustered, and you know, they feel all stressed.· You've got the alarm going off. That's not pono. . . .· This is -- we're spending part of our life being here.· We should have that time.· Kupuna should have that time.· Keikis, all of us.· So it should be several days, as long as it takes if this is a real process.· But we know it's not.· Like many have said it's a dog and pony show.· So we are here to kakou each other, to love each other, and so please take this message back to the Pentagon where the decision will be made. . . .· Well, okay, that's kind of naïve.· Take it to the Pentagon who will carry the message to the feudal lords, the billionaires, right?· They're the ones really making the decisions here.· Come on, we're seeing that in real time more than ever.· So please deliver that message and a'ole to release renewal, yeah.· a'ole. Mahalo.</p>	
Kahakuakoi		<p>Aloha mai kakou. Please forgive me if I go over a little.· That's not my intention to take away from anybody else, but I come to -- as a culture practitioner in American language, they say necromancy.· Kahuna ana'ana. . . .· I just wanted to share that I come with the support and kakou of the families of Makua Valley.· Their names are Kaheana, Land Commission Award 5667, Apana 1.· Kaheana, 5667, Apana 2.· Kalauli, 5556, Apana 1.· Kalauli, 5556, Apana 2.· Kalua,</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>6134, Apana 1. Kalua, Apana 2. Kamaka, Kanae -- Kanae 2 and Moo, 1 and 2, Land Commission Award 6092. . . . . I have brought my kupuna here to bring the truth to this circle, to this building, to this issue. My aumakua, Kamohoali'i. My kupuna, Kamohoali'i. The akua, Kane, Lono, Ku, Kanaloa and Tutu Pele. My kaulas, Ki'iali'uaakualele, 'ahiau, and po'okela. . . . . I am Kahakuakoi. I am a lineal descendant of the last chief of Waianae. His name is Heulu. As many may be here as the same family as well. I come from the House of Mahi, the House of Keawe, House of Moana. Ulu, Hema, 'I is my ohana. . . . . I am of the CEO of Kekuanao'a Foundation, a member of the House of Heirs, whose goal works to educate and protect the interests of Kanaka Maoli, Ali'i, Konohiki and Crown Lands. . . . . I would like to remind the occupier as we are all aware, we're in occupation. I'm pretty sure 99 percent of us are aware we're in occupation. Thus, that means FM 27-10, Laws of War, dictate our occupation, which means, as Uncle -- Uncle Sparky had stated, the laws in Hawaii is the Kingdom of Hawaii. This is a violation of international war crimes. . . . . Your U.S., Inc. and your USA de jure and both de facto are in occupation and through the Queen's letter as an armistice stated conditions to the de jure that it is your job to protect the interests of Kanaka Maoli. Your executive order, which forcibly removed Kanaka Maoli from their ancestral lands, is the violation of the Treaty of 1859, the Treaty of Friendship, Commerce and Navigation between the Hawaiian Kingdom and the de jure USA. . . . . This means, for those who don't understand, all Kanaka Maoli rights are acts of genocide upon our soil by the occupier because every law upon our soil should be the Kingdom. And I say this because I teach this to Kanaka Maolis. These rights are being violated. . . . . Who holds you accountable for the 131 years of occupation? This is being heard and petitioned to the heavenly courts of eo. My testimony is held and heard in the heavenly courts, which means all of those who I have stated has heard this petition, and I release this petition for justice to be handed to the desecrators of the sacred kupuna, Papahanaumoku, the waters of Kane, the waters of Kanaloa, Lono, our Tutu Pele,</p>	

Commenter	Submitted By	Comment	Response
		<p>Laka for her forests, I loko o ka Iesu Kristo, amama ua noa. With her permission, right, Inez? [Inez Larson: Yes] There's a notice of declaration going around. Right now I have 10 in my hand that do not support the renewing of Makua Valley. If you haven't gotten one, see me or see Nani. These are signed with witnesses. It's a notice to the military, Mr. Steve.</p>	
Paris		<p>Aloha. My name is Paris and this Trance. We're proud to be from Waianae High School students. I'm here, me and some students have -- me and the students here have had the opportunity and the privilege to go on a cultural access tour to Makua Valley, which was a huge privilege because not a lot of people in our community get to experience what I was able to experience because the gates aren't open to its people. . . . That experience has truly grounded us more into our community. We were born and raised here, and we believe that we shouldn't -- we should and need to have a voice in the decisions that affect our moku. Like, Makua is not a place for bombing; it's a place of healing come on now.</p>	Please see General Response.
Resident of Hawai'i		<p>Aloha, To whoever is taking these into account for the military leases, This EIS report is a major loophole to continue a lease that is not supported by the local people of Hawaii. Obviously I am against the continuation of the lease renewal by the military which are part of the war crimes committed against the sovereign nation of Hawai'i by imposing United states law. The start of the military leases should have not even taken place anywhere here in Hawai'i. The least the military could do is give back lands to the kanaka oiwi (Aboriginal Hawaiians) who are known to steward the land with integrity or at least provide housing for homeless locals that were born and raised in the islands while also cleaning up any remaining mess created from military using the land for their operations. Regardless, a \$1 for the leased properties is a ridiculous amount for that amount of acreage given to the military, while Kama'aina struggle to pay for their properties trying to make a living in a place they grew up in and to some that is all they know. Demilitarize Hawai'i! The military only makes things worse with a neglectful</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		mindset. The military industrial complex has no place in Hawai'i nei. Malama o ka aina, Resident of Hawai'i	
Sharm		Everyone but especially the military should know consequences-- the military is dependent on the law of consequences. If there is zero consequences for the ABUSE of what they already lease we do not serve our military well. Therefore now, I choose the NO ACTION ALTERNATIVE the only action without any negative impact.	Please see General Response.
Trance		Last week during our culture access to Makua something resonated in us. How grateful we are for our kupuna for fighting for our lands. Now, it's our turn to pick up the baton and continue the work that we were meant to do. . . . . During the culture access one of my kumu said something that motivated and inspired me. This isn't the exact words, but it's still relevant, right? How hard would you fight for your land if it was taken from you overnight? Also, mahalo nui for all the kumus, aunties, uncles, and all the culture practitioners for all the work that they had to do for us to have access to these sacred places. . . . . Please, malama Makua, and return Hawaiian lands to Hawaiian hands. This is why we oppose the extension of military leases. Aloha.	Please see General Response.
	Ka Lahui Hawaii	I don't support the Army Leases Renewals and I support the return of the lands at Makua, Poamōho and Kahuku to kanaka maoli.	Please see General Response.
	PrutehiLitekyan Outreach & Public Awareness	Re: Prutehi Litekyan Save Ritidian Comment on Army Environmental Impact Statement for Leases of Hawai'i Kingdom Lands: Makua, Poamoho, and Kahuku Hafa Adai and Aloha On behalf of Prutehi Litekyan: Save Ritidian, we submit the following comments on the Army Environmental Impact Statement for leases of Hawai'i Kingdom Lands: Makua, Poamoho, and Kahuku and we vehemently oppose the proposed retention, continued military occupation, and destruction to these stolen lands and sacred areas. Prutehi Litekyan: Save Ritudian (PLSR) Established in 2017, PLSR is a community-based organization dedicated to protecting and preserving the natural and cultural resources of Guam. This includes the areas proposed to be used for relocating U.S. Marine Corps forces currently located in Okinawa, Japan to Guam, and for military live-fire training. PLSR's members and network comprise of the	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>indigenous CHamoru, the residents of Guam, allies, and concerned citizens with the interest of protecting the beliefs, the culture, the language, the air, the water, and the land of the CHamoru. More specifically, PLSR's members comprise of traditional healers, fishermen, businesspeople, college students, farmers, teachers, social workers, cultural practitioners, and environmentalists. PLSR represents its members, in addition to 25,000 petition signatories, by actively engaging in the legislative, administrative processes and has consistently demonstrated a special interest in the areas of controversy. Since its inception, PLSR has organized more than 1,000 different actions, including letter-writing campaigns, public testimony, school visits, community rallies, comment drives, protests, site of impact tours, press conferences, and more. Accordingly, PLSR and its members have a direct interest in ensuring that federal actions and decisions do not harm or have a potential to harm cultural resources and historical properties not only in Guam, but within other Pacific and Indigenous communities and homelands as well. These interests extend to environmental resources that could constitute as an invaluable cultural resource or "historic property", including sources of water and water bodies, as well as plants, forests, and animals, and the lives of other Indigenous Peoples and Pacific Islanders, all of which are intrinsically connected to Indigenous sovereignty and survivorship. To this end, PLSR expresses serious concerns about the inadequacy of the Environmental Impact Statement for the Army Environmental Impact Statement for leases of Hawai'i Kingdom Lands: Makua, Poamoho, and Kahuku, the lack of FREE, PRIOR, and INFORMED CONSENT of affected Indigenous communities, the ongoing violations of Indigenous rights. The native Kanaka Maoli people have consistently, for years, withheld their consent and resisted against the occupation, contamination, and desecration of these ancestral lands. The US Army only paid \$1 for 65-year leases which are sacred areas rich in the material remains and heritage of the Kanaka Maoli people, as well as native and endangered birds, plants, and animals. This is land theft, cultural theft, and spiritual</p>	

Commenter	Submitted By	Comment	Response
		<p>violations against the Native Hawaiian peoples and all lands should be turned to the forcefully displaced rightful owners. In Hawai’i, the U.S. Military has a horrible track record of accidents and under-reporting of harms, including to several incidents inducing but not limited to Red Hill, Pearl Harbor, and Kaho’olawe. The US military has proved that they are not good stewards nor are they good community partners in the protection of these finite and precious areas. The EIS does not acknowledge the depth of the generational trauma and harm that have resulted from the US military-aided illegal overthrow of the Hawaiian Kingdom, harms that would be exacerbated by the continued occupation and abuse of these stolen Hawaiian lands by the U.S. Department of Defense and its "allies" including the phenomenon of missing and murdered Indigenous women, houselessness, illnesses, and more. Ending the leases would result in greater food security, cultural integrity, and healing and reconciliation for the unjust, uncompensated, and nonconsensual taking of ‘āina from the Kanaka Maoli people. The EIS reflects “significant adverse impacts” on land use (land tenure) and environmental justice with the retention of any lands at Kahuku, Poamoho, and Mākua and fails to acknowledge the greatest and most imminent threat to the security of the U.S. and the planet - the climate crisis - which will only be exacerbated by the status quo priorities the Army is pursuing under its training programs. We repeat our passionate opposition to this proposal and our solidarity with the Kanaka Maoli people. LAND BACK! Thank you and Si Yu’os Ma’āse’. Sincerely, on behalf Prutehi Litekyan: Save Ritidian , Monaeka Flores, Core Member Jessica Nangauta, Board Chair</p>	
Anonymous 1		<p>US MILITARY OUT OF HAWAI’I                      HAWAIIAN LANDS BACK IN HAWAIIAN HANDS!!</p>	Please see General Response.
Anonymous 2		<p>‘A’OLE ‘A’OLE ‘A’OLE ‘A’OLE NO LEASE ON STOLEN LAND ‘A’OLE                      ‘A’OLE ‘A’OLE OLA KA WAI HO’I HO’I KA ‘ĀINA</p>	Please see General Response.
Anonymous 3		<p>To whom it may concern,                      On our day of "EA" I want you to Deoccupy my ‘Āina! NO LEASE</p>	Please see General Response.

Commenter	Submitted By	Comment	Response
		Renual Do what's Right! Return our Land. He Hawaiian mau a mau 'ĒŌ!	
Anonymous 4		Please make this message a lot shorter or a way to skip it. Mahalo.	Please see General Response.
Anonymous "mokihana"		#4 GO HOME BACK TO THE CONTINET!	Please see General Response.
Anonymous Keiki 1		NO LEASE ON STOLEN LAND. JUSTICE FOR ALL = PEACE FOR ALL. FREE HAWAI'I. U.S. OUT. I DO NOT CONSENT TO THE U.S. MILITARY OCCUPATION IN HAWAI'I NEI. AND WE WILL NEVER FORGET THE HARM	Please see General Response.
Anonymous Keiki 2		US MILITARY OUT OF HAWAII	Please see General Response.
Anonymous Keiki 3		KU KIA'I O'AHU. NO LEASE ON STOLEN LAND. LAND BACK. DEMILITARIZED OCEANIA. KEEP HAWAIIAN LANDS IN HAWAIIAN HANDS KEEP HAWAIIAN LANDS IN HAWAIIAN HANDS	Please see General Response.
Anonymous Keiki 4		US MILITARY OUT OF HAWAII	Please see General Response.
Anonymous Keiki 5		NO LEASE ON STOLEN LAND. U.S. Military is a plague on the planet. Do humanity a favor and stop everything you doing and start cleaning up. It will take generations for us to fix all that you have destroyed. Stop NOW. DEFEND LIFE	Please see General Response.
Anonymous Keiki 6		NO LEASE ON STOLEN LAND NO	Please see General Response.
Anonymous Keiki 7		US MILITARY OUT OF HAWAI'I. I hate you.	Please see General Response.
Anonymous Keiki 8		US MILITARY OUT OF HAWAI'I	Please see General Response.
Lāhui	Ka Lāhui	Aloha here are the signatories of the " End Army Leases of Hawaiian Lands on O'ahu " petition. One doc shows the signatories from the Change.org petition and the other doc has the hand signed signatures of the petition. Please accept this as testimony from hundreds of concerned residents, citizens and global community members. [Petition] End Army Leases of Hawaiian Lands on O'ahu As members of the global community, we are demanding that all military leases set to expire in 2029 on O'ahu not be renewed and that these lands be returned to the rightful owners, the Kānaka	Please see General Response.

Commenter	Submitted By	Comment	Response
		<p>Maoli people. Since 1964 when the 65-year leases were signed between the “State of Hawai’i” and the US Army for \$1.00 each, military activities have led to “significant adverse impacts” (according to the Army’s own language in the Draft EIS) on O’ahu’s natural resources, historical and cultural sites, and social fabric. Cultural access to traditional burials and other significant sites on the public lands leased by the US Army remains restricted. The Army is arguing that they need to continue their control over 1,150 acres in Kahuku, 4,390 acres at Kawaihoa-Poamoho, and 782 acres in Mākua valley to practice war games while they ignore their contribution to the climate crisis and how their actions undermine the quality of life for most people who call Hawai’i home. All three Army training areas are home to dozens of endangered species and are located in close proximity to residential communities - exposing residents to hazardous and unsafe combat like conditions including toxic emissions, noise pollution, and fire risks while perpetuating an ongoing legacy of unexploded ordinance, invasive species, and the contamination of water sources and soil on these once-fertile lands which are sacred to the Kānaka Maoli people.                      [See attached for signatures]</p>	



**NEPA and other Environmental  
Planning Documents and Existing  
Management Measures**

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## Appendix F

# NEPA and Other Environmental Planning Documents and Existing Management Measures

The Army has developed a number of NEPA documents; environmental, natural, and cultural resources management plans; and Standard Operating Procedures (SOPs) for its ongoing activities on O‘ahu training areas containing State-owned lands. This appendix lists: 1) NEPA documents (Environmental Assessments [EAs] and Environmental Impact Statements [EISs]) that addressed infrastructure improvements and training activities; 2) Biological Opinions and Memorandums of Understanding (MOUs) and associated mitigation measures; 3) environmental planning, compliance, and conservation documents and associated best management practices (BMPs), management measures, other memoranda/agreements, and implementation guidance documents; and 4) SOPs the Army follows to minimize the environmental and socioeconomic impacts of its ongoing activities within the State-owned lands.

The O‘ahu training areas (i.e., KTA, Poamoho, and MMR with State-owned lands) 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 preparation of this EIS. The Army also adheres to federal, State, and Army regulations, which are described in this EIS.

**Table F-1** lists the available NEPA documents the Army and other agencies have completed for training and development and use of infrastructure including within the State-owned lands. In accordance with Hawai‘i Administrative Rules Section 11-200.1-24(d)(7), **Table F-1** does not include NEPA analysis conducted via categorical exclusion; however, it does include appropriate NEPA analysis documented via Records of Environmental Consideration (RECs), which are required for certain categorical exclusions or actions covered by existing or previous NEPA documentation (32 Code of Federal Regulations [CFR] 651.19). Additionally, in some cases, certain training and development and use of infrastructure predates the lease, predates CEQ NEPA regulations, or the NEPA documents have been lost over time; therefore, not all NEPA documents are available.

<b>Table F-1: Training and Infrastructure within State-owned Lands</b>	
<b>Training/Infrastructure on State-Owned Lands</b>	<b>Applicable NEPA Document</b>
<b>KTA</b>	
Maneuver/ Reconnaissance	2004 Hawai’i Stryker Transformation EIS; 2005 EA for Improvements to Drum Road; 1998 EA for Land Acquisition at KTA; 2010 Programmatic EA for Final Implementation Plan for O’ahu Training Areas
Assembly Area Operations	Pre-lease/pre-NEPA; NEPA documents cited above
Force-on-Force Operations	Pre-lease/pre-NEPA; NEPA documents cited above
Aviation Training Activities	Pre-lease/pre-NEPA; 2012 EIS for Basing of MV-22 and H-1 Aircraft in Support of III MEF Elements in Hawai’i; 2004 Hawai’i Stryker Transformation EIS
Unmanned Aerial Systems (UAS)	2019 O’ahu UAS Training REC
X-Strip [confined Landing Zone (LZ)]	Pre-lease/pre-NEPA; 2012 EIS for Basing of MV-22 and H-1 Aircraft in Support of III MEF Elements in Hawai’i
<b>Poamoho</b>	
Maneuver/Reconnaissance (past activity)	Pre-lease/pre-NEPA; 2008 EA for M1117 Armored Security Vehicles – Army Installations Hawaii
Aviation Training	Pre-lease/pre-NEPA
<b>MMR</b>	
Maneuver	2006 Programmatic EA for the Mākua Implementation Plan, O’ahu, Hawai’i; 2008 EA for M1117 Armored Security Vehicles – Army Installations Hawaii; 2010 Supplemental EA for Various Construction and Management Activities as part of the Mākua Implementation Plan, O’ahu, Hawai’i; 2009 MMR Training Activities EIS; 2002 Prescribed Burn EA
Assembly Area Operations	Pre-lease/pre-NEPA; NEPA documents cited above
Aviation	Pre-lease/pre-NEPA; NEPA documents cited above
UAS	2019 O’ahu UAS Training REC

## **F.1 NEPA Documents and Appropriate Management Measures**

General Army and other NEPA documents that address large-scale planning or training activities on O’ahu training areas containing State-owned lands are identified below. Management measures from these documents relevant to training land retention and O’ahu State-owned lands are also provided below.

- 2019 O’ahu Unmanned Aerial Systems (UAS) Training REC (USAG-HI, 2019a)
  - Facilities/Training Covered: UAS Training Activities
  - Management Measures: None proposed

- 2017 EA for Implementation of the U.S. Army Garrison, Hawai'i and U.S. Army Garrison, Pōhakuloa Integrated Cultural Resources Management Plans [covers all Army training areas on O'ahu, including MMR] (USAG-HI, 2017b)
  - Facilities/Training Covered: None. This document only adopts the Integrated Cultural Resources Management Plan.
  - Management Measures: None proposed.
- 2013 Army 2020 Force Structure Realignment Programmatic EA (Army, 2013)
  - Management Measures: None proposed.
- 2012 EIS for Basing of MV-22 and H-1 Aircraft in Support of III MEF Elements in Hawai'i (Navy, 2012)
  - Facilities Covered: Landing Zones
  - Management Measures (from Record of Decision [ROD]):
    - Conduct cultural surveys of landing zones and then avoid or mitigate landing zones with cultural resources. (KTA)
- 2009 MMR Training Activities EIS (USAEC & USACE, 2009)
  - Facilities/Training Covered: Maneuver, CCAAC, Staging (Assembly)
  - Management Measures (from Tables 8 and 9 of the ROD):
    - Evaluate and implement land management practices to reduce erosion impacts.
    - Develop a monitoring program to monitor potential off-site contamination
    - Limit convoys containing oversize or overweight vehicles to two vehicles
    - Instruct soldier to clean boots and equipment directly prior to marches to eliminate spread of nonnative species
    - Re-vegetation of critical habitat affected by fires
    - Replace the 5,577 feet of fencing that burned in the 2003 Mākua fire.
    - Implement the INRMP, MIP, and IWFMP
    - Limit low-altitude aviation flying over areas likely to harbor marine mammals and when visibility is limited, avoiding flying over seals present on Mākua Beach, using night vision goggles and thermal scanning during nighttime flights, maintain a 1,000-foot separation from observed humpback whales; develop and implement a comprehensive reporting and monitoring program, and continue informal consultation with NOAA Fisheries.
    - Conduct Army monitoring of cultural resource, clearing vegetation from resources, and documenting and repairing any damage
    - Conduct avoidance training, implement site protection measures, relocate any targets or training activities that could disturb or damage known cultural resources, conducting inspections following training to ensure that resources were not harmed, survey and evaluate the additional area used for training
    - Avoid all recorded cultural resources during training, and align firing points and paths to avoid shooting over cultural resources.

- Implement post-wildfire erosion control measures that may include native plant reseeding and selective planting of burned areas or engineering controls to redirect or control runoff.
- Prepare and implement an erosion control plan. This plan will include provisions for periodic monitoring, methods for identifying erosion problems, and management practices for addressing erosion problems.
- 2008 EA for M1117 Armored Security Vehicles – Army Installations Hawaii (USAG-HI, 2008b)
  - Facilities Covered: Roads, trails, ranges, tactical vehicle maneuver and training areas
  - Management Measures (from Finding of No Significant Impact [FONSI]):
    - Develop master plans that would reduce vehicle travel.
    - Implement Executive Order 13423 goals to reduce greenhouse gas emissions.
- 2006 Final Programmatic EA for the Implementation of the Integrated Wildland Fire Management Plan [covers all Army training areas on O'ahu, including MMR] (USARHAW, 2006)
  - Facilities Covered: Firebreaks/access roads, dip tanks
  - Management Measures (from Section 4 of the Programmatic Environmental Assessment):
    - 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. (MMR)
- 2004 Hawaii Stryker Transformation EIS (Army, 2004)
  - Facilities Covered: Landing Zones, Training areas and trails including Drum Road
  - Training Covered: Maneuver, Reconnaissance, Aviation Training
  - Management Measures (from Table ES-22 of the EIS and ROD):
    - 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.
    - Operate a public website that lists a schedule of upcoming U.S. Army Hawaii (USARHAW) activities, including training and public involvement projects.
    - 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.
    - Involve The Nature Conservancy and DLNR in reviewing and commenting upon future drafts of the O'ahu (and PTA) IWFMP and address comments in the IWFMP, to the extent possible.
- 2008 SBCT ROD
  - Wash vehicles in wash rack facilities prior to returning from the training areas, to minimize the spread of weeds (e.g., fountain grass).

- Train and require Soldiers to clean their gear and vehicles when first arriving in Hawaii and prior to moving from installation to installation, as well as when moving from island to island.

The type, volume, and conduct of training, maintenance and repair activities, and resource management actions that occur on KTA and Poamoho including on State-owned lands were also addressed in:

- 2010 Programmatic EA for the Final Implementation Plan for O'ahu Training Areas (USAG-HI, 2010d)
- A number of Army and other agency REC evaluations for projects and training activities, including establishment of landing zones, UAS training, specific scheduled training exercises, and water purification training, that were considered to be categorically excluded from EA or EIS analysis in accordance with the NEPA [covers all Army training areas on O'ahu, including MMR]

Training activities on MMR including on State-owned land were also addressed in:

- 2006 Programmatic EA for the Mākua Implementation Plan, O'ahu, Hawai'i (USAG-HI, 2006a), and the 2010 Supplemental EA for Various Construction and Management Activities as part of the Mākua Implementation Plan, O'ahu, Hawai'i (USAG-HI, 2010a)
- 2002 EA for a Prescribed Burn at MMR, Island of O'ahu (Army, 2002)

Other NEPA Documents that address types of training activities or infrastructure at KTA, Poamoho, and MMR:

- 2005 EA for Improvements to Drum Road, Helemano Military Reservation to KTA (HQDA, 2005)
- 2004 EA for Testing of the M56 Smoke Generator System Millimeter Wave Module (USAG-HI, 2004)
- 1998 EA for Land Acquisition at KTA (USARHAW, 1998)
- 1982 EA for Amendment of Various Real Estate Agreements for Kahuku Wind Energy Project (Army, 1982)

## F.2 Environmental Management Plans/SOPs and Associated Management Measures

The following non-NEPA/other guidance documents provide appropriate management or mitigation measures for training/infrastructure management; these include operations that were in-place pre-lease or be associated with other Army guidance or SOPs.

## F.3 Biological Opinions and MOUs and Associated Mitigation Measures

- Amendment of the Biological Opinion of the U.S. Fish and Wildlife Service, Makua Military Reservation (USFWS, 2008)
  - Minimize wildland fire to *Hibiscus brackenridgei* and maintain four *H. brackenridgei* ssp. *mokuleianus* populations (two within the Mākua action area and two outside the action area) to be actively managed

- Reduce and manage invasive species impacts to protected species and critical habitat
- 2007 Reinitiation of the Biological Opinion of the U.S. Fish and Wildlife Service for Military Training at Mākua Military Reservation, Island of O'ahu (USFWS, 2007)
  - Range operations staff will be fully trained and have an understanding of weapons restrictions based on fire danger, fuels project completion, and protected species locations and status
  - The Army will not use Ka'ena Point trail for any training activities
  - If an Army training-related fire ignites outside the firebreak road, all weapons usage will cease and USFWS will be notified within one hour
    - The Army will provide the USFWS with a briefing that includes the fire cause, forecasted and actual fire weather and fire behavior, and predicted and actual helicopter productivity
    - The training range will only be reopened after USFWS has determined the Army actions that contributed to the fire and the resulting fire suppression were conducted within the requirements of the BO
  - If a prescribed burn or a fire started by military training, burns any portion of an MU or designated critical habitat, the Army will meet with USFWS to determine next steps
  - Smoking is only permitted in the administrative bivouac site or near the Mākua Range Control Building. Smoking is not permitted past the gate into the actual valley
  - All ordnance fired will be aimed to fall within the south firebreak road and targets will be placed to minimize the possibility of ammunition going outside the firebreak road
  - No live-fire training will be permitted when fire danger is high
  - No illumination rounds will be permitted at MMR
  - Live-fire training will take place on existing training ranges and will be contained in the surface danger zones
  - Open fires are not permitted anywhere at MMR
  - There will be no off-road vehicular activity at MMR
  - Prior to night training approval, helicopters must be authorized for wildland fire suppression usage
  - The Army will fully-fund the MIP Addendum and the Wildland Fire Management Plan
- 2004 Reinitiation of the 1999 Biological Opinion of the U.S. Fish and Wildlife Service for U.S. Army Military Training at Makua Military Reservation (USFWS, 2004)
  - The Army will coordinate with USFWS to develop a post- fire revegetation plan for any critical habitat that occurs within MMR.
  - A management action completion timeline and a critical habitat assessment will be included in the revegetation plan
  - Post- fire revegetation plan or other post- fire emergency action implementation cannot delay implementation of other MIP actions.



- A specific fire management plan will be established for Kahanahaiki, Lower Ohikilolo, and Kaluakauila management units
- The Army will provide an annual report describing species specific management actions completed that year.
- The Army will coordinate with USFWS after every fire event that occurs outside of or escapes the firebreak road
- Routine Military Training and Transformation of the 2nd Brigade 25th Infantry Division (Light), Biological Opinion of the U.S. Fish and Wildlife Service, Island of O'ahu (USFWS, 2003)
  - General
    - Army to develop and implement Integrated Wildland Fire Management Plan
    - Invasive species management
      - Implement invasive species monitoring programs to minimize the threat of invasive species introductions from range maintenance, construction and training activities by implementing by implementing an invasive monitoring program within and adjacent to landing zones, trails, and roadsides
      - Newly found weeds will be eradicated
      - Prevent secondary weed spread from fire by monitoring and eradicating newly dispersed weeds
      - Provide wash racks to minimize dispersal of invasive species
      - Develop and implement an educational program regarding cleaning vehicles and field gear to all soldiers
      - Persons and equipment coming from foreign countries will go through U. S. Department of Agriculture and U.S. Customs inspections
      - Develop and distribute brown tree snake response and alert posters
      - Continue active participation in the O'ahu Invasive Species Committee
      - Develop a herpetofauna certification program
      - Establish the phytosanitation certification program
      - Coordinate with the Toxicants Working Group to determine a safe toxicant for controlling populations of newly established invasive species
      - Use environmentally safe toxicants for invasive species control or eradication
      - Identify the source and time of the invasive species introduction
      - Pursue implementation and funding for the licensing and application of more effective rodenticides
    - Reduce and avoid damage to endangered species by foot traffic via education, Integrated Training Area Management, fencing, and signage

- KTA
  - Fence all occurrences of *eugenia koolauensis* to restrict foot traffic and remove ungulate pressure
  - Assess and develop solutions to minimize soil disturbance, vegetation loss, and other habitat degradation
  - Include Erosion and Sediment Control Management Plans where appropriate
  - Develop fuel modification plan for *eugenia koolauensis*
- Memorandum of Understanding (MOU) between the U.S. DoD and the USFWS 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
  - Follow all migratory bird permitting requirements for intentional take under 50 CFR 21.22, 21.23, 21.26, 21.27, or 21.41
  - Encourage incorporation of comprehensive migratory bird management objectives into relevant DoD 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 DoD lands to the extent feasible to facilitate decisions about the need for, and effectiveness of, conservation efforts work
  - Work cooperatively with USFWS and state and fish and wildlife agencies to promote timely development, effective review, and revisions of the Integrated Natural Resources Management Plan (INRMP), including any potential revisions to promote the conservation of migratory birds
  - Incorporate conservation measures addressed in regional or state bird conservation plans in the INRMP development process
  - Allow the USFWS 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 non- consumptive 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 USFWS
  - 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

## **F.4 Resource-Specific Environmental Planning, Compliance, and Conservation Documents and Associated BMPs, Management Measures, other Memoranda/Agreements, and Implementation Guidance Documents**

### **F.4.1 [3.7] Air Quality and Greenhouse Gases / [3.9] Geology, Topography, and Soils / [3.10] Water Resources**

- Dust and Soils Management and Monitoring Plan (USAG-HI, 2006b)
  - Restrictions on the timing or type of training during high-risk conditions
  - Assess road\trail conditions and suggest and implement mitigative measures to minimize fugitive dust emissions and soil erosion (i.e., proper road and trail construction, mechanical stabilization and the use of dust palliatives)
  - Vegetation monitoring
  - Use of remote weather stations (KTA)
  - Buffer zones to minimize dust emissions in populated areas
  - Combat trail construction and maintenance
    - Grade combat trails and secondary roads in the training areas for a maximum density and minimum of voids to optimize moisture retention while resisting excessive water intrusion
    - Allow for adequate surface drainage
    - Conduct frequent maintenance on a semi-annual basis and more frequent if required, e.g., regrading, recompacting, or replacement of aggregate
    - Materials should be sufficiently cohesive to resist abrasive action and should have a liquid limit no greater than 35 and a plasticity index of 4 to 9
  - Mechanical stabilization of soils to minimize dust and manage erosion, which involves mixing soils of two or more gradations; the blending takes place at the construction site, a central plant, or a borrow area, and following blending, it is spread and compacted to the required densities by conventional means
  - Use of dust control palliatives, such as application of calcium, magnesium chloride, calcium lignosulfonates, or other environmentally friendly materials
  - Restrictions on helicopters hovering and landing are implemented if soil and atmospheric conditions indicate that excessive dust generation could occur
  - Adaptive management planning for training exercises considers installing a training buffer zone (currently 1,000 feet from residential boundaries) as appropriate based on the location and frequency of exercises, and hours and speed of movement to help minimize dust movement and air quality emissions off-installation

#### **F.4.2 [3.7] Air Quality and Greenhouse Gases**

- Other Air Quality Management Measures cited in other documents
  - Adherence to requirements for control of fugitive dust in HAR Chapter 11-60.1-33
  - Adherence to Unified Facilities Criteria 3-250-09FA, Aggregate Surfaced Roads and Airfields Areas, which provides dust control requirements for aggregate surfaced roads on O‘ahu training areas, including those with State-owned lands

#### **F.4.3 [3.14] Airspace / [3.8] Noise**

- U.S. Army Garrison, Hawai‘i Installation Compatible Use Zone Study (USAG-HI, 2017e)
  - 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)
  - USAG-HI issues a monthly training advisory to the public informing the local community, stakeholders, and elected officials of upcoming training on O‘ahu that may be louder and noticeable than routine activities. The recurring advisories cover aviation, blank munitions, and UAS training, and convoys on local roadways. For stand-alone, large-scale, Joint- or Army-lead exercises on O‘ahu, USAG-HI publishes a separate advisory to increase the public’s general awareness of these training exercises
  - To abate aircraft noise impacts, pilots are trained to avoid unnecessary overflight of populated areas and to avoid all residential areas, including those in sparsely populated areas. All pilots are trained to be sensitive to the concerns of nearby communities and to obey the no-fly zones around KTA
  - U.S. Army Hawai‘i 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

#### **F.4.4 [3.3] Biological Resources / [3.17] Human Health and Safety / [3.9] Geology, Topography, and Soils / [3.10] Water Resources**

- Integrated Natural Resource Management Plan, Island of O'ahu (USAG-HI, 2010b)
  - Ecosystem management
  - Stewardship
  - Conditions and use
  - Military mission integration with sustainable land use
  - Natural resources consultation requirements
  - Partnerships and collaborative planning
  - Public access
  - Army compatible use buffers
  - Hawai'i's Comprehensive wildlife Conservation Strategy integration
  - Threatened and endangered species management
  - Consultation
  - Wetlands and deep-water habitat management
  - Law enforcement of natural resources laws and regulations
  - Fish and wildlife management
  - Migratory bird management
  - Vegetation management
  - Forest management
  - Pest management
  - Land management
  - Agricultural outleasing
  - Outdoor recreation
  - Bird/animal aircraft strike hazard
  - Wildfire management

- Natural resources personnel training
- Coastal/marine management
- Floodplains management
- Community involvement and education
- Watershed management
- Aquatic health and water quality management

#### **F.4.5 [3.3] Biological Resources / [3.17] Human Health and Safety**

- Integrated Wildland Fire Management Plan O'ahu Installations (USAG-HI, 2023b)
  - Fire Prevention: education, enforcement, engineering, ignition control
  - 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 USAG-HI lands, off-installation deployment
  - Post-Fire Actions: records and reports, reviews and formal investigations, post-fire analysis
  - Budget and Implementation

#### **F.4.6 [3.3] Biological Resources**

- Addendum to the Implementation Plan, Makua Military Reservation (USAG-HI, 2005)
  - The Mākua Implementation Plan emphasizes the management of three population units of plant species and 300 individuals of *Achatinella mustelina* in each Evolutionarily Significant Unit in accordance with the 2007 Mākua Biological Opinion and the 2008 amended BO. These BOs require that the Army to provide threat control for *Chasiempis ibidis* (O'ahu elepaio) in the Mākua Action Area, stabilize 28 plant species and *Achatinella mustelina*, and take precautions to control the threat and spread of fire
  - The natural resource management actions included the construction of fences to protect native ecosystems and endangered species, alien species control, outplanting, and genetic material collections
- Implementation Plan for O'ahu Training Areas (OIP); Schofield Barracks Military Reservation, Schofield Barracks, East Range, Kawaihoa Training Area, Kahuku Training Area, and Dillingham Military Reservation (USAG-HI, 2008a) [covers KTA and Poamoho only]
  - The OIP outlines stabilization measures for 23 plant species, 75 pairs of *Chasiempis ibidis* (O'ahu elepaio), and six extant Koolau *Achatinella* species, *Drosophila montgomeryi*, and *Drosophila substenoptera*. Of the 23 plant species, management activities are conducted for 11 species at KTA

#### **F.4.7 [3.9] Geology, Topography, and Soils / [3.10] Water Resources**

- Erosion Control Best Management Practices Program Plan (USAG-HI, 2021f)
  - The Directorate of Public Works (DPW) Environmental Division (ENV) personnel use field survey techniques to identify and correct erosion prone areas
  - DPW Engineering evaluates the areas based on City and County of Honolulu BMPs handbook to determine the preferred method for stabilization
- Storm Water Management Plan (SWMP) (USAG-HI, 2021c) [covers all Army training areas on O'ahu]
  - Army installations that operate a Municipal Separate Storm Sewer System (MS4) must obtain coverage under a small MS4 storm water permit from an authorized permitting authority and implement a storm water management program. All Army MS4s have measures in-place to ensure compliance with applicable permit recordkeeping and reporting requirements
  - Army installations implement storm water training programs to ensure that base personnel, contractors, and visitors are aware of their role in the program and the importance of their participation to its success
  - The USAG-HI Directorate of Public Works Environmental Division (DPW ENV) staff will modify the SWMP when any discharge limitation or water quality standard established in HAR, Section 11-54-4 has been exceeded. They will include BMPs and/or other measures to reduce the amount of pollutants from entering state waters. The SWMP will also be revised when conditions on the installations change, when more effective pollution controls are implemented, and when storm sewer system modifications occur
  - DPW must retain records of all applicable monitoring activities, including, all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and a copy of the NPDES permit for a period of at least three years from the date of the measurement, report or application, or for the term of this permit, whichever is longer
  - Public Education and Outreach BMPs:
    - Develop a comprehensive education and outreach strategy that includes goals, target audience, distribution methods, and available resources.
    - Develop and distribute outreach materials, including pamphlets, displays, and signs
    - Installation of storm drain markings
  - Illicit Discharge BMPs, per the requirement of the permit:
    - Establish a connection permits program for facilities not owned and operated by USAG- HI
    - Conduct field screening of storm drain outfalls
    - Establish a complaint investigation and spill hotline with an associated shared network database to track complaints and investigations
    - Establish enforcement policies for those not in compliance
    - Develop a Spill Prevention and Response Program
    - Develop a Used Oil and Toxic Materials Disposal Program

- Conduct training for Environmental Compliance Officers and all pertinent facility personnel
- Construction Site Runoff Control BMPs:
  - Implement erosion and sediment control measures and BMPs in accordance with policies and manuals
  - Establish procedures for inventory of construction sites
  - Develop a procedure for tracking construction actions
  - Conduct inspections at construction sites
  - Enforce storm water requirements
  - Non-compliance actions
  - Training
  - Education
- Post-Construction BMPs:
  - Standards Revision
  - Review of Plans for Post-Construction BMPs
  - BMP, Operation and Maintenance, and Inspections Database
  - Education and Training
- Pollution Prevention/Good Housekeeping BMPs:
  - Debris control
  - Chemical applications
  - Erosion control
  - Maintenance activities
- Commercial Activities Discharge Management BMPs
  - BMP implementation
  - Enforcement
  - Inventory and mapping of commercial facilities and activities
  - Prioritizing areas for inspections
  - Inspections
  - Training

**F.4.8 [3.6] Hazardous and Toxic Materials and Wastes / [3.9] Geology, Topography, and Soils / [3.10] Water Resources**

- Spill Prevention, Control, and Countermeasures Plan (USAG-HI, 2019b)
  - Designate one person who will be responsible for discharge prevention efforts (typically the unit ECO)



- Schedule, conduct and document refresher training for oil-handling personnel at least once a year including review and evaluation of any known discharges or failures, malfunctioning components, and/or any new precautionary procedures or measures
- Temporary Drum Storage:
  - No permanent hazardous material/petroleum, oil and lubricant (POL) storage on any training ranges.
  - Military Units must obtain written approval by DPW Environmental and Range Control to temporarily use and store hazardous material/POL portable containers in connection with training exercises involving light fluid replacement in tactical vehicles and equipment or for fueling operations.
  - Only Department of Transportation (DOT) approved containers are authorized.
  - If approved, all temporary hazardous material/POL containers used and stored on training ranges must be removed upon completion of the training exercise and return to the Unit's maintenance facility.
  - When authorized by DPW Environmental and Range Control for specific training exercises, temporary hazardous material/POL containers used and stored on training ranges must be stored on covered secondary containment systems and spill kits must be readily available nearby.
  - The Unit must conduct daily visual inspections of the hazardous material/POL containers stored.
  - Range Control conducts routine inspections throughout the duration of the training exercise and a clearance inspection upon the conclusion of the training exercise.
  - A secondary containment system must also be used where services and vehicle maintenance work is to be performed.
- Filling and Handling:
  - Caution shall be exercised at all times while handling petroleum, used oil, cooking oil and hazardous materials or wastes to prevent a harmful discharge to the environment
  - Any loading/unloading connections are to be securely capped or blank-flanged when not in service or when in standby service for an extended time
  - All loading/unloading vehicles are to be inspected prior to filling and departure to prevent discharges while in transit
  - When significant quantities of POL (greater than 55 gallons), in single or multiple transfers will occur, block all down gradient storm or drainage openings within a 50-foot radius, prior to beginning the transfer. Before beginning transfer operations, have adequate supplies of absorbent materials such as socks, pillows, booms, and pads readily available. These are the best products to use because they are reusable. Drains and openings may be blocked by attaching a cover or by dikes of absorbent booms

- For tank filling: Inspect tank truck compartment(s) and hose(s) to ensure that there are is no potential for leaks, ensure that the tank secondary containment valve is in the closed position, place drip pans under connection points and other points with the potential for leakage to occur, use wheel chocks or other system to prevent tank trucks from moving prior to disconnection of transfer lines, and all tank filling operations should be observed by a trained employee. If a discharge does occur, stop the transfer and source of the leak so it does not enter a waterway or drain
- Mobile Refuelers and Transportable Fuel Storage Tanks/Bladders
  - All refueling operations on USAG-HI installations and training ranges using mobile refuelers and fuel storage tanks/bladders must be approved by DPW ENV
  - Tanker trucks and fuel storage tanks/bladders that carry fuel only when operating as tactical fuel points shall be emptied of fuel prior to returning to Garrison
  - Spill response and recovery equipment and supplies shall be located on each vehicle or by each storage tank/bladder and be readily available to refueling personnel
  - When establishing a tactical refueling point on training ranges, tanker trucks and fuel storage tanks/bladders shall be parked/placed inside secondary containment units
  - All hoses must be visually checked for leaks and wet spots.
  - Drip pans must be placed under connection points and valves where there is a potential for leakage to occur.
  - Fuel truck operator must stay with the vehicle at all times during fuel loading/unloading activities but not in the vehicle cab, and must monitor the receiving container to prevent overflow.
  - Drivers and other personnel operating tanker trucks are required to have Fuel Handlers Certification. Standard training consists of the 40-Hour Fuel Handler Certification Course which encompasses safe fuel handling and spill response training
- Gas Cans
  - Fuel cans used and stored on training ranges during field exercises must be stored in a secure area, properly marked and with adequate secondary containment.
- Convoys of Military Vehicles
  - Tactical military vehicle convoys traveling off USAG-HI installations shall be equipped with spill recovery equipment and supplies to respond to small oil, radiator, or hydraulic fluid leaks
  - At a minimum, supplies shall include drip pans, absorbent pads, socks/booms, and granular or other loose absorbent, durable plastic bags, broom, shovel, and container for the used absorbent
  - Leaks and spills are likely to be small and non-reportable but should be recovered on the spot and in a timely fashion

- If a spill occurs, care shall be exercised to prevent/minimize release onto soil or into drainage systems by taking the following steps: 1) Park the leaking vehicle/equipment over concrete or asphalt surface whenever possible and safe to do so. 2) Place drip pan under the leak. Alternatively, place absorbent pads over impervious surface (e.g., plastic bags) to absorb the leak. 3) Immediately block off pathways to soil and drainage systems with socks/booms. 3) Clean up the spill with absorbent material
- All transportation-related spills of Army and USAG-HI units and activities shall be reported to the Installation Transportation Officer (ITO)
- Spill Reporting
  - All spills, no matter how small, must be verbally reported immediately to DPW Environmental and a spill notification form must be submitted within eight (8) hours of a spill discovery.
  - All spills must be immediately cleaned up to the satisfaction of DPW Environmental.
- Implementation Guidance for Army Compatible Use Buffers (DA, 2020)

#### **F.4.9 [3.6] Hazardous and Toxic Materials and Wastes**

- Asbestos Management Plan (USAG-HI, 2001b)
  - Manage asbestos-containing material in-place as long as practicable and prudent
  - Ensure all facilities are adequately surveyed
  - Provide technical assistance, training, and guidance to USAG-HI personnel involved with asbestos-containing material
- Installation Hazardous Waste Management Plan (IHWMP) (USAG-HI Regulation 200-4)
  - Training of in-house staff members, including contractors, to ensure they are knowledgeable of hazardous waste and IHWMP requirements
  - Systematically evaluate waste streams to ensure all potential hazardous or special wastes are properly identified, characterized, and managed
  - Implement pollution prevention initiatives to minimize the generation of hazardous waste
  - Monitor hazardous waste generated on USAG-HI installation
  - Manage the Installation Enterprise Environmental Safety and Occupational Health Management Information System Hazardous Waste Module for the tracking of hazardous waste on USAG-HI installation
  - Staff and manage the Environmental Compliance Training program to train and certify all Environmental Compliance Officer (ECOs) through training curriculum and certification
  - Instill an environmental responsibility attitude and work ethic in soldiers and civilians under their command and ensure personnel receive required environmental training
  - Ensure that all personnel who handle hazardous waste read and become familiar with the site-specific unit/activity/directorate hazardous waste SOP prior to handling hazardous waste

- Manage all hazardous material in accordance with (IAW) all applicable Federal, State, DoD, Army and installation regulations
- Ensure that all fuel storage and fuel transfer operations have been authorized by the DPW ENV
- Conduct inspections to ensure that hazardous material is managed properly
- Contact DPW Environmental Services immediately after identifying a hazardous waste in order to schedule an on-site pre-inspection and pickup of hazardous waste
- Ensure remedial action is initiated for leaks, spills, or improper storage
- All hazardous material has an Enterprise Environmental Safety and Occupational Health Management Information System barcode from the Hazardous Material Control Point (HMCP)
- A Safety Data Sheet (SDS) must be present in a visible and easily accessible location for each hazardous material
- Hazardous materials are properly stored and segregated
- Expired/excess hazardous materials are turned-in promptly to the HMCP or DPW Transfer and Accumulation Point (TAP) as applicable
- Storage areas shall have secondary containment to prevent any unplanned or sudden releases into the environment
- Spill kits must be maintained with appropriate sorbent materials, containers, and other spill response equipment for containing spills IAW USAG-HI-SPCCP 3.5.1. Supplies should be determined based on the type and amount of hazardous material used/stored
- Ensure new products are segregated from in-use containers
- Ensure flammable materials are placed back into flammable storage cabinets when not in use and at the end of each day
- Ensure that damaged or leaking containers are over-packed
- Ensure that materials which are transferred from their original container are transferred to a new container that is capable of safely storing the material
- Ensure that new containers holding transferred materials are properly marked and labeled IAW the OSHA Hazard Communication Standard
- Required personal protective equipment (PPE) items shall be available for all hazardous material handlers IAW SDSs
- Reuse materials to the greatest extent possible instead of disposing of them
- Implement a hazardous waste minimization program. Examples of minimization methods include:
  - For degreasing/cleaning operations, units/activities use the Government solvent recycling service
  - Product substitution: using a less hazardous or sometimes even a non-hazardous product in-place of a hazardous one

- Waste segregation: When a waste is generated, segregation of the wastes is required to increase the reclamation potential of the waste material generated
- All personnel must ensure that all instances of non-compliance with environmental laws and permits are identified and corrected immediately
- Units/activities/directorates that generate or have a potential to generate hazardous waste must develop and implement an SOP specifically for their hazardous waste management activities
- SOPs must be developed prior to any generation of hazardous waste on the installation
- All hazardous waste generated on USAG-HI installations is shipped to the Disposition Services Pearl Harbor (DSPH) or their designated contractor for disposal or picked up by the DSPHs disposal contractor on-site
- Integrated Pest Management Plan, U.S. Army Garrison, Hawai'i: 2015-2020 (USAG-HI, 2014e)
  - Identifies responsibilities; necessary resources; administrative, safety, and environmental requirements; priorities for pest management
  - The Range & Training Land Program (RTLTP) planning process directly supports integration of environmental stewardship into its operation
- Integrated Solid Waste Management Plan (USAG-HI, 2021f)
  - Establish, monitor, and execute programs of municipal solid waste (MSW) minimization, resource recovery, and recycling
  - Establish a data collection system to ensure all solid waste generation and recycling efforts are captured
  - All directorates and tenants are responsible for complying with applicable federal, State, and DoD requirements, and USAG-HI policies.
  - Monitor activities for compliance with the solid waste and recycling requirements
- Lead Hazard Management Plan (USAG-HI, 2001c)
  - Educate personnel about lead hazards and methods of control
  - Provide technical guidance to protect workers from overexposure to lead. Develop public awareness and worker education programs to communicate the risk associated with exposure to lead hazards, ways to prevent or control exposures, and corrective actions to prevent, manage, and abate hazards
  - Direct modifications or changes to the Plan when necessary to improve operations or to comply with new regulatory requirements
  - Update real property records to reflect the results of the lead-based paint (LBP) surveys
  - Coordinate completion of surveys of facilities prior to renovation, demolition, maintenance, and other DPW activities that may disturb lead-containing materials
  - Ensure that dust control methods be applied when painted surfaces are disturbed. The control methods include manual scrapping, wet sanding, or dustless sanding (sander with High Efficiency Particulate Air vacuum attached). Power-tool sanding shall not be used

- Ensure that maintenance personnel are properly trained and equipped to work with activities involving any cutting, drilling and sanding of painted surfaces according to OSHA 29 CFR 1926.62 regulation
- Integrate with other installation programs such as environmental compliance, Whole Neighborhood Revitalization, and EPR Report or DD Form 1391
- Plan and document to ensure regulatory compliance and to provide a historical record for legal liability and future project planning

#### **F.4.10 [3.10] Water Resources**

- Operational Range Assessment Program
  - Long-Term Monitoring Program (ground and surface water quality at MMR)

#### **F.4.11 [3.4] Historic and Cultural Resources / [3.5] Cultural Practices**

- Integrated Cultural Resources Management Plan for the U.S. Army Garrison – O‘ahu (USAG-HI, 2018) [covers all Army training areas on O‘ahu, including MMR]
  - 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
- Programmatic Agreement Among U.S. Army Garrison, Hawai‘i, The Hawai‘i State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Routine Military Training Areas and Ranges on the Island of O‘ahu, Hawai‘i (DA, 2018; USAG-HI, 2018a)
  - Identifies stipulations for Army undertakings for training and related activities
- Memorandum of Agreement Between the US Army Garrison – Hawai‘i, the Hawai‘i State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Vegetation Management in Various Archaeological Sites in Makua Military Reservation, O‘ahu, Hawai‘i. (USAG-HI, 2015b)
- Four 2014 NHPA Section 106 memoranda to the SHPO that cover training on MMR

#### **F.4.12 [3.2] Land Use / [3.6] Hazardous and Toxic Materials and Wastes / [3.9] Geology, Topography, and Soils**

- USARHAW Integrated Training Area Management (ITAM) 5-Year Plan
  - Range and Training Land Assessment (RTLA) Plan for Hawai‘i
    - Ensures through RTLA data and information that biological considerations are part of the Land Rehabilitation and Maintenance project prioritization process; Examples from 2008-2012 program:
      - Conduct annual/semi-annual road and trail assessment reports for all ranges
      - Monitor and assess training area erosion by identifying specific areas requiring mitigation and working with LRAM to identify revegetation methods with highest success rates for ecological attributes (soils, precipitation, etc.)
      - Assess and monitor the condition of open maneuver areas in order to maintain and accommodate highest capacity possible—identifying locations which may be sources of off-site sediment generation and suggest alternative training locations
      - Post-LRAM project monitoring and assess integration of BMPs used as part of rehabilitation efforts to ensure practicality of rehabilitation measures and maintain optimum training capacity
  - Training Requirement Integration
    - Consultation with range officer personnel, trainers, environmental technical staff, natural and cultural resources managers, and other environmental staff members to integrate land management, training management, and natural and cultural resources management data with training requirements and data derived from range and training land assessment (RTLA) and Army conservation program components
      - Environmental/Sustainable Range Awareness
    - Develop and distribute educational materials to users of range and training assets
    - Integrates Sustainable Range Awareness into existing command and/or installation operational awareness activities and events, and initiate new events with materials relating to procedures that reduce the potential for inflicting avoidable impacts on range and training land assets, including local natural and cultural resources
      - Increased education through partnership with Land Range and Maintenance and engineering trainers, on BMPs and their effective implementation
- USARHAW Range Complex Master Plan (USARHAW, 2022)
  - KTA
    - Live-fire and trace ammunition prohibited
    - All munitions, smoking and cooking/warming fires prohibited during Red Fire Index
    - Protocols for notifications when fires start (to allow Officer in Charge [OIC] to initiate “ceasefire” and ONR manager to take appropriate steps when federally listed plants or animals

- are potentially threatened)
- Minimum staffing and fire response (including fire equipment) must be in place for training to occur
- Wash rack use is required to limit spread of invasive species
- Foot maneuver limited to areas that do not contain endangered species (i.e., lower elevation areas)
- Training is restricted to avoid cultural resource sites and habitat and species protection areas
- No-go areas are avoided to prevent the spread of invasive plant species (i.e., devil weed)
- Kawaiiloa Training Area (Poamoho)
  - Training is limited to no ground maneuvers and limited touch and go operations
  - Endangered species fence units exclude training and only natural resources staff is permitted inside
  - Foot maneuver limited to areas that do not contain endangered species (i.e., lower elevation areas)
- MMR
  - Training is restricted to within the firebreak system
  - Training is prohibited during certain periods based on the Red Fire Index Status in efforts to protect sensitive ‘Elepaio critical habitat on most the northern, eastern, and southern (one-third) boundary
  - Two endangered species fence units to the north and northeast are maintained with restricted personnel access
  - Weapons use is restricted based on:
    - Stabilization status of certain endangered species
    - Seasonal variability in grass greenness
    - Hourly fire danger rating
  - [When live-fire resumes] Limited to certain types of weaponry (no tracers) and only occurs under certain weather conditions
  - Helicopter flyover rules to avoid impacting endangered species

## F.5 Standard Operating Procedures

- 402nd Army Field Support Brigade Standard Operating Procedures No. 004-15: Convoy Operations in Hawai‘i (DA, 2016)
- *USARHAW Installation Aviation Standardization Committee (IASC) SOP: Aviation Local Flying Rules*
  - When flying in Warning/Restricted Areas of O‘ahu, Army aircraft must:



- Contact Range Control and obtain permission prior to entry
- Maintain communications with the Wheeler Army Airfield Tower (during operational hours) when within the Class D surface area
- Remain below 200 feet above ground level unless otherwise approved by Range Control.
- Avoid over flight of housing areas and buildings
- The Army implements the following rules and regulations for noise abatement in Hawai'i:
  - Operations at Wheeler Army Airfield from 2200 to 0600 daily are restricted to departures, arrivals, and refueling operations (no closed traffic)
  - Terrain flight training will be conducted only on the Schofield, Mākua, Dillingham or Pōhakuloa Military Reservations, or in the Tactical Flight Training Area
  - Overflight of designated noise sensitive areas below 3000 feet mean sea level (O'ahu) is prohibited unless complying with paragraph e. below
  - Wheeler Army Airfield Base Operations will maintain a master map of all designated noise sensitive areas for the island of O'ahu
  - When operating in areas other than the Tactical Flight Training Area, military reservations or designated noise sensitive areas, pilots will maintain a minimum of 1000 feet above ground level (AGL), with the following exceptions:
    - When adhering to published routes and the altitudes associated with these routes. Published routes may be found in DoD flight information publications, Wheeler Army Airfield Standard Operating Procedures, and the Hawai'i Airports and Flying Safety Manual. (*Aircrews are requested to restrict practice instrument approaches over Mililani and Wahiawa to essential flights only and to increase minimum descent altitudes of practice approaches as much as practical while still maintaining weather requirements*)
    - When complying with these altitudes would violate basic VFR weather minimums. Pilots are urged to use alternate routes if weather will not permit flight at the published route altitude
    - When conducting flights in support of civilian law enforcement or public safety agencies
    - When on a night vision goggle (NVG) formation flight conducted over unpopulated areas. The routes must be reconned during daylight at the altitude to be flown NVG. The routes must have a minimum of 2,000 feet lateral clearance from any populated or posted noise sensitive areas and a minimum of 1,000 feet lateral clearance from any single dwelling. Minimum NVG mission altitude will be 500 feet above ground level. Approval authority for these NVG formation flights will be no lower than Battalion/Squadron Commander
  - Aircraft transitioning along shorelines will remain a minimum of 1/4 nautical mile off- shore or 1,000 feet above the highest obstacle within 2,000 feet laterally, unless complying with paragraph e. above
  - Intentional flight within 1,000 feet, vertically or laterally, of a whale or whale pod is prohibited by federal law. If flying below 1,000 feet above the surface and these animals are observed, alter flight path so as to avoid them by 1,000 feet

- Prior to descending for terrain flight operations, conduct a high reconnaissance and survey the area for livestock/hazards. Increase altitude or avoid sections of routes that could affect livestock in the vicinity
- Intentional flight within 1,000 feet, vertically or laterally, of any surface vessel is prohibited
- Army Pamphlet 385-24, The Army Radiation Safety Program, and 385-10 The Army Safety Program (cited in EMS)
- **KTA:** Standard Operating Procedures for Kahuku Training Areas (USAG-HI, 2020a)
  - No privately-owned vehicles are permitted on the range at any time
  - Tactical vehicles must park in the designated parking area
  - Unless otherwise posted, the maximum speed limit is 15 miles per hour
  - Red signs indicate areas that are off limit areas
  - Aerial pyrotechnics are prohibited
  - All vehicles are washed down at the KTA wash rack prior to departing KTA
  - Emphasis on fire prevention and mitigation of training causing fire ignitions at KLOA Training Area. The area is currently only authorized blank ammunition
  - Special emphasis on reducing or eliminating any adverse environmental impact during any proposed training exercise
  - Air operations require a Notice to Airman (NOTAM) for all aircraft supporting Airmobile and Airborne Operations
  - Appropriate measures are taken to ensure that scheduled Drop Zone and LZs are clear of equipment, vehicles, tents and other obstacles prior to all air operations. Included is posting of guards, barriers or other measures to prevent entry into the area
  - Foxholes and sumps digging is not authorized unless such excavations are approved by Range Operations. The supported units will repair any damage to improvements from excavation or back filling
  - All personnel will be briefed on the safety procedures involving unexploded ordnance, misfires and weapons or munitions malfunctions as contained in paragraph 2-16 of USARHAW Regulation 350-19
  - During scheduled Air/Heavy drops, the OIC must ensure posting of road guards or closing barriers to deny entry in to drop/landing zone
  - After training is complete, the OIC will ensure that the range is cleared of debris, trash, brass; the range is left in a good state of cleanliness; all holes are filled and the area is returned to how it was when first occupied.
  - As specified in USARHAW Regulation 350-19, using unit must be given a clearance inspection prior to departing the range complex. The range inspection checklist is used for clearing. A unit which fails to clear will be denied use of all ranges and facilities until that range, firing point, or training areas have been cleared.

- The range inspection requirements will be used and kept on file at Range Control for thirty (30) days
- The OIC will contact range operation immediately to coordinate day and time for areas inspection
- The OIC ensures all training areas are policed, to include the removal of all trash, obstacle wire, pyrotechnics debris and ammunition brass. Concertina wire will be removed from the training area. Do not dump wire in a different location. If caught, the Battalion Commander will be notified and the OIC and Range Safety Officer will be decertified
- The OIC ensure all excavated areas (fighting positions, tank traps, trench systems, etc.) are back filled and returned to its original state
- The OIC ensures portable latrines are clean and free of trash and coordination for removal if the unit had the contractor deliver the latrines for the exercise
- The OIC returns all issued equipment and signed clearing sheet to Range Control
- While training, units must use caution during training exercises. Soldiers must be aware of and adhere to fire danger-rating restrictions of incendiary ammunition, pyrotechnics, smoking, and other ignition sources. Strict compliance with training restrictions set forth herein will reduce the number of fire starts
- Ensure personnel use proper PPE during applicable activities at the ranges.
- **Poamoho:** Standard Operating Procedures for Kawaihoa Training Area (USAG-HI, 2020b)
  - Emphasis on fire prevention and mitigation of training causing fire ignitions at KLOA Training Area. The area is currently only authorized blank ammunition
  - Special emphasis on reducing or eliminating any adverse environmental impact during any proposed training exercise
    - Air operations require a NOTAM for all aircraft supporting Airmobile and Airborne Operations
  - Appropriate measures are taken to ensure that scheduled Drop Zone and L Zs are clear of equipment, vehicles, tents and other obstacles prior to all air operations. Included is posting of guards, barriers or other measures to prevent entry into the area
  - Foxholes and sumps digging is not authorized unless such excavations are approved by Range Operations. The supported units will repair any damage to improvements from excavation or back filling
  - All personnel will be briefed on the safety procedures involving unexploded ordnance, misfires and weapons or munitions malfunctions as contained in paragraph 2-16 of USARHAW Regulation 350-19
  - Ensure personnel use proper PPE during applicable activities at the ranges.
  - During scheduled Air/Heavy drops, the OIC must ensure posting of road guards or closing barriers to deny entry in to drop/landing zone
  - Flameless ration heaters are unauthorized in dumpsters. Unit is responsible for disposal of heaters

- Records are maintained on the type of ammunition fired, number of rounds fired and number of duds to include their approximate location
- After training is completed the OIC will ensure that:
  - The range is cleared of all debris, trash, brass, and the range is left in a good state of cleanliness
  - The ammunition point is free of any debris
  - All holes are filled and area is returned to how the range was when first occupied
  - The Range Control is notified of training completion and is provided the ammunition expended, number of personnel trained, and the amount and type of vehicles on-site
  - The Range Control has cleared the unit of the range. All items issued has been returned to Range Control
  - Wash rack is scheduled and all vehicles washed down prior to departing East Range Training Area
  - The procedures for Ammunition Accountability are followed by all units using training ammunition on the live-fire ranges and in the training areas
  - Ensures training ammunition is inventoried by a responsible person at the time of storage and every 24 hours thereafter
  - Ensures ammunition detail departs ammunition area immediately upon completion of shift
  - Ensures ammunition is issued in an orderly manner
  - Ensures no weapons are held, stored or disassembled near the ammunition area
  - The OIC will remove all ammunition residue prior to clearing the range
  - The OIC ensures all training areas are policed, to include the removal of all trash, obstacle wire, pyrotechnics debris and ammunition brass. Concertina wire will be removed from the training area. Do not dump wire in a different location. If caught, the Battalion Commander will be notified and the OIC and Range Safety Officer will be decertified
- **MMR:** Standard Operating Procedures for Makua Military Reservation (USAG-HI, 2021e)
  - Aerial pyrotechnics are prohibited
  - Soldiers are briefed prior to training about fire prevention, and cultural and natural resources protection.
  - All personnel will be briefed on the safety procedures involving unexploded ordnance, misfires and weapons or munitions malfunctions as contained in paragraph 2-16 of USARHAW Regulation 350-19
  - Ensure personnel use proper PPE during applicable activities at the ranges.
  - Smoking is only permitted at designated smoking areas
  - After training, the OIC will ensure that the range is cleared of all debris, trash, and the range is left in a good state of cleanliness; and all holes are filled and the area is returned to how it was when first occupied.

- Pyrotechnic are allowed in designated areas with prior approval from Range Control
- There is no digging allowed without prior approval by the Range Officer
- Red signs indicate areas that are off limit areas
- No privately-owned vehicles are permitted on the range at any time
- Tactical vehicles must park in the designated parking area
- Unless otherwise posted, the maximum speed limit is 15 miles per hour
- As specified in USARHAW Regulation 350-19, using unit must be given a clearance inspection prior to departing the range complex. The range inspection checklist is used for clearing. A unit which fails to clear will be denied use of all ranges and facilities until that range, firing point, or training areas have been cleared.
- The range inspection requirements will be used and kept on file at Range Control for thirty
- (30) days
- The OIC will contact range operation immediately to coordinate day and time for areas inspection
- The OIC ensures all training areas are policed, to include the removal of all trash, obstacle wire, pyrotechnics debris and ammunition brass. Concertina wire will be removed from the training area. Do not dump wire in a different location. If caught, the Battalion Commander will be notified and the OIC and Range Safety Officer will be decertified
- The OIC ensure all excavated areas (fighting positions, tank traps, trench systems, etc.) are back filled and returned to its original state
- The OIC ensures portable latrines are clean and free of trash and coordination for removal if the unit had the contractor deliver the latrines for the exercise
- The OIC returns all issued equipment and signed clearing sheet to Range Control
- While training, units must use caution during training exercises. Soldiers must be aware of and adhere to fire danger-rating restrictions of incendiary ammunition, pyrotechnics, smoking, and other ignition sources. Strict compliance with training restrictions set forth herein will reduce the number of fire starts

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# **Land Retention Estate Assumptions**

Lease vs. Fee Simple Comparative Assumptions and Additional Considerations

Current [1964] Leases

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**Lease vs. Fee Simple  
Comparative Assumptions  
and Additional Considerations**

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## Land Retention Estate Assumptions

### Lease vs. Fee Simple Comparative Assumptions and Additional Considerations

For analysis purposes, this EIS assumes:

- The U.S. Government would retain the State-owned land at no less than an equitable, fair market value.
- There would be no difference in ongoing activities in the State-owned land retained under the various alternatives, and applicable land retention estates selected for analysis (i.e., fee simple title, lease, easement).
- A new lease or easement for the State-owned land(s) would include similar conditions as the current lease(s), except for removal of conditions no longer relevant, and would include the State's standard conditions and references to Federal and State regulations in existence at development of a new lease or easement and Army restrictions/requirements based on current lease and settlement agreements by the State or U.S. Government.
- The Army would adhere to applicable State processes/administrative requirements (e.g., administrative rule changes) under a new lease or easement, subject to lease negotiations.
- The Army would conduct similar lease/easement compliance actions at the end of a new lease or easement.
- The State would accept a petition for, and authorize, an administrative rule change that creates a new Conservation District subzone under HAR 13-5 that permit military activities.
- The State would accept a petition for, and authorize, a special use permit in the Agricultural District under HRS 205-6. (Applicable to KTA Parcel A-1 only).

Therefore, ongoing activities, lease/easement conditions, assumed Army restrictions/requirements based on State agreements or judicial directives, and State regulations/administrative requirements would be similar under lease and easement and the potential impacts under lease and easement would be the similar.

If the Army were to retain all or some of the State-owned land(s) via lease, it is assumed the Army would be held to new lease conditions which are similar to the current lease(s) except for the assumptions, as well as the State regulations/administrative requirements, listed above. It is assumed that the new lease conditions would allow military use with Army actions that uphold conservation district values. It is further assumed there would be no substantial change from current Army and State rights, requirements, and limitations.

If the Army were to acquire some or all of the State-owned land(s) via fee simple title, then the Army would not be held to conditions of any new lease or assumed Army requirements based on State requirements from other license agreements. It is however assumed the Army would still conduct many of the same actions as it does under the current leases, and in compliance with existing Army environmental protection policies, plans, and requirements as well as current environmental laws.

It is assumed Army and State rights, requirements, and limitations in the lease and other agreements would not change substantially if the State-owned land were to be retained via lease; therefore, **Table G-1** presents assumed changes in Army and State rights, requirements, and limitations if the State-owned land were to be retained via fee simple title. The current lease conditions are grouped into categories (i.e., State rights, State obligations, limitations on training, Army obligations, and additional considerations) for ease of comparison of the potential differences.

**Table G-1** only addresses State-owned land(s) retained. Army and State rights, requirements, and limitations in the lease would not apply for any State-owned land not retained; therefore, these potential impacts would differ from the State-owned land retained.

The first column in the table describes the current lease terms for the State-owned lands within the training areas; the alpha-acronym + numerals indicate the training area and paragraph number within the lease where the specific lease term can be found. The second column indicates a lease retention method scenario. The third column indicates a fee simple title retention method scenario. A statement shown in the third column is the assumption used in the analysis under the Army fee simple title retention method.

**Tables G-2** and **G-3** below provide additional considerations and associated assumptions for the training areas. There are no additional considerations for Poamoho.

<b>Table G-1: Lease vs. Fee Simple Title Comparative Assumptions</b>		
<b>Oahu 1964 Leases (Kahuku Training Area-KTA, Poamoho-Po, Makua Military Reserve-MMR)</b>	<b>Potential New Lease Scenario</b>	<b>Fee Simple Title Scenario</b>
<b>State Rights</b>		
Right to enter (KTA20, Po20, MMR18)	Same	N/A
State can place signs (KTA18, Po18, MMR-N/A)	Same; MMR-N/A	N/A
State Permission required for construction (KTA10, Po10, MMR9)	Same	N/A
Written consent for certain construction (KTA10, Po10, MMR9)	Same	N/A
Disputes decided by the District Engineer (KTA30, Po30, MMR27)	Same	N/A
Water and mineral rights (KTA14 & 22, Po14 & 22, MMR-N/A & 20)	Same; MMR-N/A (future water rights)	State would lose water and mineral rights
Other special rights (grazing-KTA7, State water lease-Po7, MMR-N/A)	Same; MMR-N/A	Same; Other special rights granted to others (i.e., private or State) would remain as encumbrances

<b>Table G-1: Lease vs. Fee Simple Title Comparative Assumptions</b>		
<b>Oahu 1964 Leases (Kahuku Training Area-KTA, Poamoho-Po, Makua Military Reserve-MMR)</b>	<b>Potential New Lease Scenario</b>	<b>Fee Simple Title Scenario</b>
<b>Limitations on Training</b>		
Fire all combat weapons into the impact area (MMR8 &16, KTA & Po-N/A)	Same; KTA & Po-N/A)	Same; Army would not change impact area
Stockpile supplies and equipment orderly and away from established roads or trails (KTA9, Po9, MMR8)	Same	Same; Army would continue current practices for stockpiling supplies/equipment
Avoid destruction of vegetation/wildlife and forest cover/geological features and natural resources (KTA12, Po12, MMR11)	Same	Same; Army would continue current practices for protection of vegetation... natural resources (exception may be for state listed species take procedures)
Avoid damaging cultural/historic resources (KTA13, Po13, MMR12)	Same	Same; Army would follow federal and State laws for cultural/historic resources
Certain areas must be available for hunting (KTA16, Po16, MMR 14 & 17)	Same	Same; Army would maintain current hunting and recreation areas
<b>Army Obligations</b>		
Remove or deactivate live or blank ammunition (KTA9, Po9, MMR8)	Same	Army would only be required to cleanup retired/closed ranges
Fire Fighting (KTA11, Po11, MMR10)	Same	Same; Army would adhere to current SOPs/Integrated Wildland Fire Management Plan
Maintain roads to prevent erosion & traffic flow (KTA10 & N/A, Po10 & N/A, MMR9 & 16)	Same; traffic flow for KTA and Poamoho-N/A	Same; Army would adhere to current management measures/BMPs & SOPs
Reforest areas where Army has destroyed forest cover (KTA28, Po28, MMR-N/A)	Same; MMR-N/A	Same; Army would adhere to current SOPs, where applicable and with funding availability

Key:

*Same* – means that the condition is assumed to include the same or similar provision/restriction as the current lease

*N/A* – means that the current lease provision/restriction would not apply

<b>Table G-2: KTA: Additional Considerations</b>	
<b>Motocross Activities</b>	
KTA Tract A-1, Motocross License/Use	Motocross activities may continue with the same likelihood under a State lease and Gov fee simple land retention scenario.

<b>Table G-3: MMR: Additional Considerations</b>	
<b>Settlement Agreement—Mālama Mākua vs. Rumsfeld (2001)</b>	
Settlement Agreement—completion of archaeological surveys and marine studies; prohibition of live fire; provision for community observers	Ongoing allowance of community observers party to the settlement agreement including Mālama Mākua and Waianae Coast community members

## **Current [1964] Leases**

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STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE GENERAL LEASE NO. S-3850  
U. S. LEASE, CONTRACT NO. DA-94-626-ENG-77

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, here-  
inafter called the "Lessor", and THE UNITED STATES OF AMERICA,  
hereinafter called the "Government":

WITNESSETH: The parties hereto for the consideration  
hereinafter mentioned covenant and agree as follows:

2. The Lessor hereby leases to the Government  
two (2) 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.

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 19<sup>b</sup> 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 joint activities.

6. The Government may terminate this lease at any time by giving thirty (30) days' notice in writing to the Lessor.

7. The rights herein granted to the Government for use of the above-described Parcel 1 are subject to grazing rights held by J. J. Cambra, Jr., under Revocable Permit No. 868 dated 28 April 1963; consequently, the Government shall exercise caution when firing in Parcel 1. In addition, the Lessor reserves the right to outlease joint use of Parcel 1 hereof for grazing purposes; provided, however, that the Lessor hereby agrees to cancel any such grazing lease within sixty (60) days after receipt of written notice from the Government that grazing activities on the premises are contributing to excessive erosion or are seriously interfering with training activities.

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 hiking 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 Oahu.

11. 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 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.

12. 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, wild life 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.

13. 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.

14. In the event at some future date it is deemed necessary by the Lessor to use ground or surface water on the premises herein demised as a source of public water supply, the area providing said ground or surface water shall be withdrawn from military use upon request of the Lessor and with the Government's concurrence.

15. The Government shall not use any portion of the demised premises as an impact area for explosive or incendiary munitions of any type and shall limit firing on the premises to weapons not larger than .50 caliber provided, however, the Government may also fire inert 3.5-inch rockets or weapons of similar size or purpose as long as such training will not cause fires.

16. When the demised premises or any part thereof is not scheduled for Government training purposes from dusk Friday to midnight Sunday and from dawn to midnight on national holidays, the said premises shall be available to the Lessor which may open them to the general public who shall be subject to the laws of the State of Hawaii during their

presence on the premises which shall be for such limited or unlimited purposes as may be designated by the Lessor; provided, that the Lessor may declare the whole or any portion of the demised premises during such open periods as a public shooting or fishing ground, and the Lessor shall have the right to issue written permits to hunters and fishermen, subject to rules and regulations issued by the said Lessor; and, provided further, however, that permitted hunting and fishing activities shall be coordinated with the training activities of the Government on the demised premises and the Lessor shall obtain from such permittees written releases which will hold the Government and the Lessor harmless from any accidental injuries or deaths suffered by the holders of such permits; and, provided still further, that the Government shall make an effort to schedule its training exercises in such a manner as to enable the general public to use the subject area during the periods hereinabove mentioned and shall publish a notice in two papers of general circulation at least three (3) days prior to each said weekend or holiday on which the premises or any portion thereof will be used for training exercises except when prohibited therefrom by overriding military contingencies. The Government shall not be responsible for the control or safety of the general public, nor shall the Government be responsible for the correction of unsanitary conditions due to general public use of the demised premises.

17. 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 material resulting from use of the said premises by the general public.

18. 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.

19. 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.

20. 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 and any person or persons duly authorized by 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.

21. 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.

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 may 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 representative makes such findings shall be in issue and may be reviewed in any competent court.

(b) In the event this lease is terminated as provided in paragraph (a) hereof, the Government shall be entitled (i) 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 (ii) 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 *Jim P. Terry*  
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

APPROVED AS TO FORM:

*Bert T. Kobayashi*  
Bert T. Kobayashi  
Attorney General  
State of Hawaii

By *Eugene H. Merrill*  
Eugene H. Merrill  
Deputy Assistant Secretary of the Army (I&L)  
(Installations)

*Peter C. Lewis*

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  
(I&I)-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

EXHIBIT "A"

KAHUKU TRAINING AREA

PARCEL 1

A parcel of land situate at Waialeale and Pahipahialua, Koolauloa, Oahu, Hawaii, and being the mauka portion of the Government (Crown) Land of Waialeale and a portion of the land of Pahipahialua (R.P. 5688, L.C.Aw. 8559-B, Apana 37 Part 1 to W. C. Lunalilo), conveyed to the Territory of Hawaii by Trustees of the Estate of James Campbell by deed dated May 19, 1910, recorded in Book 327 on Page 464. (Land Office Deed 1651.)

Beginning at a pipe in concrete marked 22 at the west corner of this parcel of land and at the top of the pali on the west side of Kupahu Gulch, on the boundary between the lands of Waialeale and Kaunala, and at the end of Course 7 of Land Court Application 1095, the coordinates of said point of beginning referred to Government Survey Triangulation Station "Waialeale" being 435.25 feet South and 2,395.43 feet West, and running by azimuths measured clockwise from true South:

1. 246° 51'                    555.6 feet across Kupahu Gulch to the top of the pali on the east side of Kupahu Gulch;  

Thence along the top edge of the pali to the boundary between the lands of Waialeale and Pahipahialua, the traverse between points on the top edge of said pali being:
2. 246° 51'                    500.0 feet to a pipe;
3. 242° 48'                    714.90 feet to a pipe;
4. 227° 23'                    603.20 feet to a pipe;
5. 237° 04'                    174.70 feet to a pipe;
6. 272° 09'                    305.70 feet to a pipe;
7. 297° 09' 30"                253.60 feet to a pipe;
8. 218° 32'                    1,541.22 feet to the boundary between the lands of Waialeale and Pahipahialua;
9. 335° 23'                    400.00 feet along the land of Pahipahialua (Land Court Application 1095);
10. 254° 05'                    248.90 feet along the land of Pahipahialua (Land Court Application 1095):

11. 346° 58' 896.30 feet along the land of Pahipahialua (Land Court Application 1095);
12. 346° 19' 1,757.20 feet along the land of Pahipahialua (Land Court Application 1095) to a pipe in concrete marked 5;
13. 344° 27' 1,312.00 feet along the land of Pahipahialua (Land Court Application 1095);
14. 253° 48' 213.50 feet along portion of the land of Pahipahialua (Land Court Application 1095);
15. 344° 33' 1,329.30 feet along portion of the land of Pahipahialua (Land Court Application 1095);
16. 59° 59' 252.90 feet along portion of the land of Pahipahialua (Land Court Application 1095);
17. 346° 55' 270.60 feet along the land of Pahipahialua (Land Court Application 1095);
18. 337° 16' 808.20 feet along the land of Pahipahialua (Land Court Application 1095);
19. 55° 45' 583.00 feet along Grant 5277 to Trustees of the Estate of James Campbell (Land Court Application 1095);
20. 113° 45' 219.00 feet along Grant 5277 to Trustees of the Estate of James Campbell (Land Court Application 1095);
21. 161° 55' 456.00 feet along Grant 5277 to Trustees of the Estate of James Campbell (Land Court Application 1095);
22. 116° 00' 341.00 feet along Grant 5277 to Trustees of the Estate of James Campbell (Land Court Application 1095);
23. 166° 10' 273.00 feet along Grant 5277 to Trustees of the Estate of James Campbell (Land Court Application 1095);



24. 30° 57' 1,136.50 feet along Grant 5277 to Trustees of the Estate of James Campbell (Land Court Application 1095), to a pipe in concrete marked 17 on the boundary between the lands of Waialeale and Kaunala;
25. 135° 33' 3,759.00 feet along the land of Kaunala (Land Court Application 1095);
26. 134° 14' 1,623.00 feet along the land of Kaunala (Land Court Application 1095);
27. 152° 04' 365.00 feet along the land of Kaunala (Land Court Application 1095);
28. 170° 26' 322.30 feet along the land of Kaunala (Land Court Application 1095);
29. 193° 06' 86.10 feet along the land of Kaunala (Land Court Application 1095) to the point of beginning and containing an AREA OF 449.72 ACRES, more or less; together with a perpetual, assignable easement and a right-of-way to use, maintain and repair the existing access road across adjoining ceded land of the State of Hawaii.

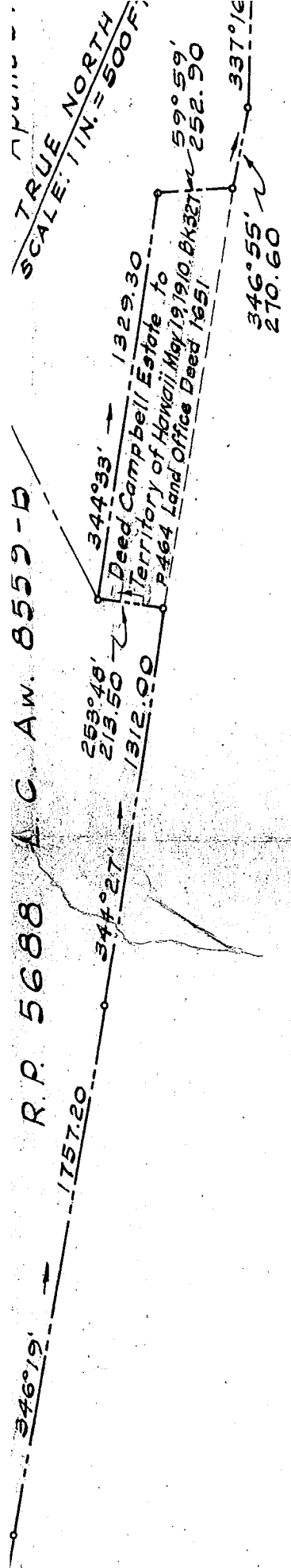
PARCEL 2

A parcel of land situated at Koolauloa, Oahu, Hawaii.

Beginning at an inch pipe on a hill in the ridge bounding the lands of Paumalu and Kaunala and at the East corner of Lot 23 of the Pupukea-Paumalu Homesteads, from which pipe the true azimuth and distance to Government Survey Trig. Station "Waialeale" is 162° 43' 30" 10244.0 feet, as shown on Government Survey Registered Map No. 2252, and running by true azimuths;

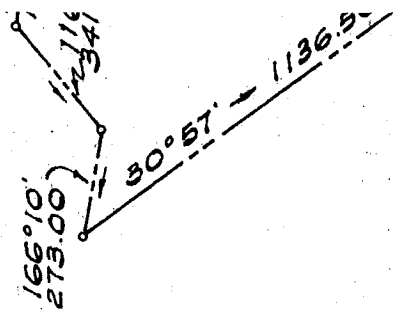
1. Up along the ridge along the land of Kaunala to "Puu Moa" a point in the ridge at the head of the Paumalu Gulch, the direct azimuth and distance being: 328° 00' 6785.0 feet;
2. Thence down the ridge along the land of Waimea to "Puu Ki" a point in the ridge at the head of the land of Pupukea, the direct azimuth and distance being: 86° 10' 6660.0 feet;
3. 162° 00' 500.00 feet along the remainder of Pupukea-Paumalu Forest Reserve to the center of Kaleleiki Stream;

4. Thence along the center of Kaleleiki Stream to the boundary of Lot 21 of Pupukea-Paumalu Homesteads, the direct azimuth and distance being: 159° 30' 4117.00 feet;
5. 275° 30' 507.00 feet along Lot 21 of Pupukea-Paumalu Homesteads to an iron pipe;
6. 219° 37' 300.00 feet along same to an iron pipe;
7. 270° 01' 30" 2,218.00 feet along same down bluff to the center of the Paumalu Stream, and up bluff along Lot 22 to an iron pipe;
8. 225° 46' 2,417.00 feet along Lots 22 and 23 and across the Aimuu Gulch to the point of beginning and containing an AREA OF 700 ACRES, more or less.



TRUE NORTH  
SCALE: 1 IN. = 500 FT.

R.P. 5688 A.C. A.W. 8559-D



1/30"

PARCEL 1  
449.72 ACRES

WAIALEE

KAAPUHIKI

KAUNALANALANA Parcel 1 to KAHUKU TRAIL  
WAIALEE & PAHIPAI  
OAHU, HAWAII  
K.A.A.W. 5235  
U.S. ARMY ENGINEER DIVISION

-500



RECORDATION REQUESTED BY:  
U. S. Army Engineer Division,  
Pacific Ocean

STATE OF HAWAII  
BUREAU OF CONVEYANCES  
RECEIVED FOR RECORD

LIBER 4821 PAGES 394 THRU 408

AFTER RECORDATION, RETURN TO:  
U. S. Army Engineer Division,  
Pacific Ocean  
Phone: 542986

'64 AUG 20 PM 1:37  
/s/ M. Adachi

INDEXED /i/ 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-3846  
U. S. LEASE, CONTRACT NO. DA-94-626-ENG-78

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, here-  
inafter called the "Lessor", and THE UNITED STATES OF AMERICA,  
hereinafter called the "Government":

WITNESSETH: The parties hereto for the consideration  
hereinafter mentioned covenant and agree as follows:

2. The Lessor hereby leases to the Government a  
parcel of land described on Exhibit "A" attached hereto and  
hereby made a part hereof, all to be used for the following  
purpose: Military purposes.

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 19  
hereof.

Inad 100

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 joint activities.

6. The Government may terminate this lease at any time by giving thirty (30) days' notice in writing to the Lessor.

7. This lease is subject to that certain Water License dated March 5, 1951, issued to Castle & Cooke, Inc.

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 hiking 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 Oahu.

11. 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 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.

12. 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, wild life 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.

13. 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.

14. In the event at some future date it is deemed necessary by the Lessor to use ground or surface water on the premises herein demised as a source of public water supply, the area providing said ground or surface water shall be withdrawn from military use upon request of the Lessor and with the Government's concurrence.

15. The Government shall not use any portion of the demised premises as an impact area for explosive or incendiary munitions of any type and shall limit firing on the premises to weapons not larger than .50 caliber provided, however, the Government may also fire inert 3.5-inch rockets or weapons of similar size or purpose as long as such training will not cause fires.

16. When the demised premises or any part thereof is not scheduled for Government training purposes from dusk Friday to midnight Sunday and from dawn to midnight on national holidays, the said premises shall be available to the Lessor which may open them to the general public who shall be subject to the laws of the State of Hawaii during their



presence on the premises which shall be for such limited or unlimited purposes as may be designated by the Lessor; provided, that the Lessor may declare the whole or any portion of the demised premises during such open periods as a public shooting or fishing ground, and the Lessor shall have the right to issue written permits to hunters and fishermen, subject to rules and regulations issued by the said Lessor; and, provided further, however, that permitted hunting and fishing activities shall be coordinated with the training activities of the Government on the demised premises and the Lessor shall obtain from such permittees written releases which will hold the Government and the Lessor harmless from any accidental injuries or deaths suffered by the holders of such permits; and, provided still further, that the Government shall make an effort to schedule its training exercises in such a manner as to enable the general public to use the subject area during the periods hereinabove mentioned and shall publish a notice in two papers of general circulation at least three (3) days prior to each said weekend or holiday on which the premises or any portion thereof will be used for training exercises except when prohibited therefrom by overriding military contingencies. The Government shall not be responsible for the control or safety of the general public, nor shall the Government be responsible for the correction of unsanitary conditions due to general public use of the demised premises.

17. 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 material resulting from use of the said premises by the general public.

18. 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.

19. 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.

20. 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 and any person or persons duly authorized by 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.

21. 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.

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 may 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 representative makes such findings shall be in issue and may be reviewed in any competent court.

(b) In the event this lease is terminated as provided in paragraph (a) hereof, the Government shall be entitled (i) 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 (ii) 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

*Jim P. Lundy*  
~~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  
(I&L)-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.

*Howard V. Kempter*

NOTARY PUBLIC  
Arlington County, Virginia

My Commission Expires November 6, 1966

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  
17th day of August, 19 64, and in the 189th year of the Common-  
wealth.

*H. Bruce Green*

Clerk.

EXHIBIT "A"

KAWAIILOA TRAINING AREA

PARCEL 1

Land situate at Wahiawa, Oahu, Hawaii, and being a portion of the Land of Wahiawa.

Beginning at U. S. Military Reservation Monument No. 54 at the southeast corner of this piece of land, the northeast corner of the crown land of Waianae-Uka, on the west boundary of the Ahupuaa of Kahana and at the junction of the spur ridge (which divides the land of Wahiawa and the Ahupuaa of Waianae) with the Koolau Range, thence running by azimuths measured clockwise from true South:

In a westerly direction along the top of the ridge between the lands of Wahiawa and Waianae-Uka (U. S. Military Reservation of Schofield Barracks, Presidential Executive Order No. 2800 dated February 4, 1918) for the first eleven courses, the direct azimuths and distances being:

1. 91° 02' 23" 6,172.1 feet to U. S. Military Reservation Monument No. 53;
2. 86° 58' 47" 5,793.5 feet to U. S. Military Reservation Monument No. 52;
3. 85° 30' 15" 9,325.2 feet to U. S. Military Reservation Monument No. 51;
4. 94° 41' 42" 1,102.1 feet to U. S. Military Reservation Monument No. 50;
5. 84° 44' 51" 696.7 feet to U. S. Military Reservation No. 49;
6. 103° 01' 53" 964.8 feet to U. S. Military Reservation No. 48;
7. 137° 23' 13" 347.7 feet to U. S. Military Reservation Monument No. 47;
8. 85° 49' 16" 538.7 feet to U. S. Military Reservation Monument No. 46;
9. 74° 44' 22" 266.8 feet to U. S. Military Reservation Monument No. 45;
10. 60° 45' 55" 225.4 feet to U. S. Military Reservation Monument No. 44;
11. 104° 36' 38" 472.0 feet to U. S. Military Reservation Monument No. 43;
12. 205° 33' 4,800.0 feet along the remainder of the Land of Wahiawa;
13. 118° 35' 4,010.0 feet along the same;

14. Thence along the Ahupuaa of Paalaa, along the top of the dividing ridge between the Paalaa and Wahiawa Water Sheds to the summit of Koolau Range, the direct azimuth and distance being: 262° 11' 30" 22,301.6 feet;
15. Thence along the Ahupuaas of Punaluu and Kahana, along the summit of the Koolau Range in a southeasterly direction to the point of beginning and containing an AREA OF 4,390 ACRES, more or less.



64-26963

STATE OF HAWAII  
BUREAU OF CONVEYANCES  
RECEIVED FOR RECORD

RECORDATION REQUESTED BY:

U. S. Army Engineer Division,  
Pacific Ocean

LIBER 4821 PAGES 409 TO 424

AFTER RECORDATION, RETURN TO:

U. S. Army Engineer Division,  
Pacific Ocean  
Phone: 542986

'64 AUG 20 PM 1:37

/s/ M. Adachi

INDEXED /i/ 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-3848  
U. S. LEASE, CONTRACT NO. DA-94-626-ENG-79

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 consideration hereinafter mentioned covenant and agree as follows:

2. The Lessor hereby leases to the Government two (2) 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.

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 13 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 joint activities.

6. The Government may terminate this lease at any time by giving thirty (30) days' notice in writing to the Lessor.

7. 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.

8. 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 Makua Impact Area; provided, however,

the Government shall not use any portion of the demised premises as an impact area for explosive or incendiary munitions of any type and, in recognition of public use of the demised premises, upon completion of a training exercise or prior to entry thereon by the general public, whichever is sooner, the Government shall make every reasonable effort to stockpile supplies and equipment in an orderly fashion and away from established roads or trails and to remove or deactivate all live or blank ammunition from the areas where the general public is permitted under the terms of this lease.

9. 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 Oahu.

10. 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 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.

11. 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.

12. 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.

13. 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.

14. That portion of the demised premises situate between the ocean and the beach road (Farrington Highway extension) or any realignment thereof approved by the Government agency exercising control of the training area shall be fully available for use by the general public, except during periods when the public will interfere with training activities or training will endanger the said public, whereupon the Government shall publish a notice in two papers of general circulation at least three (3) days prior thereto except when prohibited therefrom due to overriding military contingencies, post necessary signs, other markings and/or guards, and shall have the right to restrict public use of the premises and to control traffic access over the said beach road during all periods of danger. In connection with such public use of the premises, the Lessor shall have the right to construct or place thereon public sanitary facilities, picnic tables, etc., provided that such construction is planned, sited and completed as agreed to by the local military commander having control and accountability of said leased premises, and, provided further, that notwithstanding any other provision 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; provided, however, that the Lessor shall be responsible for exercising proper control of the public during periods when public use is permitted and the Government shall have no liability for maintaining grounds used by the public except for removing any litter, refuse or trash resulting from Government activities.

15. 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.

16. The Government shall have the right to fire over and maneuver across Farrington Highway and, in the interest of public safety, the right to interrupt traffic thereon during such training activities; provided, however, that the Government shall minimize interference with traffic by limiting stoppages thereof to 15-minute periods except when prohibited therefrom due to overriding military operations.

17. In connection with public use of the beach area, the Lessor shall also have the right to develop and use for public purposes Kaneana Cave, commonly called Makua Cave, together with an access foot trail thereto and a parking area adjacent to Farrington Highway.

18. 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 and any person or persons duly authorized by 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.

19. 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.

20. 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.

21. 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.

22. 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.

23. 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.

24. The Government shall not sublease or 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.

25. 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.

26. 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 may 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.

27. (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.

28. The Government's compliance with all obligations placed on it by this lease shall be subject to the availability of funds.

29. 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.

30. 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.

31. 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.

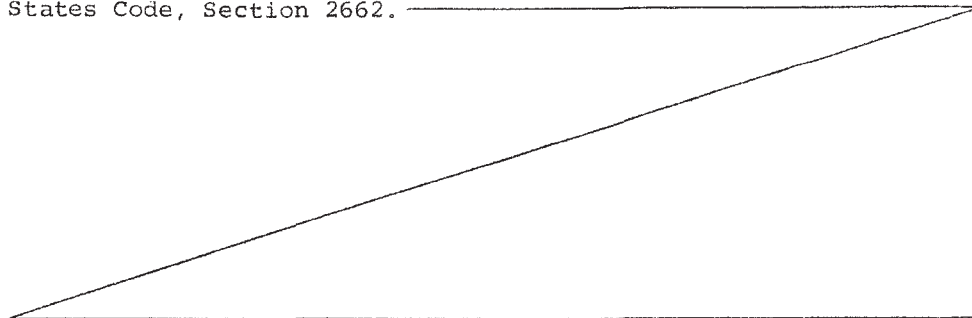
32. (a) The Government may, by written notice to the Lessor, terminate the right of the Lessor to proceed under this lease if it is found, after notice and hearing, by the Secretary of the Army or his duly authorized representative, that gratuities (in the form of entertainment, gifts, or otherwise) 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 representative makes such findings shall be in issue and may be reviewed in any competent court.

(b) In the event this lease is terminated as provided in paragraph (a) hereof, the Government shall be entitled (i) 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 (ii) 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.

33. 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: *[Signature]*  
Chairman and Member  
Board of Land and Natural Resources

And By: *[Signature]*  
Member  
Board of Land and Natural Resources

THE UNITED STATES OF AMERICA

By: *[Signature]*  
Eugene H. Merrill  
Deputy Assistant Secretary of the Army (I&L)  
(Installations)

APPROVED AS TO FORM:

*[Signature]*  
BERT T. KOBAYASHI  
Attorney General  
State of Hawaii

*[Signature]*  
PETER C. LEWIS  
Deputy Attorney General  
State of Hawaii



STATE OF VIRGINIA )  
 ) SS  
COUNTY OF ARLINGTON )

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  
(I&L)-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.

Howard V. Kempter  
NOTARY PUBLIC  
Arlington County, Virginia

Notary Public Expires: 6, 1966

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 189th year of the Common-  
wealth.

H. Bruce Green, Clerk.



- |     |      |         |  |
|-----|------|---------|--|
| 8.  | 301° | 26'     | 598.70 feet along Kuaokala Forest Reserve;   |
| 9.  | 298° | 24'     | 883.70 feet along Kuaokala Forest Reserve;   |
| 10. | 304° | 50'     | 2,055.20 feet along Kuaokala Forest Reserve;   |
| 11. | 336° | 17'     | 935.50 feet along Kuaokala Forest Reserve;   |
| 12. | 230° | 15'     | 820.00 feet along the remainder of Kuaokala Forest Reserve;  |
| 13. | 270° | 35'     | 510.00 feet along the remainder of Kuaokala Forest Reserve;  |
| 14. | 331° | 40'     | 530.00 feet along the remainder of Kuaokala Forest Reserve;  |
| 15. | 33°  | 13' 30" | 224.10 feet along the remainder of Kuaokala Forest Reserve;  |
| 16. | 299° | 44'     | 545.60 feet along Kuaokala Forest Reserve;   |
| 17. | 315° | 56'     | 1,268.80 feet along Kuaokala Forest Reserve;   |
| 18. | 50°  | 00'     | 1,100.00 feet along Makua Military Reservation Impact Area;  |
| 19. | 62°  | 51' 40" | 1,991.74 feet along Makua Military Reservation Impact Area;  |
| 20. | 329° | 28'     | 1,438.00 feet along Makua Military Reservation Impact Area;  |
| 21. | 339° | 36'     | 2,440.00 feet along Makua Military Reservation Impact Area;  |
| 22. | 351° | 08'     | 3,856.00 feet along Makua Military Reservation Impact Area;  |
| 23. | 0°   | 30'     | 2,360.00 feet along Makua Military Reservation Impact Area to the boundary between Makua and Ohiki-lolo Districts; |
|     |      |         | Thence along the land of Ohiki-lolo, along the ridge, the direct azimuth and distance being:                       |
| 24. | 105° | 31' 30" | 1,560.10 feet to the point of beginning and containing a gross area of 1,725 ACRES, more or less.                  |

Excluding from the above area the following, leaving  
a NET AREA OF 1,509.171 ACRES, more or less:

	Federal lands	136.36 acres
	Private lands	21.31 acres
	Farrington Highway Extension	21.00 acres

Canadian Telecommunication Station Site	2.999 Acres
Kaena Point Missile Tracking Station Site	12.00 Acres
Kaena Point Missile Tracking Station Site	<u>22.16 Acres</u>
Total Exclusions	215.829 Acres

SUBJECT TO rights-of-way now used and occupied by Hawaiian Telephone Company, Limited, and The Hawaiian Electric Company, Limited, under rights-of-entry granted by the State of Hawaii.

PARCEL "B"

Land situated at Makua, Waialanae, Oahu, Hawaii

Being all of the land quitclaimed to the Territory of Hawaii by the United States of America dated 26 January 1943, pursuant to Public Law 781-77th Congress dated 2 December 1942, and also being Tract 1 of the Makua Military Reservation.

Beginning at the southeast corner of this piece of land, from which the azimuth (measured clockwise from True South) and distance to Government Survey Triangulation Station "LOLO" is 335° 26' 07" 6519.82 feet.

Thence from said point of beginning by azimuths and distances:

1. 84° 04' 35" 610.00 feet;
2. 144° 59' 00" 460.10 feet;
3. 269° 02' 30" 832.85 feet;
4. 353° 23' 00" 330.00 feet to the point of beginning and containing an AREA OF 5.95 ACRES, more or less.

SUPPLEMENTAL AGREEMENT NO. 1  
TO WITHDRAW FROM  
STATE GENERAL LEASE NO. S-3848  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
STATE OF HAWAII  
U. S. LEASE, CONTRACT NO. DA-94-626-ENG-79

THIS SUPPLEMENTAL AGREEMENT NO. 1, made between the STATE OF HAWAII, represented by its Board of Land and Natural Resources, hereinafter called "Lessor" and the United States of America, represented by the Secretary of the Army, hereinafter called the "Government,"

WITNESSETH:

WHEREAS, by State General Lease No. S-3848 (U. S. Lease, Contract No. DA-94-626-ENG-79), dated August 17, 1964, the Lessor demised unto the Government, for military purposes, two parcels of land designated as "Tract 26, Makua Military Reservation" and described as follows:

PARCEL "A" being a portion of the Government Lands of Makua, Kahanaiki and Keawaula, Waianae, Oahu, Hawaii, containing a gross area of 1,725 acres, more or less, and a net area of 1,509.171 acres, more or less after exclusions, subject to rights-of-way now used and occupied by Hawaiian Telephone Company, Limited, and The Hawaiian Electric Company, Limited, under rights-of-entry granted by the State of Hawaii, and

PARCEL "B" situate at Makua, Waianae, Oahu, Hawaii, containing an area of 5.95 acres, more or less,

for a term ending August 16, 2029; and

WHEREAS, the Lessor desires to withdraw a portion of the demised premises under State General Lease No. S-3848, with no compensation to be paid by the Lessor to the Government, for the addition to the Kaena Point State Park; and

WHEREAS, the Government is agreeable to relinquish said portion of the premises by amendment to the said lease, without compensation, as hereinafter set forth; and

WHEREAS, the Board at its meeting held on April 22, 1988 approved the withdrawal of land from State General Lease No. S-3848, Contract No. DA-94-626-ENG-79, as an addition to the Kaena Point State Park.

NOW, THEREFORE, the parties hereto do mutually agree as follows:

That effective immediately, the Government, for itself, its successors and assigns, does hereby surrender and yield all of its right, title, interest and estate in and to that portion of State General Lease No. S-3848, being a portion of the Government Land of Keawaula and portion of the railroad Right-of-Way in Waianae, situate at Keawaula, Waianae, Oahu, Hawaii, more particularly described in Exhibit "A" and delineated on Exhibit "B," both of which are attached hereto and made parts hereof, said exhibits being, respectively, a survey description and a survey map prepared by the Survey Division, Department of Accounting and General Services, State of Hawaii, said survey description being designated C.S.F. No. 21,036 and said survey map being designated H.S.S. Plat 2174-A; both dated August 28, 1989, and containing a gross area of 758.0 acres, more or less, and a net area of 732.768 acres, more or less, after exclusions, are deleted from the operation and effect of State General Lease No. S-3848, with no compensation, reserving, however, in favor of the Government the right to conduct and operate helicopter flights over the relinquished areas.

AND that the Lessor does hereby accept the withdrawal of said portions of lands described herein.

That except as hereinabove expressly provided, all of the conditions of said State General Lease No. S-3848, shall be and remain the same.

This lease is not subject to Title 10, United States Code, Section 2662.

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 24th day of January, ~~1989~~ <sup>MS sub</sup> 1990.

STATE OF HAWAII

Approved by the Board of Land and Natural Resources at its meeting held on April 22, 1988.

By *Donald M. J. [Signature]*  
Chairman and Member  
Board of Land and Natural Resources

THE UNITED STATES OF AMERICA

By *Michael D. Taylor*  
MICHAEL D. TAYLOR  
Acting Chief, Real Estate  
Division  
U.S. Army Engineer Division,  
Pacific Ocean  
Corps of Engineers

APPROVED AS TO FORM:

*L. J. [Signature]*  
Deputy Attorney General  
Dated: December 18, 1989

C.S.F. 21,036

455 Plat 2174-A

WITHDRAWAL  
PORTION OF GENERAL LEASE S-3848  
TO THE UNITED STATES OF AMERICA

Keawaula, Waianae, Oahu, Hawaii

DIAR  
10-20-89  
136-G





STATE OF HAWAII

SURVEY DIVISION

DEPT. OF ACCOUNTING AND GENERAL SERVICES

HONOLULU

C.S.F. No. 21,036

August 28, 1989

WITHDRAWAL

PORTION OF GENERAL LEASE S-3848  
TO THE UNITED STATES OF AMERICA

Keawaula, Waianae, Oahu, Hawaii

Being a portion of the Government Land of Keawaula and Portion of the Railroad Right-of-Way in Waianae, as described in Item 6 of Schedule A with Grant Deed of the Territory of Hawaii to Oahu Railway and Land Company, dated April 29, 1903, recorded in Liber 249 on Pages 160-167 (Land Office Deed 939) and returned to the State of Hawaii by Oahu Railway and Land Company by Quitclaim Deed, dated September 11, 1961 and recorded in Liber 4135, Pages 239-240 (Land Office Deed S-18222), including Parcel F of Kaena Point State Park, Governor's Executive Order 3338.

Beginning at highwater mark at seashore at the west corner of this parcel of land and at the south corner of Parcel G of Kaena Point State Park, Governor's Executive Order 3338, the coordinates of said point of beginning referred to Government Survey Triangulation Station "KAENA POINT U.S.E." being 6788.02 feet South and 10,163.96 feet East as shown on Government Survey Registered Map H.S.S. Plat 2174-A, thence running by azimuths measured clockwise from True South:-

1. 215° 20' 3057.62 feet along Parcel G of Kaena Point State Park, Governor's Executive Order 3338;
2. 293° 52' 30" 2567.89 feet along Kaena Point Missile Tracking Site;
3. 258° 33' 540.47 feet along Kaena Point Missile Tracking Site;
4. Thence along the middle of Main Waianae Range along Kaena Point Missile Tracking Site, the direct azimuth and distance being:  
312° 00' 220.00 feet;

August 28, 1989

5. Thence along middle of Main Waianae Range along Public Shooting Ground and Game Reserve, Governor's Executive Order 1716, the direct azimuth and distance being:  
288° 28' 16" 195.06 feet;

Thence along the middle of Main Waianae Range along the Government Land of Kuaokala for the next eight (8) courses, the direct azimuths and distances between points on said middle of Main Waianae Range being:

- |     |             |               |
|-----|-------------|---------------|
| 6.  | 301° 26'    | 598.70 feet;  |
| 7.  | 298° 24'    | 883.70 feet;  |
| 8.  | 304° 50'    | 2055.20 feet; |
| 9.  | 336° 17'    | 935.50 feet;  |
| 10. | 230° 15'    | 820.00 feet;  |
| 11. | 270° 35'    | 510.00 feet;  |
| 12. | 331° 40'    | 530.00 feet;  |
| 13. | 33° 13' 30" | 224.10 feet;  |
14. Thence along the easterly bank of Kaluakauila Stream, the direct azimuth and distance being:  
69° 45' 05" 6585.20 feet;
15. 80° 00' 378.08 feet across Kaena Point Road, Project NO. R-AD 2(1) and along Parcel E of Kaena Point State Park, Governor's Executive Order 3338 to highwater mark at seashore;

Thence along highwater mark at seashore for the next three (3) courses, the direct azimuths and distances between points on said highwater mark being:

- |     |              |  |
|-----|--------------|--|
| 16. | 171° 03'     | 892.80 feet;   |
| 17. | 136° 10'     | 3710.00 feet;  |
| 18. | 132° 52' 45" | 486.42 feet to the point of beginning and containing a GROSS AREA of 758.0 ACRES, MORE OR LESS, and a NET AREA OF 732.768 ACRES, MORE OR LESS after excluding therefrom the following listed exclusions. |

C.S.F. No. 21,036

August 28, 1989

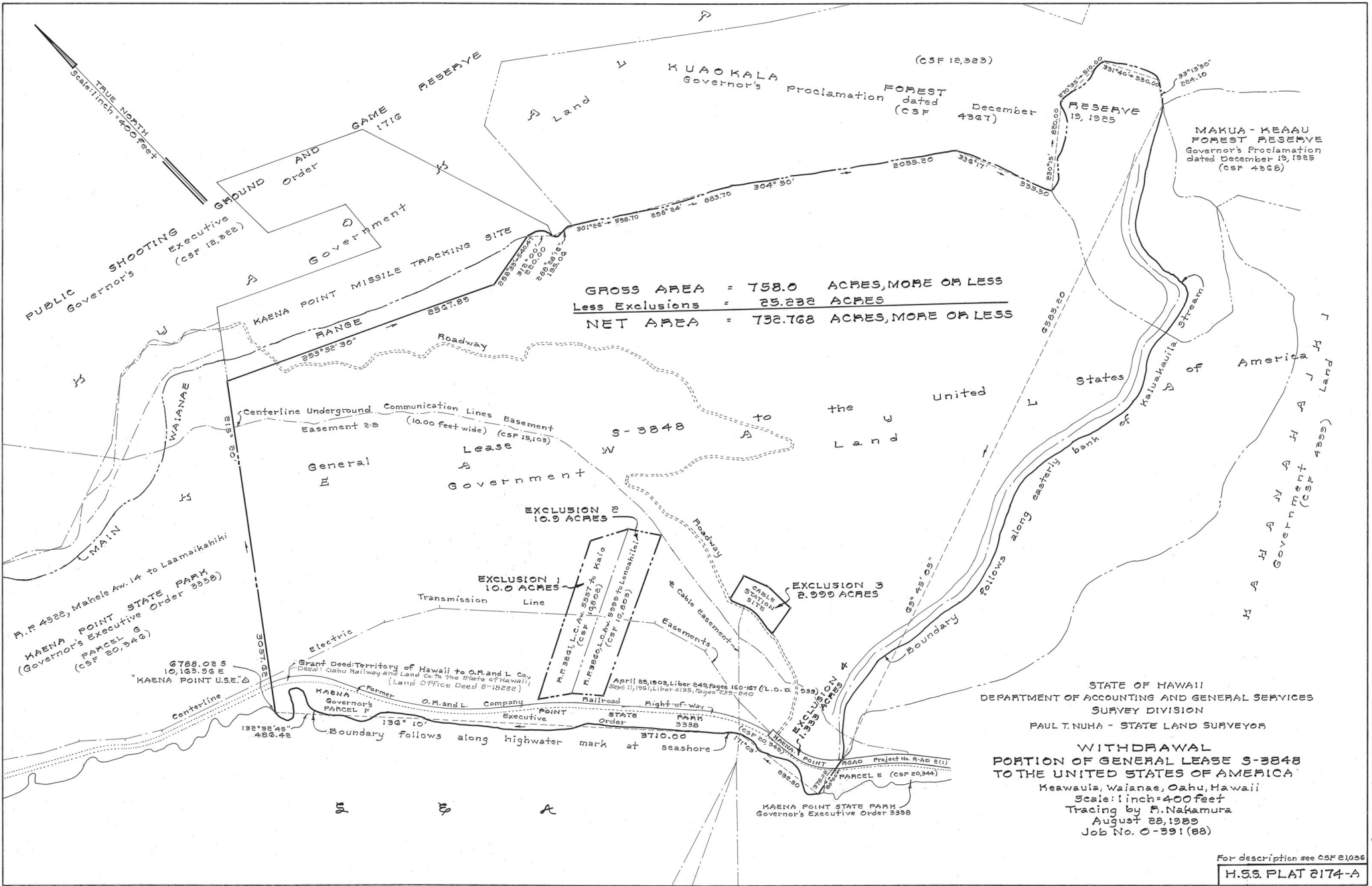
EXCLUSIONS

1. R.P. 3861, L.C.Aw. 5557 to Kaio	10.0 ACRES
2. R.P. 3860, L.C.Aw. 5999 to Lonoahilei	10.9 ACRES
3. Cable Station Site	2.999 ACRES
4. Portion of Kaena Point Road, Project No. R-AD 2(1)	<u>1.333</u> ACRES
	25.232 ACRES

SURVEY DIVISION  
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES  
STATE OF HAWAII

By: Raymond S. Nakamura  
Raymond S. Nakamura  
Land Surveyor gm

Compiled from H.S.S. Plat 2174,  
G.L. S-3848 and Gov't. Survey  
Records.



TRUE NORTH  
Scale: 1 inch = 400 feet

PUBLIC SHOOTING  
Governor's  
Executive  
Order  
(CSF 12,222)

KAENA POINT STATE PARK  
Governor's Executive  
Order 3332

P.R. 4322, Mahele Av. 14 to Laamakahiki  
KAENA POINT STATE PARK  
Governor's Executive  
Order 3332  
PARCEL G  
(CSF 20,342)

6788.02 S  
10,123.96 E  
"KAENA POINT USE"

KAENA POINT MISSILE TRACKING SITE  
Government

KAENA POINT MISSILE TRACKING SITE  
Range  
Government

Centerline Underground Communication Lines Easement  
Easement 25  
(10.00 feet wide)  
(CSF 19,103)  
General  
Lease  
Government

EXCLUSION 2  
10.9 ACRES

EXCLUSION 1  
10.0 ACRES

EXCLUSION 3  
2.999 ACRES

EXCLUSION 4  
1.199 ACRES

KAENA GOVERNOR'S PARCEL F  
Former  
O.M. and L. Company  
KAENA POINT STATE PARK  
Governor's Executive  
Order 3332

KAENA POINT STATE PARK  
Governor's Executive Order 3332

KUAOKALA  
Governor's Proclamation  
FOREST  
dated  
(CSF  
December  
19, 1925  
4327)

RESERVE  
19, 1925

MAKUA-KEAU  
FOREST RESERVE  
Governor's Proclamation  
dated December 19, 1925  
(CSF 4362)

STATE OF HAWAII  
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES  
SURVEY DIVISION  
PAUL T. NUHA - STATE LAND SURVEYOR

WITHDRAWAL  
PORTION OF GENERAL LEASE S-3848  
TO THE UNITED STATES OF AMERICA

Keawaula, Waianae, Oahu, Hawaii  
Scale: 1 inch = 400 feet  
Tracing by M. Nakamura  
August 28, 1989  
Job No. O-391 (89)

For description see CSF 21036

H.S.S. PLAT 2174-A

Tax Map Key: B-1-01

21" X 32" = 4.67 S.F.

# C.S.F. 13,652

CABLE STATION SITE AND ROADWAY AND CABLE EASEMENTS

Keawaula, Waiānāe, Oahu, Hawaii

See CSFs 14280, 14281, 20126, 20127, 20341, 22584, 24055

Furnished Land Department

April 5, 1962

Folder 493



STATE OF HAWAII

SURVEY DIVISION

DEPT. OF ACCOUNTING AND GENERAL SERVICES

HONOLULU

March 30, 1962

C.S.F. No. 13,652

CABLE STATION SITE AND ROADWAY AND CABLE EASEMENTS

Keawaula, Waianae, Oahu, Hawaii

Being portions of the Government Land of Keawaula

CABLE STATION SITE. Beginning at the southwest corner of this parcel of land and on the easterly side of the 20-Foot Roadway Easement described below, the coordinates of said point of beginning referred to Government Survey Triangulation Station "KAENA POINT U.S.E." being 9349.86 feet South and 13934.42 feet East, as shown on Government Survey Registered Map 4119, thence running by azimuths measured clockwise from True South:-

1. Along the easterly side of the 20-Foot Roadway Easement described below on a curve to the left with a radius of 501.20 feet, the chord azimuth and distance being: 182° 37' 18.95 feet;
2. 181° 32'                    96.39 feet along the easterly side of the 20-Foot Roadway Easement described below;
3. Thence along the easterly side of the 20-Foot Roadway Easement described below on a curve to the right with a radius of 265.96 feet, the chord azimuth and distance being: 184° 49' 15" 30.50 feet;
4. 188° 06' 30"            64.94 feet along the easterly side of the 20-Foot Roadway Easement described below;
5. Thence along the easterly side of the 20-Foot Roadway Easement described below on a curve to the left with a radius of 275.92 feet, the chord azimuth and distance being: 169° 24' 15" 176.97 feet;
6. 150° 42'                    19.59 feet along the easterly side of the 20-Foot Roadway Easement described below;
7. Thence along the easterly side of the 20-Foot Roadway Easement described below on a curve to the right with a radius of 220.00 feet, the chord azimuth and distance being: 161° 21' 25" 81.37 feet;

N 548.13	E 352.21		Coords	J.A.A 4/2/62
S 548.13	W 352.22	2.999	Adapted	Col. Bk 50
		Acres		Pg. 109

- 2 -

- |     |          |  |
|-----|----------|--|
| 8.  | 253° 44' | 250.00 feet along Government Land;   |
| 9.  | 338° 34' | 238.75 feet along Government Land;   |
| 10. | 357° 54' | 267.76 feet along Government Land;   |
| 11. | 78° 24'  | 290.00 feet along Government Land to the point of beginning and containing an Area of 2.999 Acres. |

Together with a Roadway Easement for ingress and egress thereto as shown on plan attached hereto and made a part hereof and more particularly described as follows:

Being a strip of land 20.00 feet wide and extending 10.00 feet on each side of the following-described centerline.

Beginning at the south end of this centerline, at its intersection with the existing coral road, the coordinates of said point of beginning referred to Government Survey Triangulation Station "KAENA POINT U.S.E." being 10078.70 feet South and 13,289.24 feet East, as shown on Government Survey Registered Map 4119, thence running by azimuths measured clockwise from True South:-

1. 256° 07' 30" 166.02 feet;
2. Thence on a curve to the left with a radius of 450.00 feet, the chord azimuth and distance being: 246° 38' 45" 148.22 feet;
3. 237° 10' 96.88 feet;
4. Thence on a curve to the left with a radius of 350.00 feet, the chord azimuth and distance being: 217° 46' 232.51 feet;
5. 198° 22' 286.07 feet;
6. Thence on a curve to the left with a radius of 491.20 feet, the chord azimuth and distance being: 189° 57' 143.79 feet;
7. 181° 32' 96.39 feet;
8. Thence on a curve to the right with a radius of 275.96 feet, the chord azimuth and distance being: 184° 49' 15" 31.65 feet;

J.A.A 4/1/62  
Calc. Bk 50  
Pg. 110  
10878.69 S  
289.24 E  
210.17  
50.17  
E

- 9. 183° 06' 30" 64.94 feet;
- 10. Thence on a curve to the left with a radius of 265.92 feet, the chord azimuth and distance being: 169° 24' 15" 170.55 feet;
- 11. 150° 42' 19.59 feet;
- 12. Thence on a curve to the right with a radius of 230.00 feet, the chord azimuth and distance being: 161° 21' 25" 85.07 feet and containing an Area of 31,019 Square Feet.

Also, together with a Cable Easement, as shown on plan attached hereto and made a part hereof and more particularly described as follows:-

Being a strip of land 10.00 feet wide and extending 5.00 feet on each side of the following-described centerline.

Beginning at the east end of this centerline and on the westerly boundary of the above-described Cable Station Site, the coordinates of said point of beginning referred to Government Survey Triangulation Station "KAENA POINT U.S.E." being: 9015.95 feet South and 13,938.92 feet East, as shown on Government Survey Registered Map 4119, thence running by azimuths measured clockwise from True South:-

- 1. 67° 24' 30" 225.99 feet;
- 2. 42° 47' 944.00 feet to highwater mark at seashore and containing an Area of 11,700 Square Feet.

SURVEY DIVISION  
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES  
STATE OF HAWAII

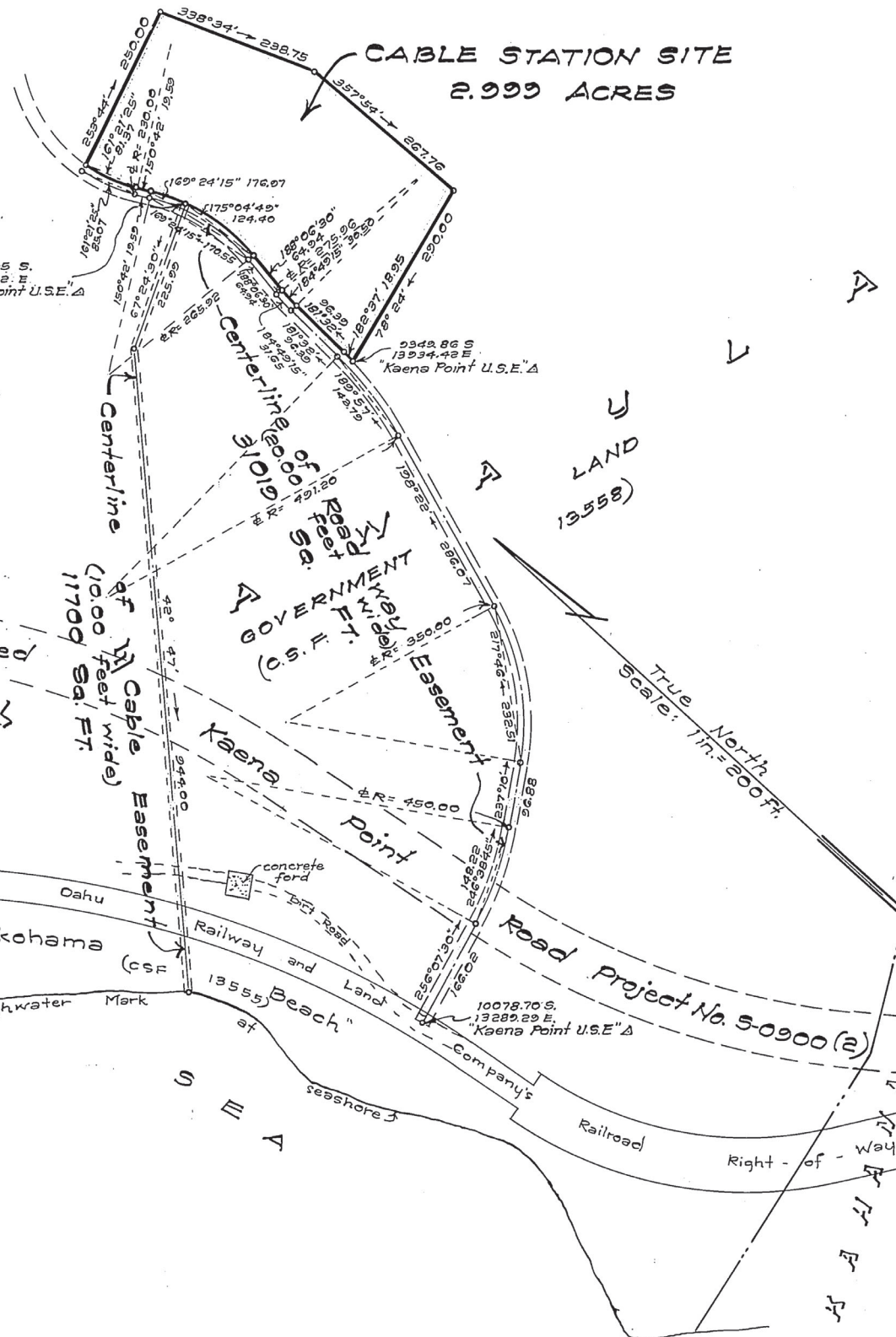
Compiled from data furn.  
by W.P. Thompson and  
Govt. Survey Records.

By: Robert T. Hashimoto  
Robert T. Hashimoto  
Land Surveyor

ac

E 117,00 9015.95 S J.A.A 4/1/62  
ok S.R.F.F. 13938.92 E Calc. Bk 50  
Pg. 110





**CABLE STATION SITE, ROADWAY AND CABLE EASEMENTS**  
Keawaula, Waianae, Oahu, Hawaii  
scale: 1 inch = 200 feet.

JOB 1022  
C.BK 13 (Hashimoto's)

TAX MAP: 8-1-01

C. S. F. No. 13652

SURVEY DIVISION  
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES  
STATE OF HAWAII

R.T.H. Mar. 30, 1962

# C.S.F. 16,802

KAENA POINT STATE PARK

PARCEL 50

Keawaula, Waianae, Oahu, Hawaii

Final Order of Condemnation (Case # 28599) - Elisabeth Lay Marko, et al. to  
State of Hawaii 12-16-75 EK 11766 Pg 577 (Case # 28599)

57176  
Furnished by Attorney General  
January 24, 1973

Folder 136-C



STATE OF HAWAII

SURVEY DIVISION

DEPT. OF ACCOUNTING AND GENERAL SERVICES

HONOLULU

January 16, 1973

C.S.F. No. 16,802

KAENA POINT STATE PARK

PARCEL 50

Keawaula, Waianae, Oahu, Hawaii

Being all of R.P. 3861, L.C.Award 5557 to Kaio.

Ehoomaka ma ke kihi hema e hele ana,

Ak. 53° Kom. 4.50 kh. ma ke Ala Aupuni, malaila aku,

Ak. 37° Hik. i 23.00 kh. ma ka palena Kula o Kon.

a hiki i ka pali, malaila aku,

Hem. 66° Hik. i 4.50 kh. ma ka acao pali, malaila aku,

Hem. 37° Kom. i 24.00 kh. ma ka palena aina o Lonoahilei,

a hiki i ka hoomaka ana.

10 eka

SURVEY DIVISION  
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES  
STATE OF HAWAII

By: Robert T. Hashimoto  
Robert T. Hashimoto  
Land Surveyor

ac

Copied from original  
L.C.Aw. 5557.

Compared with L.C.A. bk. filed in H. Off.	
Checked By <u>S. Hasegawa</u>	Date: <u>1/16/73</u>
Cal. Book No. _____	Page _____
Closure _____	

R.P. 3861, L.C.AWARD 5557 TO KAIIO

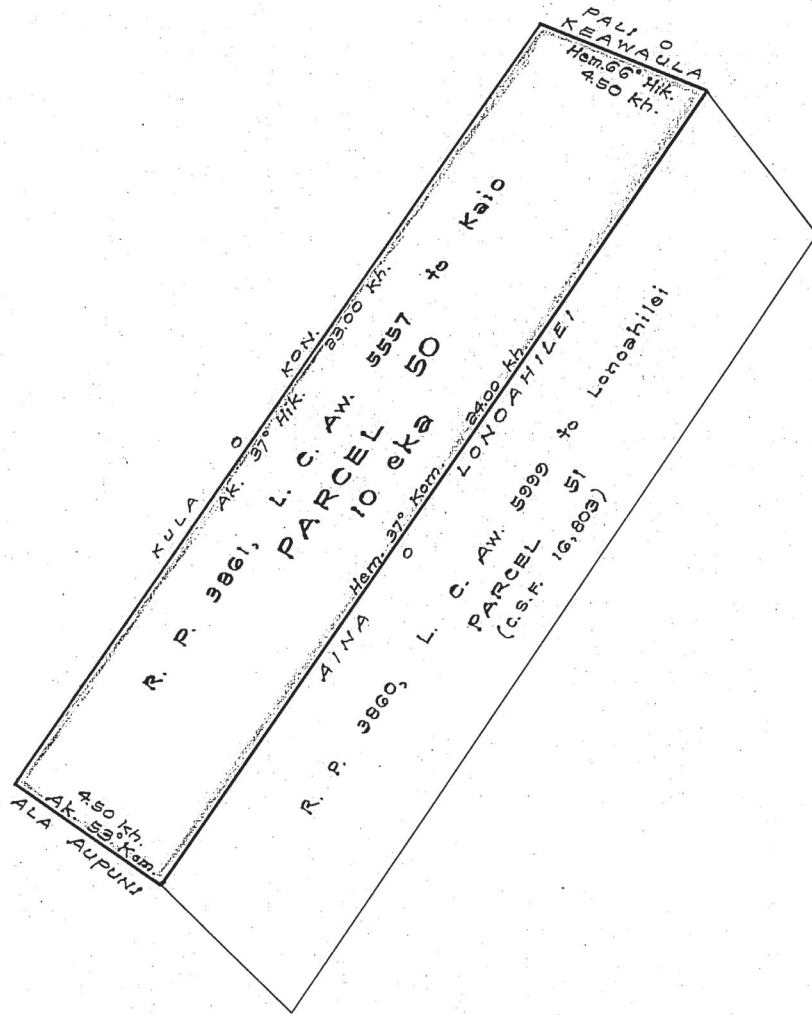
Beginning at the south corner of this land and

running

N 53° W	4.50 chains along Government Road, thence
N 37° E	23.00 chains along the boundary of the konohiki Kula land to the pali, thence
S 66° E	4.50 chains along the side of the pali, thence
S 37° W	24.00 chains along the boundary of the land of Lonoahilei to the point of beginning

10 Acres.

Scale: 1" = 4 Chains



KAENA POINT STATE PARK  
PARCEL 50

R.P. 3861, L.C.A.W. 5557 to Kai'o  
Keawsula, Waianae, Oahu, Hawaii

JOB No. O-4812  
C. BK

Compiled from Book 4, Page 212  
of Book of Land Commission Awards.

TAX MAP 8-1-01

SURVEY DIVISION  
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES

C. S. F. No. 16,802

STATE OF HAWAII

C.S.O. Jan. 16, 1973

# C.S.F. 16,803

KAENA POINT STATE PARK

PARCEL 51

Keawaula, Waianae, Oahu, Hawaii

Final Order of Condemnation (Civil 22599) - Elizabeth Loy Marks, et al vs  
State of Hawaii 12-16-72 PK 11266 Pg 559 (L.O.D. S-26579)

1/24/73, 22599

Furnished by Attorney General  
January 24, 1973

Folder 136-C



STATE OF HAWAII

SURVEY DIVISION

DEPT. OF ACCOUNTING AND GENERAL SERVICES

HONOLULU

January 16, 1973

C.S.F. No. 16,803

KAENA POINT STATE PARK

PARCEL 51

Keawaula, Waianae, Oahu, Hawaii

Being all of R.P. 3860, L.C.Award 5999 to Lonoahilei.

Ehoomaka ma ke kihi he e hele ana,

A.  $43\frac{1}{2}^{\circ}$  Ko. i 4.50 kh. ma ka palena ala aupuni, malaila aku,  
A.  $37^{\circ}$  Hi. i 24.00 kh. ma ka palena aina o Kaio, malaila aku,  
He.  $35^{\circ}$  Hi. i 4.50 kh. ma ka pali o Keawaula, malaila aku,  
He.  $37\frac{1}{2}^{\circ}$  Ko. i 23.50 kh. ma ka palena kula o Konohiki, a hiki i  
hoomaka ai.

10.9 eka

SURVEY DIVISION  
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES  
STATE OF HAWAII

By: Robert T. Hashimoto  
Robert T. Hashimoto  
Land Surveyor

ac

Copied from original  
L.C.Aw. 5999.

Compared with LCA Bk. filed in Ld. Off.	
Checked By <u>S. Hasegawa</u>	Date: <u>1/16/73</u>
Cal. Book No. _____	Page _____
Closure _____	

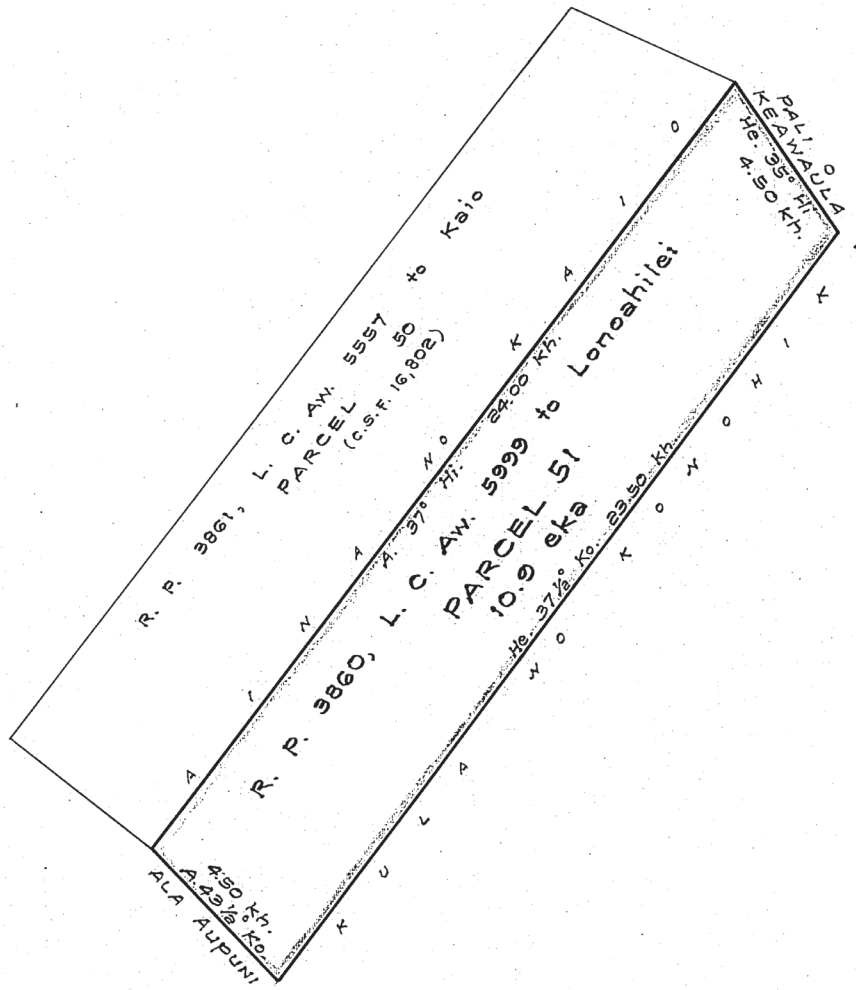
R.P. 3860, L.C.AWARD 5999 TO LONOAHIIEI

Beginning at the south corner of this land and  
running

N 43-1/2° W	4.50 chains along Government road, thence
N 37° E	24.00 chains along the boundary of the land of Kaio, thence
S 35° E	4.50 chains along the pali of Keawaula, thence
S 37-1/2° W	23.50 chains along the boundary of the Konohiki Kula land to the point of beginning

10.9 Acres.





Scale: 1" = 4 chains

**KAENA POINT STATE PARK  
PARCEL 51**

**R. P. 3860, L. C. Aw. 5999 to Lonoahilei  
Keawaula, Waianae, Oahu, Hawaii**

JOB No. O-4812  
C. BK

Compiled from Book 6, Page 238  
of Book of Land Commission Awards.

TAX MAP: 8-1-01

SURVEY DIVISION  
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES

C. S. F. No. 16,803

STATE OF HAWAII

C.S.O. Jan. 16, 1973



Appendix H

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# **Biological Resources Information**

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## Appendix H

# BIOLOGICAL RESOURCES INFORMATION

Table H-1: USGS Vegetation Classes	
USGS Vegetation Class	Vegetation Class Composition
Non-native* Forest	Mixed, dense non-native tree canopy species, with dominants including: <i>Eucalyptus</i> , <i>Casuarina</i> , <i>Falcataria</i> , <i>Araucaria</i> , <i>Fraxinus</i> , <i>Melaleuca</i> , <i>Psidium</i> , and <i>Grevillea</i> spp.
Non-native* Grassland	Uncharacterized mixed non-native grasslands of complex vegetation mosaics of grass, shrubs, and trees dominated by <i>Cenchrus setaceus</i> (fountaingrass), <i>Cenchrus ciliaris</i> (buffelgrass), <i>Cenchrus clandestinum</i> (kikuyu grass) and other species.
Non-native* Shrubland	Highly variable mixed shrubland dominated locally by one or more species, including <i>Lantana camara</i> ( <i>Lantana camara</i> ), <i>Leucaena leucocephala</i> (white leadtree/koa haole), <i>Schinus terebinthifolius</i> (Christmas berry), <i>Acacia farnesiana</i> var. <i>farnesiana</i> (klu), and others.
Closed Ohia Forest	Vegetation dominated by a closed canopy of <i>Metrosideros polymorpha</i> (‘ōhi‘a lehua) and other native trees, with varying understories dominated by <i>Cibotium</i> spp, native shrubs or <i>Dicranopteris linearis</i> (Old World forkfern/uluhe), generally on moderate mesic to wet slopes from lowland to montane elevations.
Cultivated Cropland	Planted lands of variable physiognomy, with annual to multi-year stability. May include ordered rows of tree plantings, includes a wide variety of dominants.
Developed, High Intensity	Contains little or no vegetation, includes heavily built-up urban centers as well as large constructed surfaces.
Developed, Low Intensity	Contains substantial amounts of constructed surface mixed with substantial amounts of vegetated surface.
Kiawe Forest and Shrubland	Vegetation dominated by an open to closed canopy of the non-native shrub/tree <i>Prosopis pallida</i> (mesquite/kiawe), with an understory of non-native grasses (e.g. <i>C. ciliaris</i> )
Mixed Native- Non-native* Forest	Vegetation dominated by a mixture of non-native and native trees, typically along the transition between native-dominated forest and Non-native Forest.
Mixed Native- Non-native* Shrubs and Grasses	Vegetation dominated by a mixture of mostly native shrubs and non-native grasses.
Native Shrubland / Sparse ‘Ōhi‘a (native shrubs)	Vegetation dominated by shrubs with dominants that include <i>Leptecophylla</i> (pūkiawe), <i>Dodonaea</i> (‘a‘ali‘i), and <i>M. polymorpha</i> .
‘Ōhi‘a Forest	A composite ‘Ōhi‘a Forest class for which canopy closure and dominant understory assemblage is variable and/or indeterminate.

Table H-1: USGS Vegetation Classes	
USGS Vegetation Class	Vegetation Class Composition
Open Koa-‘Ōhi‘a Forest	Vegetation dominated by an open canopy of <i>Acacia koa</i> (koa), <i>M. polymorpha</i> , and other native trees, with an understory dominated by <i>Cibotium</i> spp. (hāpu‘u), grass, and native shrubs.
Open ‘Ōhi‘a Forest	Vegetation dominated by an open canopy of <i>M. polymorpha</i> and other native trees, with an understory dominated by <i>Cibotium</i> spp. tree ferns ( <i>Cibotium</i> spp.), Non-native grasses, native shrubs.
Open Water	Inland water bodies and coastal fish ponds of at least 0.9 acres in area.
Uluhe Shrubland	Vegetation dominated by a shrubland (technically a fernland) of <i>D. linearis</i> and/or other native mat ferns, generally on moderate and steep mesic to wet slopes from lowland to montane elevations, typically on windward island slopes.
Uncharacterized Forest	Open-closed canopy forest of naturalized non-native vegetation in a mosaic of forest, shrubland and grassland with small occurrences of native forest.
Uncharacterized Shrubland	Mixed, typically closed shrub vegetation, naturalized non-native vegetation in a mosaic of surrounding forest, shrubland, and grassland. May also include small occurrences of native shrubland.
Very Sparse Vegetation to Unvegetated	Largely unvegetated, typically open lava or cinder substrates occupying dry settings at subalpine and alpine elevations.

\* USGS documents use the term “alien”; for consistency with other Army documents “alien” has been replaced with “non-native”.

Source: USGS, 2016

<b>Table H-2: KTA Vegetation Classes</b>			
<b>Vegetation Class</b>	<b>Acres Occupied Within Kahuku Training Area</b>	<b>Acres Occupied Within Tract A-1<sup>1</sup></b>	<b>Acres Occupied Within Tract A-3<sup>1</sup></b>
Non-native Forest	7223.3	296.4	642.3
Non-native Grassland	551.8	117.9	0.0
Non-native Shrubland	833.2	85.4	0.4
Closed ‘Ōhi‘a Forest	220.9	0.0	45.7
Cultivated Cropland	7.5	0.0	0.0
Developed, Low Intensity	2.5	0.0	0.0
Kiawe Forest and Shrubland	11.4	2.4	0.0
Native Shrubland / Sparse ‘Ōhi‘a (native shrubs)	39.8	0.0	12.8
Open Koa-‘Ōhi‘a Forest	349.7	0.0	57.6
Open ‘Ōhi‘a Forest	143.5	0.0	0.0
Open Water	2.7	0.0	0.0
Uluhe Shrubland	35.4	0.0	4.7
Uncharacterized Shrubland	5.7	0.0	0.0
Very Sparse Vegetation to Unvegetated	17.4	1.3	0.0
Undefined	3.1	0.0	0.0
<b>Totals<sup>2</sup></b>	<b>9447.9</b>	<b>503.4</b>	<b>763.6</b>

1. Calculations based on State-owned land + 100-foot buffer.
2. USGS GIS calculations differ from Army GIS calculations due to mapping differences.

Source: USGS, 2016

Table H-3: KTA Native Species	
Scientific Name	Common, Local
<b>Plants</b>	
<i>Acacia koa</i>	koa
<i>Adenophorus hymenophylloides</i>	No common name
<i>Adenophorus pinnatifidus</i>	No common name
<i>Adenophorus tamariscinus</i>	Wahine noho mauna
<i>Adenophorus tenellus</i>	kolokolo
<i>Alyxia stellata</i>	maile
<i>Antidesma platyphyllum</i>	hame
<i>Asplenium nidus</i>	bird’s-nest ferns, ‘ekaha,
<i>Bidens macrocarpa</i>	ko’oko’olau
<i>Bidens torta</i>	ko’oko’olau
<i>Bobea elatior</i>	‘ahakea lau nui
<i>Bobea timonioides</i>	‘ahakea
<i>Carex meyenii</i>	kāluhāluhā
<i>Carex wahuensis</i>	kāluhāluhā
<i>Ceodes umbellifera</i>	pāpala kēpau
<i>Cheirodendron platyphyllum</i>	lapalapa
<i>Cibotium chamissoi</i>	treefern, hāpu‘u
<i>Cibotium glaucum</i>	treefern, hāpu‘u
<i>Cibotium menziesii</i>	hāpu‘u
<i>Cocculus orbiculatus</i>	hue‘ie
<i>Coleus australis</i>	‘ala‘ala wai nui wahine
<i>Crepidomanes draytonianum</i>	No common name
<i>Crepidomanes parvulum</i>	No common name
<i>Deparia prolifera</i>	No common name
<i>Dianella sandwicensis</i>	‘uki‘uki
<i>Dicranopteris linearis</i>	unuhe
<i>Diospyros hillebrandii</i>	lama
<i>Diospyros sandwicensis</i>	lama
<i>Diplazium sandwichianum</i>	pohole
<i>Diplopterygium pinnatum</i>	uluhe lau nui
<i>Dodonaea viscosa</i>	‘a‘ali‘i



Table H-3: KTA Native Species	
Scientific Name	Common, Local
<i>Doodia kunthiana</i>	‘ōkupukupulauli‘i
<i>Dracaena halapepe</i>	halapepe
<i>Elaeocarpus bifidus</i>	kalia
<i>Elaphoglossum crassifolium</i>	No common name
<i>Elaphoglossum paleaceum</i>	‘ēkaha
<i>Elaphoglossum pellucidum</i>	hoe-a-Māui
<i>Freycinetia arborea</i>	‘le‘ie
<i>Gahnia aspera</i> subsp. <i>globosa</i>	No common name
<i>Gahnia beecheyi</i>	No common name
<i>Huperzia serrata</i>	No common name
<i>Hydrangea arguta</i>	kanawao
<i>Hymenophyllum recurvum</i>	No common name
<i>Ilex anomala</i>	kāwa‘u
<i>Kadua affinis</i>	manono
<i>Korthalsella complanata</i>	hulumoa
<i>Korthalsella cylindrica</i>	hulumoa
<i>Lepisorus thunbergianus</i>	pākahakaha
<i>Leptecophylla tameiameia</i>	‘a‘ali‘i mahu
<i>Machaerina angustifolia</i>	‘uki
<i>Machaerina mariscoides</i>	‘ahaniu
<i>Melicope clusiifolia</i>	alani
<i>Melicope oahuensis</i>	alani
<i>Melicope peduncularis</i>	alani
<i>Melicope sandwicensis</i>	alani
<i>Melicope spathulata</i>	pilo kea
<i>Metrosideros macropus</i>	‘ōhi‘a lehua
<i>Metrosideros polymorpha</i> var. <i>glaberrima</i>	‘ōhi‘a lehua
<i>Metrosideros polymorpha</i> var. <i>incana</i>	‘ōhi‘a lehua
<i>Metrosideros polymorpha</i> var. <i>polymorpha</i>	‘ōhi‘a lehua
<i>Metrosideros polymorpha</i> var. <i>pumila</i>	‘ōhi‘a lehua
<i>Metrosideros rugosa</i>	‘ōhi‘a lehua
<i>Microlepia strigosa</i> var. <i>strigosa</i>	palapalai

<b>Table H-3: KTA Native Species</b>	
<b>Scientific Name</b>	<b>Common, Local</b>
<i>Myoporum sandwicense</i>	bastard sandalwood, naio
<i>Nephrolepis cordifolia</i>	No common name
<i>Nephrolepis exaltata</i> subsp. <i>hawaiiensis</i>	ni‘ani‘
<i>Nertera granadensis</i>	mākole
<i>Nestegis sandwicensis</i>	olopua
<i>Ochrosia compta</i>	hōlei
<i>Odontosoria chinensis</i>	palapala‘ā
<i>Ophioderma pendula</i>	puapuamoa
<i>Oreogrammitis hookeri</i>	No common name
<i>Osteomeles anthyllidifolia</i>	ūluehe
<i>Palhinhaea cernua</i>	wāwae‘iole
<i>Pandanus tectorius</i>	hala
<i>Paratrophis pendulina</i>	a‘ia‘i
<i>Paspalum scrobiculatum</i>	rice grass
<i>Perrottetia sandwicensis</i>	olomea
<i>Phlegmariurus phyllantha</i>	No common name
<i>Phyllostegia grandiflora</i>	kapana
<i>Pipturus albidus</i>	māmaki
<i>Pittosporum confertiflorum</i>	hō‘awa
<i>Pittosporum flocculosum</i>	hō‘awa
<i>Pittosporum glabrum</i>	hō‘awa
<i>Planchonella sandwicensis</i>	‘āla‘a
<i>Plumbago zeylanica</i>	‘ilie‘e
<i>Polyscias oahuensis</i>	‘ohe mauka
<i>Pritchardia bakeri</i>	loulu
<i>Pritchardia martii</i>	loulu
<i>Pseudophegopteris keraudreniana</i>	false beach fern
<i>Psilotum complanatum</i>	moa nahele
<i>Psilotum nudum</i>	moa nahele
<i>Psychotria fauriei</i>	kōpiko
<i>Psychotria mariniana</i>	kōpiko
<i>Psydrax odorata</i>	alaha‘e

Table H-3: KTA Native Species	
Scientific Name	Common, Local
<i>Pteridium aquilinum</i> subsp. <i>decompositum</i>	bracken, kilau
<i>Rauvolfia sandwicensis</i>	hao
<i>Rhynchospora rugosa</i> subsp. <i>lavarum</i>	kuolohia
<i>Rhynchospora sclerioides</i>	kuolohia
<i>Rockia sandwicensis</i>	pāpala kēpau
<i>Sadleria cyatheoides</i>	‘ama‘u
<i>Sadleria pallida</i>	‘ama‘u
<i>Sadleria souleyetiana</i>	‘ama‘u
<i>Sadleria squarrosa</i>	‘ama‘u
<i>Santalum freycinetianum</i> var. <i>freycinetianum</i>	‘iliahi
<i>Sapindus oahuensis</i>	lonomea
<i>Scaevola gaudichaudiana</i>	mountain naupaka, naupaka kuahiwi
<i>Scaevola glabra</i>	‘ohe naupaka
<i>Scaevola mollis</i>	naupaka kuahiwi
<i>Schizaea robusta</i>	No common name
<i>Selaginella arbuscula</i>	lepelepeamo
<i>Sida fallax</i>	‘ilima
<i>Sideroxylon polynesicum</i>	keahi
<i>Smilax melastomifolia</i>	aka‘awa
<i>Solanum americanum</i>	glossy nightshade, pōpolo
<i>Sphaerocionium lanceolatum</i>	No common name
<i>Sphaerocionium obtusum</i>	No common name
<i>Stenogrammitis saffordii</i>	kihe
<i>Syzygium sandwicense</i>	‘ōhi‘a ‘ai
<i>Tectaria gaudichaudii</i>	‘iwa‘iwa lau nui
<i>Trematolobelia macrostachys</i>	koli‘i
<i>Vaccinium calycinum</i>	‘ōhelo
<i>Waltheria indica</i>	‘uhaloa
<i>Wikstroemia oahuensis</i> var. <i>oahuensis</i>	kauhi
<i>Wikstroemia uva-ursi</i>	kauhi
<i>Xylosma hawaiiense</i>	a‘e
<i>Zanthoxylum dipetalum</i> var. <i>dipetalum</i>	kāwa‘u

<b>Table H-3: KTA Native Species</b>	
<b>Scientific Name</b>	<b>Common, Local</b>
<b>Invertebrates</b>	
<i>Anax strenuous</i>	Hawaiian great darner
<i>Blackburnia fossipennis</i>	No common name
<i>Blackburnia fraterna</i>	No common name
<i>Blackburnia mutabilis</i>	No common name
<i>Blackburnia palmae</i>	No common name
<i>Campsicnemus ornatus</i>	No common name
<i>Drosophila craddockae</i>	No common name
<i>Drosophila crucigera</i>	No common name
<i>Drosophila punalua</i>	No common name
<i>Enicospilus</i> spp.	No common name
<i>Entomobyra</i> spp.	No common name
<i>Eucoilidae</i> spp.	No common name
<i>Forcipomyia hardyi</i>	No common name
<i>Forcipomyia kaneohe</i>	No common name
<i>Hyalopeplus pellucidus</i>	No common name
<i>Hyposmocoma</i> spp.	No common name
<i>Lamellidea</i> spp.	No common name
<i>Limonia hawaiiensis</i>	No common name
<i>Limonia jacobae</i>	No common name
<i>Limonia perkinsi</i>	No common name
<i>Limonia stygipennis</i>	No common name
<i>Mecyclothorax acherontius</i>	No common name
<i>Megalagrion koelense</i>	No common name
<i>Mestolobes minuscula</i>	Hawaiian mestolobes crambid moth
<i>Microvelia vagans</i>	No common name
<i>Nabis kerasphoros</i>	No common name
<i>Nesogonia blackburni</i>	No common name
<i>Orthocladus</i> spp.	No common name
<i>Proterhinus</i> spp.	No common name
<i>Scaptomyza</i> spp.	No common name
<i>Schrankia</i> spp.	No common name

<b>Table H-3: KTA Native Species</b>	
<b>Scientific Name</b>	<b>Common, Local</b>
<i>Scotorythra rara</i>	scotorythra moth
<i>Seira</i> spp.	No common name
<i>Sierola kahuku</i>	No common name
<i>Sierola waianaean</i>	No common name
<i>Tornatellides</i> spp.	No common name
<i>Trioza</i> spp.	No common name
<b>Fish</b>	
<i>Awaous</i> spp.	goby
<i>Sicyopterus stimpsoni</i>	'o'opu nopili

Source: USAG-HI, 2010b; DLNR, 2015a

**Table H-4: Protected Species on State-Owned Land at KTA**

<b>Plants</b>
<p><b><i>Polyscias gymnocarpa</i> ('ohe 'ohe):</b> This federally endangered species is a long-lived perennial tree and a member of the Araliaceae (ginseng) family. It grows 8 to 33 feet tall with leaves that are odd-pinnately compound with leathery leaflets. It prefers lowland wet, lowland mesic, and wet cliff ecosystems under 3,330-feet in elevation with a range from 50 to greater than 75 inches of annual rainfall. The current statewide population estimate is 63 individuals over 11 locations (USFWS, 2019a). There was a single <i>P. gymnocarpa</i> individual historically documented on the southern edge of Tract A-3; however, subsequent attempts to relocate this tree have been unsuccessful, and ANRPO suspects this individual may have died (Kawelo, 2022c). The single individual on Tract A-3 represents 1.6 percent of the statewide population.</p>
<b>Invertebrates (Historical)</b>
<p><b><i>Achatinella</i> species (O’ahu tree snails):</b> An archival survey of <i>Achatinella</i> snail species completed in 1983 found that four species: <i>A. livida</i>, <i>A. sowerbyana</i>, <i>A. valida</i>, and <i>A. dimorpha</i> were historically present at KTA since the 1930s. <i>A. livida</i> and <i>A. sowerbyana</i> are both federally and State-listed as endangered; <i>A. dimorpha</i> was last documented in 1967 and <i>A. valida</i> was last documented in 1951, both are now presumed extinct (Christensen, 1983). None of the documented instances appear to be on State-owned land; however, presumed snail habitat is potentially located in the southeastern portion of Tract A-2 (Christensen, 1983). The Army has conducted surveys of endangered snail species at KTA and no endangered species have been documented, this is attributed to the fact that KTA no longer has suitable snail habitat due to the low elevation range. All relevant data regarding endangered snail species is documented and shared between participating agencies. To safeguard these species, these data are not publicly available (Kawelo, 2024).</p>
<b>Mammals</b>
<p><b><i>Aeorestes semotus</i> (Hawaiian Hoary Bat, 'ōpe'ape'a):</b> 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. No Hawaiian hoary bat roosts have been observed or detected at KTA, but passive acoustic detection of the bat has occurred at five locations on U.S. Government-controlled land at KTA (UH &amp; USGS, ND). ANRPO staff conduct spot surveys for bats roosting in trees that need to be pruned or removed at Army installations during the bat pupping season each year. During 2023, 20 bat surveys were conducted over 11 hours and 71 trees were screened (ANRPO, 2023). While there are no population estimates for this species, according to the 2018 USFWS 5-Year Status Review for Hawaiian hoary bat, the species has been confirmed to be widely distributed and breeding on O’ahu (USFWS 2021a).</p>

Table H-5: KTA Invasive Plant Species		
Scientific Name	Common, Local	Key
<i>Acacia mangium</i>	hickory wattle	1, 2
<i>Ardisia elliptica</i>	shoebuttton	2
<i>Arthrostemum ciliatum</i>	No common name	–
<i>Casuarina equisetifolia</i>	Australian pine	–
<i>Casuarina glauca</i>	gray sheoak	–
<i>Cenchrus setaceus</i>	fountaingrass	1, 2, 3
<i>Chrysophyllum oliviforme</i>	satin leaf	–
<i>Clidemia hirta</i>	soap bush, kaurasiga	2
<i>Chromolaena odorata</i>	devil weed	1, 3, 4
<i>Elaeocarpus grandis</i>	quandong, blue marble	1
<i>Eucalyptus robusta</i>	swamp mahogany	–
<i>Grevillea robusta</i>	silk oak	–
<i>Lantana camara</i>	lantana	–
<i>Leucaena leucocephala</i>	white lead tree	–
<i>Macaranga mappia</i>	pengua	3
<i>Melochia umbellata</i>	hierba del soldado	1
<i>Nephrolepis multiflora</i>	Asian sword fern	1
<i>Passiflora edulis</i>	passionfruit	–
<i>Pasiflora suberosa</i>	corky stem passion flower	–
<i>Pimenta dioica</i>	all spice	–
<i>Psidium cattleianum</i>	strawberry guava	3
<i>Psidium guajava</i>	guava	–
<i>Rhodomyrtus tomentosus</i>	rose myrtle	1, 2
<i>Rubus rosifolius</i>	thimbleberry	–
<i>Schinus terebinthifolius</i>	Brazilian pepper tree	3
<i>Schizachyrium condensatum</i>	bush beardgrass	1
<i>Senecio madagascarensis</i>	Madagascar ragwort	1
<i>Sideroxylon persimile</i>	bully tree	1
<i>Sphaeropteris cooperi</i>	Australian tree fern	1
<i>Syzygium jambos</i>	rose apple	–

1. Controlled and eradicated when found in protected plant species areas
2. State-listed noxious weeds list
3. Hawai‘i Invasive Species Council Invasive Species list
4. O‘ahu Invasive Species Committee list

Source: USAG-HI, 2010b; Kawelo, 2022a; USDA 2003; HISC, 2022; USDA, 2012; OISC, 2022.

<b>Table H-6: Poamoho Vegetation Classes</b>			
<b>Vegetation Class</b>	<b>Acres Occupied Within Poamoho Training Area</b>	<b>Acres Occupied Within Poamoho Tract<sup>1</sup></b>	<b>Acres Occupied Within Proposed NAR Tract<sup>1</sup></b>
Non-native Forest	1878.3	1670.9	282.0
Non-native Grassland	0.8	0.8	0.0
Non-native Shrubland	7.6	7.6	0.8
Closed ‘Ōhi‘a Forest	1045.1	733.2	340.1
Native Shrubland / Sparse ‘Ōhi‘a (native shrubs)	227.3	74.1	170.8
Native Wet Cliff Vegetation	0.0	0.0	1.4
‘Ōhi‘a Forest	97.5	0.0	102.6
Open Koa-‘Ōhi‘a Forest	447.4	435.1	12.3
Open ‘Ōhi‘a Forest	682.9	373.0	332.0
Uluhe Shrubland	23.4	1.3	28.1
Uncharacterized Forest	0.0	0.0	0.1
<b>Totals <sup>2</sup></b>	<b>4410.3</b>	<b>3296.0</b>	<b>1270.1</b>

1. Calculations based on State-owned land + 100-foot buffer.
2. USGS GIS calculations differ from Army GIS calculations due to mapping differences.

Source: USGS, 2016



Table H-7: Poamoho Native Species	
Scientific Name	Common, Local
<b>Plants</b>	
<i>Acacia koa</i>	koa
<i>Adenophorus tamariscinus</i>	wahine noho mauna
<i>Alyxia stellata</i>	maile
<i>Antidesma platyphyllum</i>	hame
<i>Antidesma</i> spp.	hame
<i>Bidens macrocarpa</i>	ko‘oko‘olau
<i>Bobea elatior</i>	‘ahakea lau nui
<i>Bobea</i> spp.	‘ahakea
<i>Carex wahuensis</i>	No common name
<i>Cheirodendron platyphyllum</i>	lapalapa
<i>Cheirodendron trigynum</i>	‘ōlapa
<i>Cibotium chamissoi</i>	hāpu‘u
<i>Cibotium glaucum</i>	hāpu‘u
<i>Cibotium menziesii</i>	hāpu‘u
<i>Cibotium</i> spp.	hāpu‘u
<i>Clermontia oblongifolia</i>	ohawai
<i>Coprosma foliosa</i>	pilo
<i>Coprosma longifolia</i>	pilo
<i>Cyclosorus cyatheoides</i>	kikawaiō
<i>Cyrtandra hawaiiensis</i>	ha‘iwale
<i>Cyrtandra paludosa</i>	ha‘iwale
<i>Cyrtandra</i> spp.	ha‘iwale
<i>Deparia marginalis</i>	No common name
<i>Deparia prolifera</i>	No common name
<i>Dianella sandwicensis</i>	‘uki‘uki
<i>Dichantherium koolauense</i>	No common name
<i>Dicranopteris linearis</i>	uluhe
<i>Diplazium sandwichianum</i>	pohole
<i>Diplopterygium pinnatum</i>	uluhe lau nui
<i>Doodia lyonii</i>	Lyon’s hacksaw fern
<i>Dubautia laxa</i>	na‘ena‘e pua melemele

Table H-7: Poamoho Native Species	
Scientific Name	Common, Local
<i>Dubautia plantaginea</i>	na‘ena‘e
<i>Elaeocarpus bifidus</i>	kalia
<i>Euphorbia clusiifolia</i>	‘akoko
<i>Freycinetia arborea</i>	‘ie‘ie
<i>Huperzia serrata</i>	No common name
<i>Hydrangea arguta</i>	kanawao
<i>Ilex anomala</i>	kawa‘u
<i>Isachne distichophylla</i>	No common name
<i>Isachne pallens</i>	No common name
<i>Kadua affinis</i>	manono
<i>Kadua centranthoides</i>	No common name
<i>Kadua fosbergii</i>	manono
<i>Labordia sessilis</i>	kāmakahala
<i>Labordia</i> spp.	Kāmakahala
<i>Lindsaea repens</i>	No common name
<i>Lindsaea repens</i> var. <i>macraeana</i>	No common name
<i>Lobelia gaudichaudii</i>	No common name
<i>Lycopodium cernua</i>	wawae ‘iole
<i>Machaerina angustifolia</i>	‘uki
<i>Machaerina mariscoides</i>	‘ahaniu, ‘uki
<i>Melicope clusiifolia</i>	alani
<i>Melicope hosakae</i>	No common name
<i>Melicope oahuensis</i>	alani
<i>Melicope</i> spp.	alani
<i>Metrosideros macropus</i>	‘ōhi‘a
<i>Metrosideros polymorpha</i> var.	‘ōhi‘a
<i>Metrosideros rugosa</i>	‘ōhi‘a
<i>Metrosideros tremuloides</i>	‘ōhi‘a
<i>Microlepia strigosa</i>	palapalai
<i>Nephrolepis cordifolia</i>	No common name
<i>Odontosoria chinensis</i>	pala‘a
<i>Peperomia oahuensis</i>	‘ala‘ala wai nui

<b>Table H-7: Poamoho Native Species</b>	
<b>Scientific Name</b>	<b>Common, Local</b>
<i>Perrottetia sandwicensis</i>	‘ala‘ala wai nui
<i>Phyllostegia glabra</i>	kapana
<i>Phyllostegia grandiflora</i>	kapana
<i>Pipturus albidus</i>	māmaki
<i>Pittosporum glabrum</i>	hō‘awa
<i>Planchonella sandwicensis</i>	‘āla‘a
<i>Plantago pachyphylla</i>	laukahi kuahiwi
<i>Polyscias oahuensis</i>	‘ōhe mauka
<i>Polyscias sandwicensis</i>	‘ōhe mauka
<i>Pritchardia martii</i>	loulu
<i>Psychotria fauriei</i>	kōpiko
<i>Psychotria hathewayi</i>	kōpiko
<i>Psychotria mariniana</i>	kōpiko
<i>Psychotria</i> spp.	kōpiko
<i>Rhynchospora sclerioides</i>	kuolohia
<i>Sadleria cyatheoides</i>	‘ama‘u
<i>Sadleria pallida</i>	‘ama‘u
<i>Scaevola gaudichaudiana</i>	mountain naupaka, naupaka kuahiwi
<i>Scaevola mollis</i>	naupaka kuahiwi
<i>Selaginella arbuscula</i>	lepelepeamo
<i>Smilax melastomifolia</i>	hoi kauhiwi
<i>Syzygium sandwicense</i>	‘ōhia ‘ai
<i>Touchardia latifolia</i>	olonā
<i>Trematolobelia macrostachys</i>	koli‘i
<i>Vaccinium reticulatum</i>	‘ōhelo
<i>Viola kauaensis</i> var. <i>kauaensis</i>	No common name
<i>Wikstroemia oahuensis</i> var. <i>oahuensis</i>	‘ākia
<b>Invertebrates</b>	
<i>Anax strenuous</i>	giant Hawaiian Dragonfly
<i>Drosophila arcuata</i>	No common name
<i>Drosophila craddockae</i>	No common name

<b>Table H-7: Poamoho Native Species</b>	
<b>Scientific Name</b>	<b>Common, Local</b>
<i>Drosophila deltaneuron</i>	No common name
<i>Drosophila oahuensis</i>	No common name
<i>Drosophila turbata</i>	No common name
<i>Leptogryllus</i> spp.	No common name
<i>Philonesia</i> spp.	Helicarionid land snail
<i>Prognathogryllus</i> spp.	No common name
<i>Sierola leiocephala</i>	No common name
<i>Succinea</i> spp.	Succineid land snail
<i>Tornatellides / Tornatellina</i> spp.	Achatinellid land snail
<b>Fish</b>	
<i>Kuhlia sandwichensis</i>	āholehole

Source: USAG-HI, 2010b; DLNR, 2015a; Kawelo, 2022b; Kawelo, 2022e

**Table H-8: Protected Species Documented on State-Owned Land at Poamoho**

**Plants**

***Cyanea calycina* (haha):** This federally endangered species is a short-lived perennial shrub of the *Campanulaceae* (bellflower) family. It grows 4 to 11 feet tall with an 8-foot spread and has elliptic to oblanceolate leaves. It prefers stream banks, ridge crests, and gulch slopes in wet *Metrosideros-Dicranopteris* forest and shrublands between 1,830 and 3,000 feet in elevation in the Ko‘olau Mountains. There are 22 known locations in this mountain range. While it has a statewide population estimate of 362 individuals, less than 110 are in this mountain range (USFWS, 2019b). There has been a single *C. calycina* individual documented on the Poamoho Tract, which is 0.3 percent of the statewide population (USAG-HI, 2022c).

***Cyanea humboldtiana* (haha):** This federally and State-endangered species is an unbranched woody stem shrub of the *Campanulaceae* (bellflower) family. It grows 3 to 7 feet tall and has inversely broadly elliptic leaves that are 7 to 18 inches long and 3 to 6 inches wide. It prefers stream wet *Metrosideros-Dicranopteris* shrublands between 1,800 and 3,150 feet in elevation in the Ko‘olau Mountains. There are currently 40 known individuals in 12 subpopulations in the Ko‘olau Mountains (USFWS, 2019c). There has been a single *C. humboldtiana* individual documented on the Proposed NAR Tract, which is 2.5 percent of the statewide population (USAG-HI, 2022c).

***Cyanea koolauensis* (haha):** This federally and State-endangered species is an unbranched shrub of the *Campanulaceae* (bellflower) family. It grows 3 to 5 feet tall with leaves that have shallow, ascending, rounded teeth. It prefers slopes, ridge crests, and gulch bottoms in wet montane *Metrosideros-Dicranopteris* forest with other native plants between 535 and 3,146 feet in elevation. There is an estimated statewide population of 240 individuals, with less than 110 in this mountain range (USFWS, 2019d). There have been 3 *C. koolauensis* individuals documented on the Poamoho Tract, which is 1.3 percent of the statewide population, and 11 individuals documented on the Proposed NAR Tract, which is 4.6 percent of the statewide population (USAG-HI, 2022c).

***Cyanea lanceolata* (haha):** This federally and State-endangered species is a short-lived perennial unbranched shrub of the *Campanulaceae* (bellflower) family. It grows 3 to 10 feet tall with oblanceolate or elliptic leaves that are 6 to 24 inches long and 2 to 6 inches wide. It prefers mesic valleys and wet forests between 980 and 3,000 feet in elevation. There are 43 individuals known from 11 populations statewide (USFWS, 2019e). There has been a single *C. lanceolata* individual documented on the Poamoho Tract, which is 2.3 percent of the statewide population, and two individuals on the Proposed NAR Tract, which is 4.7 percent of the statewide population (USAG-HI, 2022c).

***Cyclosorus boydiae*:** This federally endangered species is a short-lived perennial fern of the *Thelypteridaceae* (delicate fern) family. It has erect or reclining stems and a tangled root mass that acts as a holdfast with fronds that are 4 to 12 inches long. It prefers rocky, exposed moss-covered rocks and streams in wet *Metrosideros* forest with other native grasses and ferns generally at lower elevations. There are 670 known individuals statewide (USFWS, 2021b). There have been three *C. boydiae* individuals documented on the Poamoho Tract, which is 0.4 percent of the statewide population (USAG-HI, 2022c).

***Euphorbia rockii* (‘akoko):** This federally endangered species is a short-lived perennial compact shrub or small tree of the *Euphorbiaceae* (spurge) family. It grows 2 to 13 feet tall with leathery oblong leaves that are 3 to 6 inches long and 1 inch wide. It is found in *Metrosideros-Dicranopteris* forest and shrubland between 2,100 and 3,000 feet in elevation. There are less than 100 individuals known from 10 populations statewide, all located in in the Ko‘olau Mountains (USFWS, 2019f). There has been a single *E. rockii* individual documented on the Proposed NAR Tract, which is 1 percent of the statewide population (USAG-HI, 2022c).

***Gardenia mannii* (nanu):** This federally and State-endangered species is a short-lived perennial tree of the *Rubiaceae* (coffee) family. It grows 16 to 50 feet tall with inversely lance-shaped leaves. This species prefers stream banks, ridge crests, gulch slopes and bottoms, and leeward drainages in wet to lowland mesic habitats between 700 and 2,300 feet in elevation. The statewide population estimate is 151 individuals (USFWS, 2019g). There have been 7 *G. mannii* individuals documented on the Poamoho Tract, which is 4.6 percent of the statewide population, and 10 individuals documented on the Proposed NAR Tract, which is 6.6 percent of the statewide population (USAG-HI, 2022c).

**Table H-8: Protected Species Documented on State-Owned Land at Poamoho**

***Hesperomannia swezeyi***: This federally endangered species is a long-lived perennial tree of the *Asteraceae* (sunflower) family. It grows 5 to 16 feet tall with leaves that are lance or egg shaped. This species generally grows in tight colonies and is most commonly found in wet forests and shrublands between 361 and 3,762 feet in elevation. The Ko‘olou population is morphologically different from the Wai‘anae population. The statewide population estimate is 458 individuals (USFWS, 2013). There have been eight *H. swezeyi* individuals documented on the Poamoho Tract, which is 1.7 percent of the statewide population, and seven individuals documented on the Proposed NAR Tract, which is 1.5 percent of the statewide population (USAG-HI, 2022c).

***Joinvillea ascendens* subsp. *ascendens* (‘ohe)**: This federally endangered and State-candidate species is a short-lived perennial herb of the *Joinvilleaceae* family. It grows 5 to 16 feet tall with leaf blades 18 to 32 inches long that are narrow and elliptic. This species prefers wet to mesic *Metrosideros polymorpha*-*Acacia koa* montane and lowland forests, as well as intermittent streams, and is generally found with other native species between 1,000 and 4,260 feet in elevation. The statewide population estimate is 100 individuals from 53 occurrences (USFWS, 2021c). There has been a single *J. ascendens* subsp. *ascendens* individual documented on the Poamoho Tract, which is 1.0 percent of the statewide population (USAG-HI, 2022c).

***Melicope hiiakae* (‘alani)**: This federally endangered and State-candidate species is a small tree of the *Rutaceae* (Rue) family. It grows 7 to 23 feet tall with glossy, leathery, thin, elliptic leaves. This species prefers lowland wet *Metrosideros-Dicranopteris* forest between 1,200 and 3,100 feet in elevation. The statewide population estimate is 50 individuals in three locations (USFWS, 2019h). There have been two *M. hiiakae* individuals documented on the Proposed NAR Tract, which is 4 percent of the statewide population (USAG-HI, 2022c).

***Melicope lydgatei* (‘alani)**: This federally and State-endangered species is a long-lived perennial small shrub of the *Rutaceae* (Rue) family. This species’ leaves are arranged oppositely or in threes that are glossy and papery and are 2 to 5 inches long and 1 to 3 inches wide. It prefers open ridges in mesic forests between 1,350 and 1,800 feet in elevation. The statewide population estimate is 12 individuals (USFWS, 2019i). There has been a single *M. lydgatei* individual documented on the Poamoho Tract, which is 8.3 percent of the statewide population, and three individuals documented on the Proposed NAR Tract, which is 25 percent of the statewide population (USAG-HI, 2022c).

***Myrsine juddii* (kolea)**: This federally and State-endangered species is a short-lived, many branched perennial shrub of the *Primulaceae* (primrose) family. It is 4 to 7 feet tall with 2- to 5-inch-wide leathery leaves that are approximately 1 inch long and inverse lance-shaped. This species prefers wet forests dominated by *Metrosideros* between 1,900 and 2,820 feet in elevation. The statewide population estimate is 548 individuals (USFWS, 2019j). There has been a single *M. juddii* individual documented on the Poamoho Tract, which is 0.2 percent of the statewide population, and five individuals documented on the Proposed NAR Tract, which is 0.9 percent of the statewide population (USAG-HI, 2022c).

***Phyllostegia hirsuta***: This federally endangered species is a short-lived perennial erect sub-shrub or vine of the *Lamiaceae* (mint) family. It has ovate-shaped leaves 6 to 12 inches long and 3 to 7 inches wide. This species prefers steep, shaded cliffs, slopes, gullies, ridges, and stream banks in wet or mesic forests dominated by *M. polymorpha* between 640 and 3,943 feet in elevation. The statewide population estimate is 131 individuals (USFWS, 2019k). There has been a single *P. hirsuta* individual documented on the Proposed NAR Tract, which is 0.8 percent of the statewide population (USAG-HI, 2022c).

***Platydesma cornutava* var. *decurrens***: This federally endangered species is a short-lived perennial shrub of the *Rutaceae* (Rue) family. It grows 3 to 23 feet tall and has sparse branches with clustered leaves that radiate from the ends. This species prefers a dry cliff and lowland mesic ecosystem between 1,850 and 3,040 feet in elevation. The statewide population estimate is 103 individuals (USFWS, 2019l). There has been a single *P. cornutava* var. *decurrens* individual documented on the Proposed NAR Tract, which is 1.0 percent of the statewide population (USAG-HI, 2022c).

**Table H-8: Protected Species Documented on State-Owned Land at Poamoho**

***Polyscias gymnocarpa* ('ohe 'ohe):** This federally endangered species is a long-lived perennial tree of the *Araliaceae* (ginseng) family. It grows 8 to 33 feet tall with leaves that are odd-pinnately compound with leathery leaflets. It prefers lowland wet, lowland mesic, and wet cliff ecosystems under 3,330 feet in elevation with a range from 50 to greater than 75 inches of annual rainfall. The statewide population is estimated to be 63 individuals over 11 populations (USFWS, 2019a). There were two *P. gymnocarpa* individuals documented the Proposed NAR Tract, which is 3.2 percent of the statewide population (USAG-HI, 2022c).

***Pteris lidgatei*:** This federally and State-endangered species is a short-lived perennial terrestrial course herb/fern of the *Adiantaceae* family. It has a 0.6-inch-thick rhizome that grows horizontally to about 4 inches when mature with fronds that are 24 to 27 inches long and 8 to 18 inches wide. This species prefers a lowland wet forest mesic ecosystem between 1,750 and 3,000 feet in elevation. The statewide population estimate is 28 individuals (USFWS, 2021d). There has been a single *P. lidgatei* individual documented on the Proposed NAR Tract, which is 3.6 percent of the statewide population (USAG-HI, 2022c).

***Sanicula purpurea*:** This federally and State-endangered species is a stout perennial herb of the *Apiaceae* (parsley) family. It grows from a massive stem that is 3 to 14 inches tall with fronds that are 1 to 3 inches with kidney- or egg-heart-shaped leaves. This species prefers open *Metrosideros* mixed montane bogs, and occasionally *Metrosideros* mixed montane wet shrublands between 2,300 and 5,570 feet in elevation. The statewide population estimate is 26 individuals (USFWS, 2018a). There has been a single *S. purpurea* individual documented on the Proposed NAR Tract which is 3.8 percent of the statewide population (USAG-HI, 2022c).

***Viola oahuensis*:** This federally and State-endangered species is an erect woody shrub of the *Violaceae* (violet) family. It grows 2 to 16 inches tall with elliptic- to ovate-shaped leaves that are papery in texture and cluster at the end of each stem. It prefers to be on or near exposed, windswept summit ridges of moderate to steep slopes in wet *Metrosideros-Dicranopteris* shrublands between 2,300 and 2,800 feet in elevation. The statewide population estimate is 584 individuals (USFWS, 2019m). There were two *V. oahuensis* individuals documented in the Proposed NAR Tract, which is 0.3 percent of the statewide population (USAG-HI, 2022c).

***Zanthoxylum oahuense* (a'e):** This federally endangered and State-candidate species is a small tree of the *Rutaceae* (Rue) family. It grows 10 to 20 feet tall with leaflets that are usually lateral pairs that are asymmetrically triangular, leathery, and in sets of three. This species prefers steep slopes and ridges in wet forest between 2,060 and 2,720 feet in elevation. The statewide population estimate is at least 50 individuals (USFWS, 2019n). There have been three *Z. oahuense* individuals documented on the Proposed NAR Tract, which is 6 percent of the statewide population (USAG-HI, 2022c).

**Table H-8: Protected Species Documented on State-Owned Land at Poamoho**

**Invertebrates**

***Achatinella* species (O’ahu tree snails):** Little is known about this genus, which is in steep decline, most likely from habitat destruction and introduced predators, including carnivorous snails and rats. An archival survey of *Achatinella* snail species completed in 1983 found that 11 snail species: *A. apexfulva*, *A. bulimoides*, *A. byronii*, *A. curta*, *A. decora*, *A. dimorpha*, *A. juncea*, *A. leucorrhaphe*, *A. livida*, *A. pulcherrima*, *A. rosea*, *A. sowerbyana*, *A. swiftii*, and *A. valida* were historically present at Poamoho since the 1930s. Most of the documented occurrences were prior to World War II, although some surveys completed in the 1950s and 1960s were conducted along the Poamoho trail (Christensen, 1983). Documented species instances appear to be along the north and south boundaries of Poamoho, with a few scattered internally and presumed snail habitat is throughout Poamoho (Christensen, 1983). The Army, in collaboration with agencies including the Division of Forestry and Wildlife, has conducted extensive and ongoing surveys of endangered snail species at Poamoho. Survey efforts are comprehensive and not limited to a single event across the area, with data collection being a continuous, coordinated effort. All relevant data regarding endangered snail species is documented and shared between involved agencies. To safeguard these species, these data are not publicly available (Kawelo, 2024).

The *Achatinella* 5-Year Status Review estimates a potential population of 243 *A. byronii/decipiens*, 5 *A. sowerbyana*, and an unknown number of *A. apexfulva* (USFWS, 2019o). There have been 2 *A. byronii/decipiens* individuals documented on the Poamoho Tract, which is less than 1 percent of the statewide population, and 1 *A. apexfulva* individual documented on the Poamoho Tract, for which no statewide population estimate is available; all individuals were documented up near the Poamoho trail to the north. There have been 8 *A. byronii/decipiens* individuals documented on the Proposed NAR Tract, which is 3.3 percent of the statewide population, and 2 *A. sowerbyana* individuals documented on the Proposed NAR Tract, which is 40 percent of the statewide population (USAG-HI, 2022c).

***Megalagrion nigrohamatum nigrolineatum* (blackline Hawaiian damselfly):** There is little is known about the population trends or abundance of the blackline Hawaiian damselfly; however, this species is found in the lowland wet ecosystems of the Ko’olau Mountains. Critical habitat has been identified for the blackline Hawaiian damselfly along the eastern border of Poamoho, just outside of the State-owned land area. The most recent statewide population estimate, in 2012, ranged between 800 and 1,000 individuals; no other population estimates are available (USFWS, 2019p). There have been at least 10 documented individuals of the blackline Hawaiian damselfly up near the Poamoho trail to the north by ANRPO staff (Kawelo, 2023a). The percentage that these documented individuals represent among the statewide population is unknown.

**Birds**

***Drepanis coccinea* (scarlet honeycreeper, i’i’wi).** While this species generally prefers elevations higher than 4,100 feet, O’ahu populations occur at lower elevations. The scarlet honeycreeper is known to fly long distances in search of flowering *M. polymorpha*, which also provides nesting habitat; it has been observed frequenting *Hibiscus arnottianus* subsp. *arnottianus* (white hibiscus, koki’o ke’oke’o) during peak flowering times (Kawelo, 2022d). The population estimate for the scarlet honeycreeper statewide is approximately 605,420 individuals with 90 percent of that population residing on Hawai’i Island. There is no population estimate for O’ahu, although it is considered a small remnant population, with most sightings occurring in the Wai’anae Mountains (PIFWO, 2016). There have been four scarlet honeycreeper individuals documented on the Poamoho Tract and three individuals on the Proposed NAR Tract, both of which are far less than 0.01 percent of the statewide population (USAG-HI, 2022c).



Table H-8: Protected Species Documented on State-Owned Land at Poamoho
<p><b><i>Pterodroma sandwichensis</i> (Hawaiian petrel).</b> The Hawaiian petrel is a seabird endemic to Hawai‘i. It nests in burrows, under vegetation, and in crevices and prefers to breed at between 480 and 3,600 feet in elevation in steep, wet montane forest dominated by <i>M. polymorpha</i> with <i>Dicranopteris linearis</i> understory and on steep dry cliffs. The population estimate for the Hawaiian petrel statewide is between 9,000 to 16,000; there is no population estimate for O‘ahu (USFWS, 2023a). There have been five Hawaiian petrel detections along the eastern edge of the Proposed NAR Tract; however, no burrows have been detected, and this species use of State-owned land has not been established. Assuming the five Hawaiian petrel detections represent five individuals, this represents far less than 0.01 percent of the statewide population (DLNR, 2022c).</p>
<p><b><i>Puffinus newelli</i> (Newell’s shearwater, ‘ua‘u).</b> The Newell’s shearwater is a seabird endemic to Hawai‘i. It nests in burrows, under vegetation, and in crevices and prefers to breed at between 480 and 3,600 feet in elevation in steep, wet montane forest dominated by <i>M. polymorpha</i> with <i>Dicranopteris linearis</i> understory and on steep dry cliffs. The at-sea population estimate for the Newell’s shearwater is 83,739 individuals. Approximately 90 percent of the population occurs on Kauai; there is no population estimate for O‘ahu (USFWS, 2017). There have been 170 Newell’s shearwater detections along the eastern edge of the Proposed NAR Tract; however, no burrows have been detected. Assuming the 170 Newell’s shearwater detections represent 170 individuals, this represents far less than 0.01 percent of the at-sea population estimate (DLNR, 2022c).</p>
Mammals
<p><b><i>Aeorestes semotus</i> (Hawaiian Hoary Bat, ‘ōpe‘ape‘a):</b> 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. There is potential roosting habitat for Hawaiian hoary bat at Poamoho; however, no roosts have been detected, and no passive acoustic detections have been documented (UH &amp; USGS, ND). While there are no population estimates for this species, according to the 2018 USFWS 5-Year Status Review for Hawaiian hoary bat, the species has been confirmed to be widely distributed and breeding on O‘ahu (USFWS 2021a).</p>

<b>Table H-9: Poamoho Invasive Plant Species</b>		
<b>Scientific Name</b>	<b>Common, Local</b>	<b>Key</b>
<i>Angiopteris evecta</i>	oriental vessel fern	1, 3
<i>Arthrostemum ciliatum</i>	No common name	1
<i>Andropogon virginicus</i>	broom sedge bluestem	2
<i>Ardisia elliptica</i>	shoebuttton	2
<i>Axonopus fissifolius</i>	common carpet grass	–
<i>Brachiaria mutica</i>	para grass	–
<i>Blechnum appendiculatum</i>	swamp fern	–
<i>Casuarina equisetifolia</i>	ironwood	1
<i>Casuarina glauca</i>	gray sheoak	1
<i>Cercropia obtusifolia</i>	trumpet tree	–
<i>Citharexylum caudatum</i>	juniper berry	–
<i>Clidemia hirta</i>	soap bush	2
<i>Cordyline fruticosa</i>	tiplant	–
<i>Cyathea cooperi</i>	Australian tree fern	1, 3
<i>Deparia petersenii</i>	Japanese false spleenwort	–
<i>Eucalyptus robusta</i>	swamp mahogany	–
<i>Falcataria moluccana</i>	Batai	1
<i>Hedychium coronarium</i>	white ginger	1
<i>Hedychium gardnerianum</i>	kāhili ginger	1, 3
<i>Heliocarpus popayanensis</i>	white moho	–
<i>Juncus planifolius</i>	broad leaf rush	–
<i>Leptospermum scoparium</i>	manukā	1
<i>Lantana camara</i>	lantana	–
<i>Oplismenus hirtellus</i>	bristle basket grass	–
<i>Paspalum conjugatum</i>	hilo grass	–
<i>Passiflora suberosa</i>	corky stem passion flower	–
<i>Psidium cattleianum</i>	strawberry guava	3
<i>Psidium guajava</i>	guava	–
<i>Pterolepis glomerata</i>	false meadow beauty	–
<i>Rhynchospora caduca</i>	angle stem beak sedge	1
<i>Sacciolepis indica</i>	Glenwood grass	–
<i>Schefflera actinophylla</i>	octopus tree	1

<b>Table H-9: Poamoho Invasive Plant Species</b>		
<b>Scientific Name</b>	<b>Common, Local</b>	<b>Key</b>
<i>Schinus terebinthifolius</i>	Brazilian pepper tree	3
<i>Seteria palmifolia</i>	palm grass	1
<i>Syzygium cumini</i>	Java plum	–
<i>Syzygium jambos</i>	rose apple	–

1. Controlled and eradicated when found in protected plant species areas
2. State-listed noxious weeds list
3. Hawai‘i Invasive Species Council Invasive Species list
4. O‘ahu Invasive Species Committee list

Source: USAG-HI, 2010b; Kawelo 2022a; USDA 2003; HISC, 2022; USDA, 2012; OISC, 2022

<b>Table H-10: MMR Vegetation Classes</b>					
<b>Vegetation Class</b>	<b>Acres Occupied Within MMR</b>	<b>Acres Occupied Within Makai Tract<sup>1</sup></b>	<b>Acres Occupied Within North Ridge Tract<sup>1</sup></b>	<b>Acres Occupied Within Center Tract<sup>1</sup></b>	<b>Acres Occupied Within South Ridge Tract<sup>1</sup></b>
Non-native Forest	360.3	0.7	5.7	0.0	0.0
Non-native Grassland	1367.5	70.2	91.4	59.3	36.3
Non-native Shrubland	1592.8	81.2	136.1	141.5	62.2
Closed ‘Ōhi’a Forest	5.8	0.0	0.0	0.0	0.0
Developed, Low Intensity	98.1	27.2	0.6	15.2	2.2
Kiawe Forest and Shrubland	102.9	9.5	21.7	0.1	1.3
Mixed Native/Non-native Forest	661.4	1.5	56.2	0.0	0.0
Mixed Native/Non-native Shrubs and Grasses	108.7	12.6	33.9	0.0	0.0
Open ‘Ōhi’a Forest	13.8	0.0	0.0	0.0	0.0
Open Water	2.0	2.0	0.0	0.0	0.0
Uluhe Shrubland	6.0	0.0	0.0	0.0	0.0
Uncharacterized Shrubland	42.5	0.0	0.0	0.0	0.0
Very Sparse Vegetation to Unvegetated	28.0	21.2	0.9	0.0	0.4
<b>Totals<sup>2</sup></b>	<b>4389.5</b>	<b>226.1</b>	<b>346.5</b>	<b>216.0</b>	<b>102.5</b>

1. Calculations based on State-owned land + 100-foot buffer.
2. USGS GIS calculations differ from Army GIS calculations due to mapping differences.

Source: USGS, 2016

Table H-11: MMR Native Species	
Scientific Name	Common, Local
<b>Plants</b>	
<i>Abutilon incanum</i>	hoary abutilon, ma‘o
<i>Alyxia stellata</i>	maile
<i>Antidesma platyphyllum</i>	hame
<i>Artemisia australis</i>	‘āhinahina
<i>Asplenium nidus</i>	‘ekaha
<i>Bidens macrocarpa</i>	ko‘oko‘olau
<i>Bidens torta</i>	ko‘oko‘olau
<i>Bobea sandwicensis</i>	‘ahakea
<i>Carex meyenii</i>	kāluhāluhā
<i>Carex</i> spp.	No common Name
<i>Carex wahuensis</i>	No common Name
<i>Chrysodracon halapepe</i>	halapepe
<i>Cibotium chamissoi</i>	hāpu‘u
<i>Cocculus orbiculatus</i>	Queen coralbead
<i>Coprosma foliosa</i>	pilo
<i>Deparia prolifera</i>	No common Name
<i>Dianella sandwicensis</i>	‘uki‘uki
<i>Diospyros hillebrandii</i>	lama
<i>Diospyros sandwicensis</i>	lama
<i>Diplazium sandwichianum</i>	pohole
<i>Dodonaea viscosa</i>	‘a‘ali‘i
<i>Doodia kunthiana</i>	No common Name
<i>Doryopteris decora</i>	kumuniu
<i>Dryopteris sandwicensis</i>	No common Name
<i>Elaeocarpus bifidus</i>	kalia
<i>Erythrina sandwicensis</i>	wiliwili
<i>Eugenia reinwardtiana</i>	nōi
<i>Euphorbia celastroides</i>	‘akoko
<i>Freycinetia arborea</i>	‘ie‘ie
<i>Hibiscus arnottianus</i> subsp. <i>arnottianus</i>	koki‘o ke‘oke‘o
<i>Kadua centranthoides</i>	No common Name

<b>Table H-11: MMR Native Species</b>	
<b>Scientific Name</b>	<b>Common, Local</b>
<i>Metrosideros polymorpha</i>	‘ōhi‘a
<i>Microlepia strigosa</i>	palapalai
<i>Myoporum sandwicense</i>	bastard sandalwood, naio
<i>Myrsine lessertiana</i>	kōlea lau nui
<i>Nestegis sandwicensis</i>	olopua
<i>Osteomeles anthyllidifolia</i>	‘ulei
<i>Peperomia blanda</i>	‘ala‘ala wai nui
<i>Peperomia membranacea</i>	‘ala‘ala wai nui
<i>Peperomia tetraphylla</i>	‘ala‘ala wai nui
<i>Pipturus albidus</i>	māmaki
<i>Plectranthus parviflorus</i>	‘ala‘ala wai nui Waihine
<i>Plumbago zeylanica</i>	‘ilie‘e, hilie‘e
<i>Polyscias sandwicensis</i>	ohe makai
<i>Psychotria hathewayi</i>	kōpiko
<i>Psychotria mariniana</i>	kōpiko
<i>Psydrax odorata</i>	alaha‘e
<i>Rauvolfia sandwicensis</i>	hao
<i>Santalum ellipticum</i>	‘iliahialo‘e
<i>Sapindus oahuensis</i>	lonomea
<i>Schiedea</i> spp.	No common Name
<i>Sicyos pachycarpus</i>	kūpala
<i>Sicyos</i> spp.	No common Name
<i>Sida fallax</i>	‘ilima
<i>Solanum americanum</i>	glossy nightshade, pōpolo
<i>Waltheria indica</i>	‘uhaloa
<i>Wikstroemia oahuensis</i> var. <i>oahuensis</i>	‘ākia
<b>Invertebrates</b>	
<i>Amastra rubens</i>	Amastrid land snail
<i>Auriculella ambusta</i>	Achatinellid land snail
<i>Auriculella</i> spp. aff. <i>Castanea</i>	Achatinellid land snail
<i>Auriculella</i> spp. aff. <i>Perpusilla</i>	Achatinellid land snail
<i>Partulina dubia</i>	Achatinellid land snail

<b>Table H-11: MMR Native Species</b>	
<b>Scientific Name</b>	<b>Common, Local</b>
<i>Drosophila ambochila</i>	picture wing fly
<i>Drosophila crucigea</i>	picture wing fly
<i>Drosophila gradata</i>	picture wing fly
<i>Drosophila hexachaetae</i>	picture wing fly
<i>Drosophila inedita</i>	picture wing fly
<i>Drosophila montgomeryi</i>	picture wing fly
<i>Drosophila punalua</i>	picture wing fly
<i>Drosophila turbata</i>	picture wing fly
<i>Philodoria lysimachiella</i>	No common Name
<i>Rhyncogonus fordi</i>	No common Name
<i>Rhyncogonus fuscus</i>	No common Name
<i>Sierola balteata</i>	No common Name
<i>Sierola koloa</i>	No common Name
<i>Sierola kumumu</i>	No common Name
<i>Sierola tumidoventris</i>	No common Name

Source: USAG-HI, 2010a; DLNR, 2015a; Kawelo, 2022b; Kawelo, 2022e

**Table H-12: Protected Species Documented on State-Owned Land at MMR**

**Plants**

***Abutilon sandwicense* (green flower Indian mallow):** This federally and State-endangered species is a short-lived perennial shrub of the *Malvaceae* (mallow) family. It grows up to 10 feet tall with short glandular hairs and light green heart-shaped leaves that are 3 to 9 inches long. It prefers gulches or steep slopes in mesic lowland forest between 500 and 2,900 feet in elevation, and between 50 and 75 inches of annual rainfall. There are 727 individuals, including 200 reintroduced individuals, known from 4 managed population units estimated in statewide population for which ANRPO undertakes management and stabilization to fulfill 2003 and 2008 BO requirements (USFWS, 2019q). There have been three occurrences of *A. sandwicense* on the North Ridge Tract within the Kaluakauila MU, which is 0.4 percent of the statewide population (USAG-HI, 2022c; Kawelo, 2023b).

***Bonamia menziesii* (Hawai’i lady’s nightcap):** This federally and State-endangered species is a short-lived perennial woody vine of the *Convolvulaceae* (morning glory) family. Its twining branches grow up to 33 feet long, with leathery leaves that are 1 to 4 inches wide and up to 1.6 inches long. On O’ahu, this species prefers dry or mesic forest between 266 and 2,158 feet in elevation. It is estimated that the statewide population is approximately 100 individuals (USFWS, 2021e). There have been three *B. menziesii* individuals documented on the North Ridge Tract within the Kaluakauila MU, which is 3 percent of the statewide population.

***Dracaena forbesii* (Wai’anae Range halapepe):** This federally endangered species is a short-lived perennial tree of the *Asparagaceae* (asparagus) family. It grows 10 to 23 feet tall and has spirally clustered leaves at the end of the branch that are 9 to 15 inches long and up to 0.5 inch wide. It prefers *Dodonaea* shrubland, cliffs, and lowland dry and mesic *Diospyros-Metrosideros Acacia* forest between 800 and 2,920 feet in elevation within the Wai’anae Mountain range. It is estimated the statewide population is spread across 11 populations with less than 150 individuals total (USFWS, 2019r). There has been a single *D. forbesii* individual documented on the North Ridge Tract within the Kaluakauila MU, which is 0.7 percent of the statewide population (USAG-HI, 2022c).

***Euphorbia celastroides kaenana* (‘akoko):** This federally endangered species is a short-lived perennial shrub of the *Euphorbiaceae* (spurge) family. It grows up to 5 feet tall, has milky sap, and has leaves arranged in two opposite rows that drop during the dry season and are 1 to 2 inches long and up to 1 inch wide. It prefers coastal dry shrubland on windward talus (debris pile up to a characteristic angle of repose) slopes between 30 and 700 feet in elevation. It is estimated that the statewide population is spread across 9 populations with 1,649 individuals (USFWS, 2019s). There have been a 48 *E. celastroides kaenana* individuals documented on the North Ridge Tract within the Pua’akanoa MU, which is 2.9 percent of the statewide population, and 56 individuals documented on the South Ridge Tract within the Lower ‘Ōhikilolo MU, which is 3.4 percent of the statewide population (USAG-HI, 2022c).

***Euphorbia haelealeana* (Herbst’s sandmat, ‘akoko):** This federally and State-endangered species is a dioecious (male and female flowers on separate plants) tree of the *Euphorbiaceae* (spurge) family. It grows between 10 and 46 feet tall and has papery alternate leaves 4 to 6 inches long and 2 inches wide. It prefers dry to mesic forests between 512 and 1,922 feet in elevation with other native plants. The statewide population is estimated to be 167 individuals (USFWS, 2021f). There have been a 58 *E. haelealeana* individuals documented on the North Ridge Tract within the Kaluakauila MU, which is 34.7 percent of the statewide population (USAG-HI, 2022c).

***Hibiscus brackenridgei* subsp. *mokuleianus* (Mokuleia rosemallow, maohauhele):** This federally and State-endangered species is an erect or sprawling shrub or small tree of the *Malvaceae* (mallow) family. It grows up to 16 feet tall and has heart-shaped leaves 2 to 6 inches long and wide. It prefers lowland dry to mesic forest and shrubland between 394 and 787 feet in elevation. The statewide population is estimated to be 181 individuals over 5 populations (USFWS, 2021g). There have been 5 *H. brackenridgei* subsp. *mokuleianus* individuals documented on the North Ridge Tract (4 of which were within the Kaluakauila MU), which is 2.8 percent of the statewide population, and 17 individuals documented on the South Ridge Tract within the Lower ‘Ōhikilolo MU, which is 9.4 percent of the statewide population (USAG-HI, 2022c).



**Table H-12: Protected Species Documented on State-Owned Land at MMR**

***Melanthera tenuifolia* (slender-leaf nehe, nehe):** This federally endangered species is a short-lived perennial woody herb of the *Asteraceae* (sunflower) family. The stems are 10 feet or longer, with a root that runs along the lower surface, and oppositely arranged leaves. It prefers mesic to dry habitat on ridge tops, bluffs, or cliffs in open areas and protected pockets or lama dominated shrublands or forests between 361 and 3,208 feet in elevation. The statewide population is estimated to be 2,100 individuals over 5 populations (USFWS, 2019t). There has been a single *M. tenuifolia* individual documented on the North Ridge Tract, which is less than 0.01 percent of the statewide population, and 2 individuals documented on the South Ridge Tract within the Lower ‘Ōhikilolo MU, which is also less than 0.01 percent of the statewide population (USAG-HI, 2022c).

***Neraudia angulata* (angular fruit, ma‘oloa):** This federally and State-endangered species is an erect shrub and is a member of the *Urticaceae* (nettle) family. It grows up to 10 feet tall with thin elliptic/oval leaves that are 3 to 6 inches long and up to 2 inches wide. It is found on steep slopes, gulches, and cliff faces in open dry forest between 200 and 2,300 feet in elevation. The statewide population is estimated to be 85 individuals over 7 populations (USFWS, 2019u). There have been 11 *N. angulata* individuals documented on the North Ridge Tract within the Kaluakauila MU, which is 13 percent of the statewide population (USAG-HI, 2022c).

***Nototrichium humile* (kulu‘i):** This federally and State-endangered species is an upright trailing shrub with branched stems of the *Amaranthaceae* (amaranth) family. It grows up to 5 feet long and has oppositely arranged leaves that are 1 to 4 inches long and up to 2 inches wide. It is found on ledges, slopes, or gulches in mesic forest dominated by *Diospyros* species between 1,214 and 2,690 feet in elevation. The statewide population is estimated to be between 880 and 950 individuals across 10 populations (USFWS, 2020b). There have been 8 *N. humile* individuals documented on the North Ridge Tract (4 of which were within the Kaluakauila MU), which is less than 0.01 percent of the statewide population (USAG-HI, 2022c).

***Schiedea hookeri* (Sprawling schiedea):** This federally and State-endangered species is a sprawling or clumped perennial herb of the *Caryophyllaceae* (pink) family. The stems are 1 to 2 feet and curve upward or lie close to the ground to produce matted clumps. It has thin opposite leaves that are 1 to 3 inches long and up to 0.6 inch wide. It is found in diverse mesic or dry lowland forest, frequently with *M. polymorpha* and lama dominant habitat between 1,200 and 2,600 feet in elevation. The statewide population is estimated to be up to 500 individuals across 8 populations (USFWS, 2018b). There have been two *S. hookeri* individuals documented on the North Ridge Tract within the Kaluakauila MU, which is 0.4 percent of the statewide population (USAG-HI, 2022c).

***Schiedea kealiae* (ma‘oli‘oli):** This species is a federally and State-endangered short-lived perennial subshrub of the *Caryophyllaceae* (carnation) family. It has sprawling stems that ascend 0.7 to 1.6 feet and form loose clumps with lance- or elliptical-shaped opposite leaves with a prominent midrib. There are 250 individuals in a single population in the Wai‘anae mountains and small scattered populations of 1 to 10 plants in either direction of the main population (USFWS, 2019v). There has been one documented individual of *S. kealiae* on the North Ridge Tract within the Kaluakauila MU, which is 0.4 percent of the statewide population (USAG-HI, 2022c; Kawelo, 2023b).

***Spermolepis hawaiiensis* (Hawai‘i scaleseed):** This federally and State-endangered species is an annual herb of the *Apiaceae* (parsley) family. The stems are 2 to 8 inches long, and leaves are narrow and dissected growing on 1-inch-long stalks. On O‘ahu, this species typically grows in coastal dry cliff vegetation on steep to vertical cliffs or at the base of cliffs and ridges between 82 and 1,004 feet in elevation. The statewide population is estimated to be up to 8,095 individuals (USFWS, 2021h). There has been a single *S. hawaiiensis* individual documented on the North Ridge Tract, which is 0.01 percent of the statewide population, and two individuals documented on the South Ridge Tract (one within the Lower ‘Ōhikilolo MU), which is also 0.01 percent of the statewide population (USAG-HI, 2022c).

<b>Table H-12: Protected Species Documented on State-Owned Land at MMR</b>
<b>Invertebrates (Not on State-owned Land)</b>
<p><b><i>Achatinella mustlina</i> (O‘ahu tree snail):</b> Surveys conducted between 1982 and 1983 at MMR documented <i>A. mustelina</i> individuals along the northeastern, eastern, and southeastern boundaries along gulches and slopes (Christensen &amp; Hadfield, 1984). Seventeen <i>A. mustelina</i> individuals have been documented on MMR; no snails have been observed on State-owned land (USAG-HI, 2010b; USFWS, 2024c).</p>
<b>Mammals</b>
<p><b><i>Aeorestes semotus</i> (Hawaiian Hoary Bat, ‘ōpe‘ape‘a):</b> 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. There is potential roosting habitat for Hawaiian hoary bat at MMR. No Hawaiian hoary bat roosts have been observed or detected at MMR, but passive acoustic detection of the bat has occurred at seven MMR locations; none of the detections were over State-owned land (UH &amp; USGS, ND). ANRPO staff conduct spot surveys for bats roosting in trees that need to be pruned or removed at Army installations during the bat pupping season each year. During 2023, 20 bat surveys were conducted over 11 hours and 71 trees were screened (ANRPO, 2023). While there are no population estimates for this species, according to the 2018 USFWS 5-Year Status Review for Hawaiian hoary bat, the species has been confirmed to be widely distributed and breeding on O‘ahu (USFWS 2021a).</p>

Table H-13: MMR Invasive Plant Species		
Scientific Name	Common, Local	Key
<i>Acacia farnesiana</i>	sweet acacia	–
<i>Acacia mearnsii</i>	black wattle	1, 2, 4
<i>Achyranthes aspera</i>	devil’s horsewhip	1
<i>Araucaria columnaris</i>	Cook pine	1
<i>Axonopus compressus</i>	broad leaf carpet grass	1
<i>Bidens pilosa</i>	hairy beggar ticks	–
<i>Casuarina equisetifolia</i>	Australian pine	1
<i>Casuarina glauca</i>	ray she oak	1
<i>Cenchrus setaceus</i>	fountaingrass	1, 2, 4
<i>Cirsium vulgare</i>	bull thistle	1
<i>Clidemia hirta</i>	soap bush	2
<i>Desmodium intortum</i>	green leaf tick trefoil	1
<i>Ehrharta stipoides</i>	meadow rice grass	1
<i>Erigeron karvinskianus</i>	Latin American fleabane	–
<i>Fraxinus uhdei</i>	tropical ash	1
<i>Grevillea robusta</i>	silk oak	–
<i>Kalanchoe pinnata</i>	cathedral bells	–
<i>Lantana camara</i>	lantana	–
<i>Melinis minutiflora</i>	molasses grass	–
<i>Montanoa hibiscifolia</i>	tree daisy	2
<i>Myrica faya</i>	fire tree, faya tree	1, 2, 4
<i>Nephrolepis multiflora</i>	Asian sword fern	1
<i>Panicum maximum</i>	Guinea grass	–
<i>Paspalum conjugatum</i>	hilo grass	–
<i>Pluchea carolinensis</i>	sour bush, cure for al	–
<i>Prosopis pallida</i>	kiawe, algaroba, mesquite	3
<i>Psidium cattleianum</i>	strawberry guava	4
<i>Psidium guajava</i>	guava	–
<i>Roystonea regia</i>	royal palm, Cuban palm	1
<i>Rubus argutus</i>	sawtooth blackberry	1, 2, 4
<i>Schinus terebinthifolius</i>	Brazilian pepper tree	4
<i>Syzygium cumini</i>	Java plum	–

<b>Table H-13: MMR Invasive Plant Species</b>		
<b>Scientific Name</b>	<b>Common, Local</b>	<b>Key</b>
<i>Syzygium jambos</i>	rose apple	1
<i>Toona ciliata</i>	Australian red cedar	–
<i>Triumfetta semitriloba</i>	bur	2

1. Controlled and eradicated when found in protected plant species areas
2. State-listed noxious weed list
3. Federal noxious weed list
4. Hawai‘i Invasive Species Council Invasive species list

Source: USAG-HI, 2010b; Kawelo 2022a; USDA 2003; HISC, 2022; USDA, 2012; OISC, 2022

Appendix I

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# **Historic and Cultural Resources Literature Review**

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**FINAL—Historic and Cultural Resources Literature Review  
for Army Training Land Retention of State Lands in Makua Military Reservation,  
Kahuku Training Area, and Kawaihoa-Poamoho Training Area,  
Island of O‘ahu, Hawai‘i**

TMKS: (1) 5-8-002:002; (1) 5-9-006:026; (1) 6-9-003:001 (por.); (1) 7-2-001:006; (1) 8-1-001:007 (por.);  
(1) 8-1-001:008; (1) 8-1-001:012 (por.); (1) 8-2-001:002 (por.); and (1) 8-2-001:001, 022, 024, and 025

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Hawai‘i SHPD Permit No. 23-07  
Kleinfelder Project No: 20212626.001A

September 22, 2023

## MANAGEMENT SUMMARY

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At the request of Group 70 International, Inc., and on behalf of the U.S. Army Corps of Engineers, Honolulu District, Kleinfelder, Inc. conducted a literature review of previously recorded historic and cultural resources for the Army Training Land Retention of State Lands Project at Makua Military Reservation, Kahuku Training Area, and Kawaihoa-Poamoho Training Area, Island of O‘ahu, Hawai‘i, a proposed action under the National Environmental Protection Act. The Proposed Action does not involve new training, construction, or resource management activities at these installations. Instead, it is a real estate/administrative action that would enable continued military use of the State-owned lands.

The current study consists of background archival research, a records search at the State Historic Preservation Division Library in Kapolei, and a review of cultural resource study reports and geographic information system data on file with the U.S. Army Garrison-Hawaii to compile baseline conditions regarding historic and cultural resources within the State-owned lands. The results of this literature review and desktop analysis aim to support an EIS being prepared for the Proposed Action, which will analyze impacts on the historic and cultural resources identified in this document.



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## 1 INTRODUCTION

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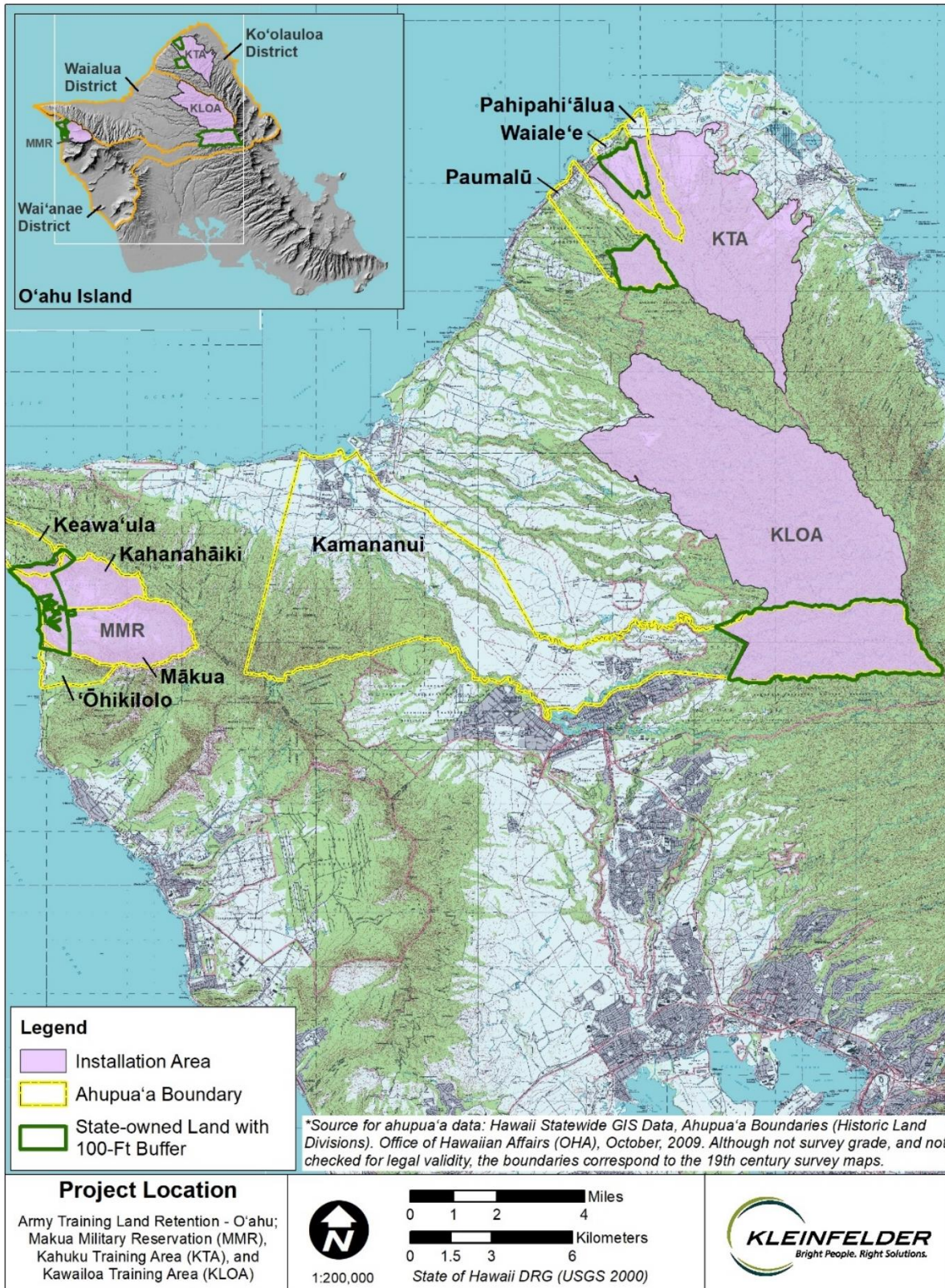
At the request of Group 70 International, Inc. (G70), and on behalf of the U.S. Army Corps of Engineers, Honolulu District (USACE), Kleinfelder, Inc. conducted a literature review of previously recorded historic and cultural resources for the U.S. Army Training Land Retention (ATLR) of State Lands project on the Island of O‘ahu, Hawai‘i, a proposed action under the National Environmental Protection Act. Several State-owned parcels currently leased by the U.S. Government, referred to in the EIS and throughout the current document as State-owned lands or the Region of Influence (ROI), are the subject of the current study (Figure 1). These parcels include portions of Makua Military Reservation (MMR) (Figure 2), Kahuku Training Area (KTA) (Figure 3), and Kawaihoa-Poamoho Training Area (Poamoho), situated within the southern portion of the larger Kawaihoa Training Area (KLOA) (Figure 4).

G70 is preparing an Environmental Impact Statement (EIS) for the ATLR of State Lands project, which does not involve new training, construction, or resource management activities at these installations. Instead, it is a real estate/administrative action that would enable continued military use of the State-owned lands. The EIS evaluates the potential impacts of a variety of 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 the term of the current lease in 2029).

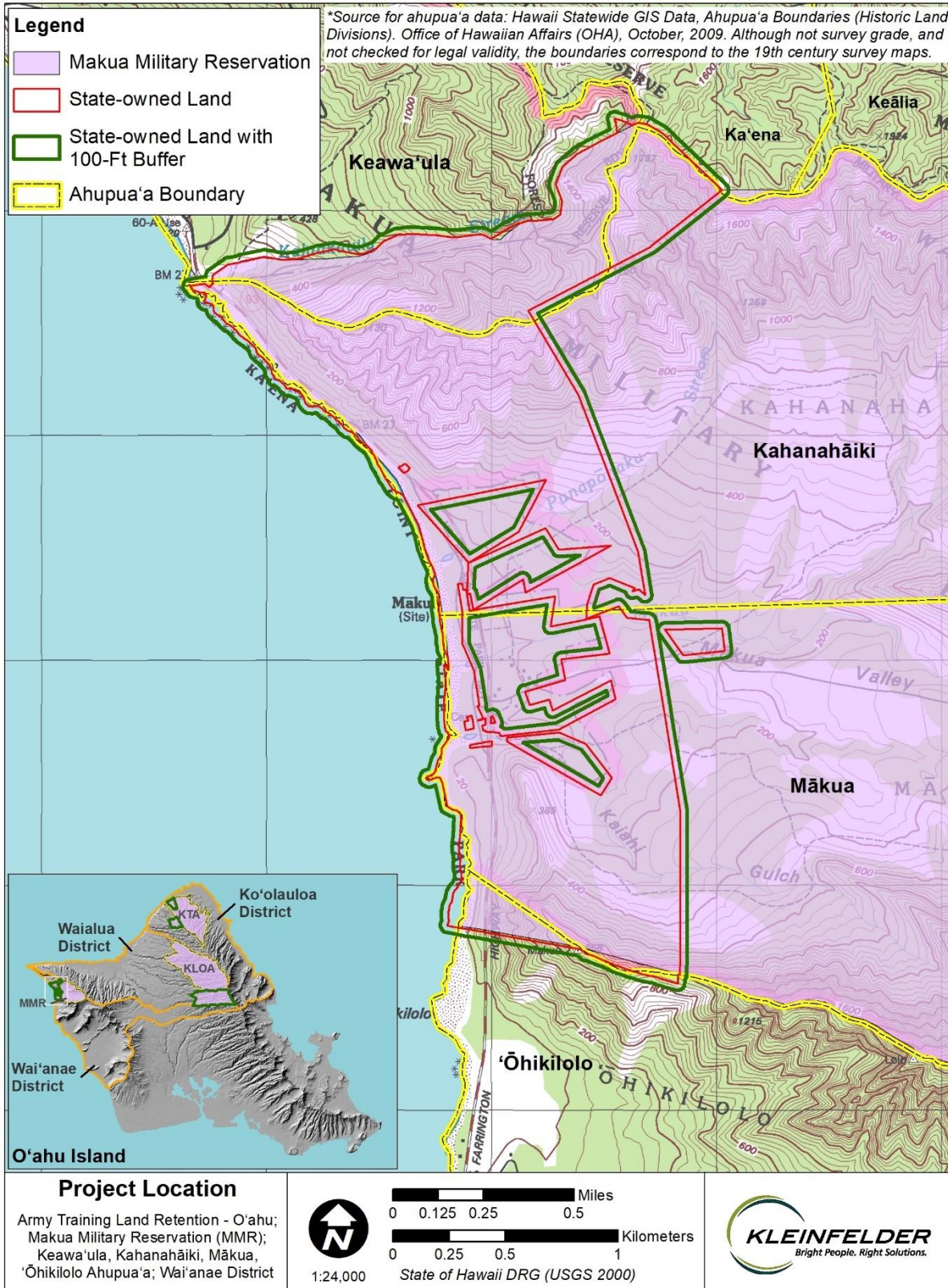
The current study consists of background archival research, a records search at the State Historic Preservation Division Library in Kapolei, and a review of cultural resource study reports and geographic information system data on file with the U.S. Army Garrison-Hawaii to compile baseline conditions regarding historic and cultural resources located within or partially within the State-owned lands. The discussion of previously conducted cultural resource studies in this report is not comprehensive since it is limited to reports provided and approved for use by the USAG-HI. GIS data on site locations and boundaries was also provided by USAG-HI. The results of this literature review and desktop analysis aim to support the EIS being prepared for the Proposed Action, which will analyze impacts on the historic and cultural resources identified in this document.

### 1.1 PROJECT OVERVIEW

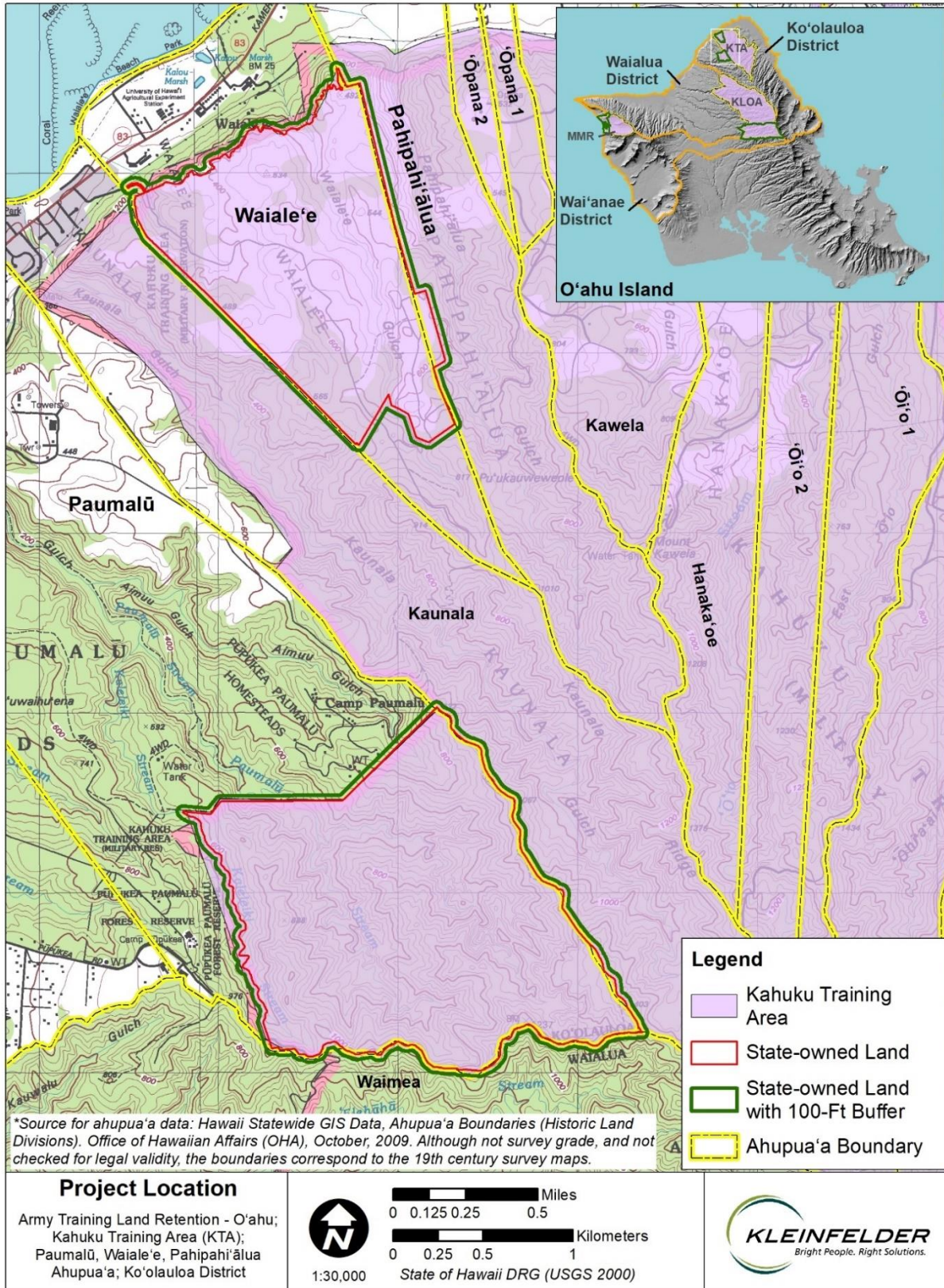
The ATLR of State-owned lands (a Proposed Action) proposes for the Army to retain up to approximately 6,322 acres of State-owned lands prior to the expiration of the current lease in 2029 to ensure training is not interrupted. The purpose of the Proposed Action is to enable the Army to continue to conduct ongoing activities (training and other activities, such as public use programs) on the State-owned lands within MMR, KTA, and Poamoho, including those activities needed to meet its current and future training and combat readiness requirements. The Army would continue to permit and coordinate training and other activities on the retained State-owned lands by outside users of these installations.



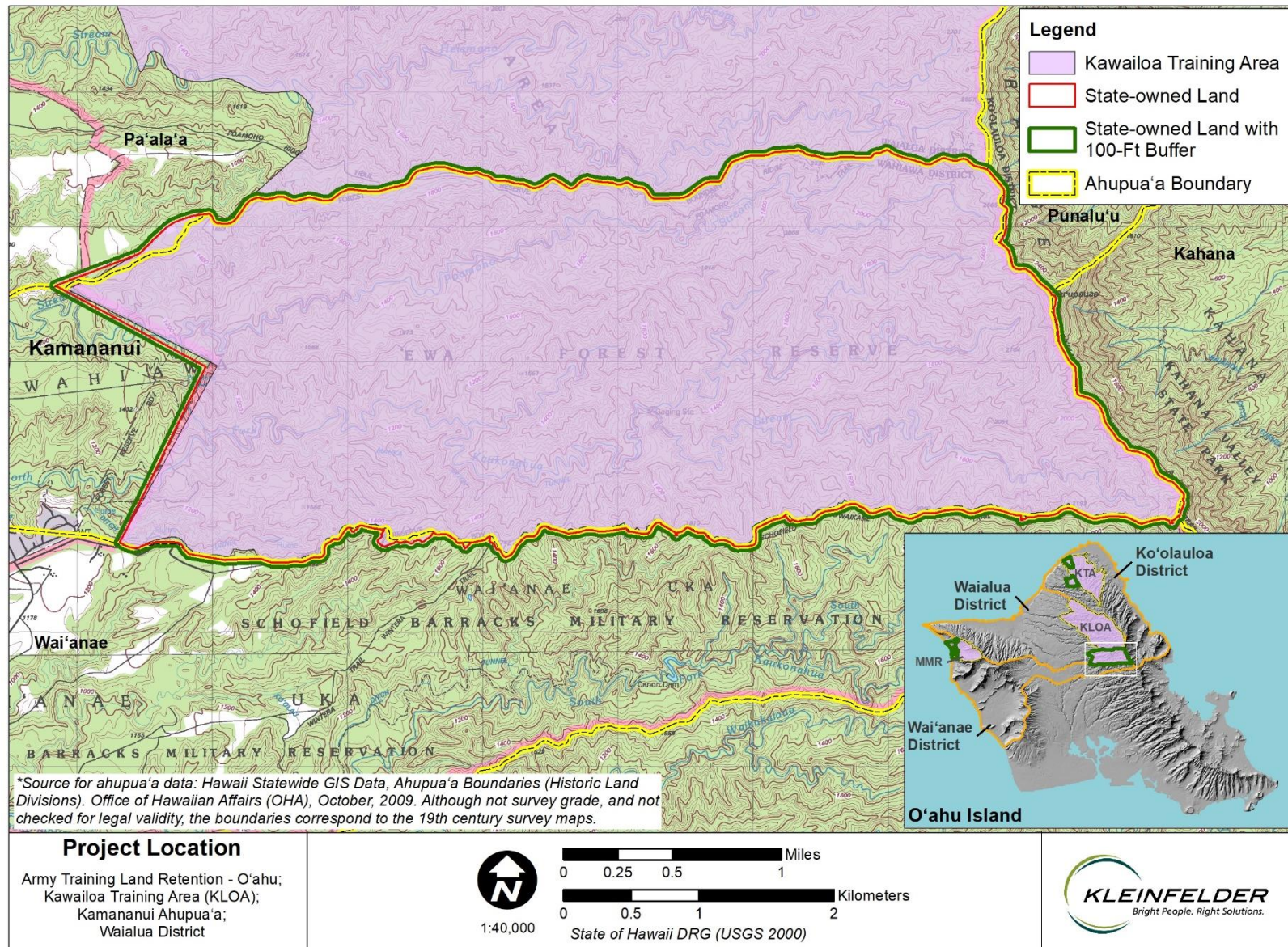
**Figure 1. Overview of ROI locations on 2000 USGS DRG quadrangle.**



**Figure 2. State-owned land and expanded 100-foot buffer for MMR depicted on 2000 USGS DRG quadrangle.**



**Figure 3. State-owned land and expanded 100-foot buffer for KTA depicted on 2000 USGS DRG quadrangle.**



**Figure 4. State-owned land and expanded 100-foot buffer for Poamoho depicted on 2000 USGS DRG quadrangle.**

## **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” (42 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 Army is initiating the 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 Hawaii EIS statute and implementing rule, codified in Hawaii Revised Statutes (HRS) Chapter 343 and Hawaii Administrative Rules (HAR) Chapter 11-200-1. Collectively, the Hawaii statute and rule are referred to as the “Hawaii 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 historic and cultural resources (see Section 1.4 below for definitions of historic and cultural resources) known to exist within the State-owned lands. 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) (Craft et al. 2023) prepared in accordance with the Hawaii 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 STUDY AREA DESCRIPTION**

The Study Area for historic and cultural resources consists of approximately 6,322 acres of State-owned lands within three Army installations that are currently leased by the U.S. Government. The Study Area encompasses eight complete and four partial Tax Map Key (TMK) parcels, as detailed for each installation below. The Study Area is alternatively referred to as the ROI, which represents the extent of the geographical area that could be impacted by the Proposed Action.

### **1.3.1 Makua Military Reservation (MMR)**

The ROI for MMR comprises approximately 982 acres, situated along the Wai’anae Coast of O’ahu in the western portion of MMR and within the Wai’anae District. The ROI for MMR is situated within four



ahupua'a: Keawa'ula, Kahanahāiki, Mākua, and 'Ōhikilolo; it encompasses five TMK parcels (TMKs [1] 8-1-001:008 and [1] 8-2-001:001, 022, 024, and 025) and portions of four parcels (TMKs [1] 6-9-003:001, [1] 8-1-001:007 and 012, and [1] 8-2-001:002) (Figure 5). The MMR parcels are also referred to as the Makai, North Ridge, Center, and South Ridge Tracts.

### **1.3.2 Kahuku Training Area (KTA)**

The ROI for KTA is located near the northern tip of O'ahu within the Ko'olauloa District and encompasses two discontinuous TMK parcels (TMK [1] 5-8-002:002 and [1] 5-9-006:026) totaling approximately 1,268 acres (Figure 6). The northern parcel (Tract A-1) is situated within the northern portion of KTA and is comprised of an approximately 496-acre parcel located in Waiale'e Ahupua'a, with a small portion extending east into Pahipahi'ālua Ahupua'a. The southern parcel (Tract A-3) is situated along the western KTA boundary and is comprised of an approximately 772-acre parcel located in Paumalū Ahupua'a.

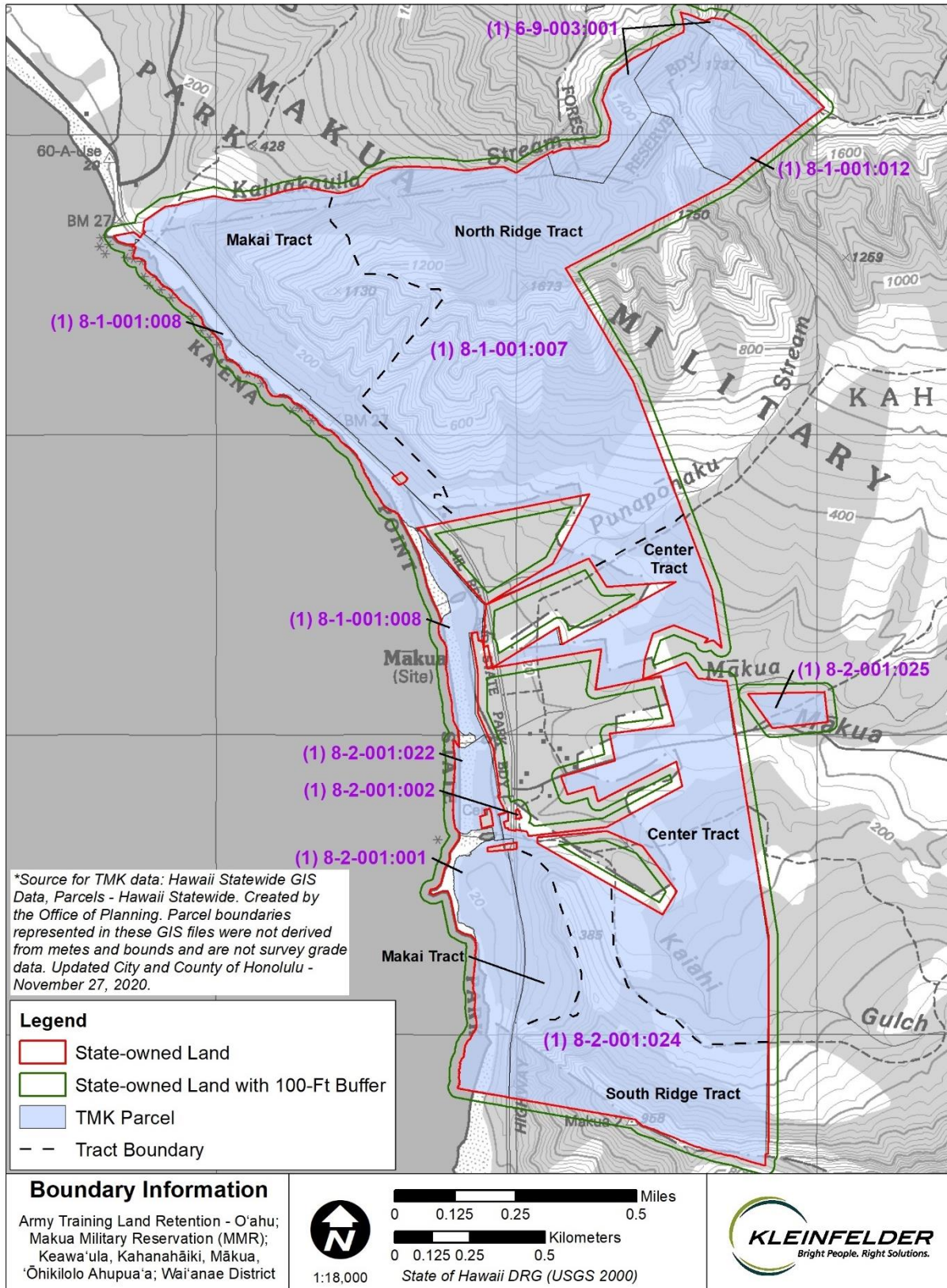
### **1.3.3 Kawailoa-Poamoho Training Area (Poamoho)**

The ROI for Kawailoa-Poamoho Training Area (Poamoho), located within the southern portion of the larger KLOA, comprises approximately 4,582 acres and is situated within the interior portion of O'ahu Island in the Waialua District; it encompasses one TMK parcel (TMK [1] 7-2-001:006) within Kamananui Ahupua'a (Figure 7). The ROI for Poamoho extends west from the summit of the Ko'olau Mountains to the eastern boundary of Wahiawā. The eastern portion of the ROI for Poamoho is also referred to as the Natural Area Reserve (NAR) Tract (established by Hawaii Board of Land and Natural Resources in 2005), while the remaining western portion is referred to as the Poamoho Tract.

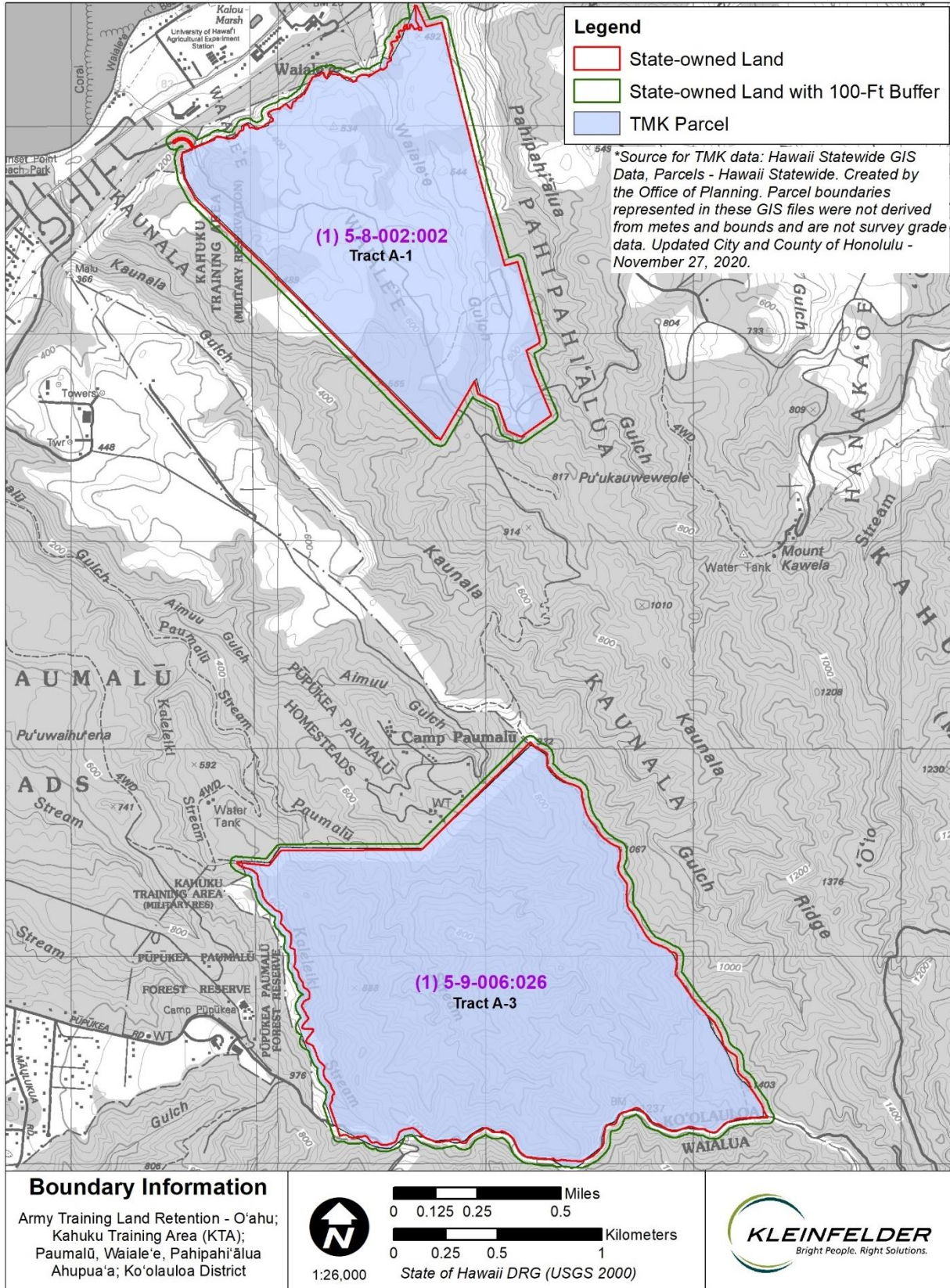
## **1.4 DEFINITION OF HISTORIC AND CULTURAL RESOURCES**

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)].

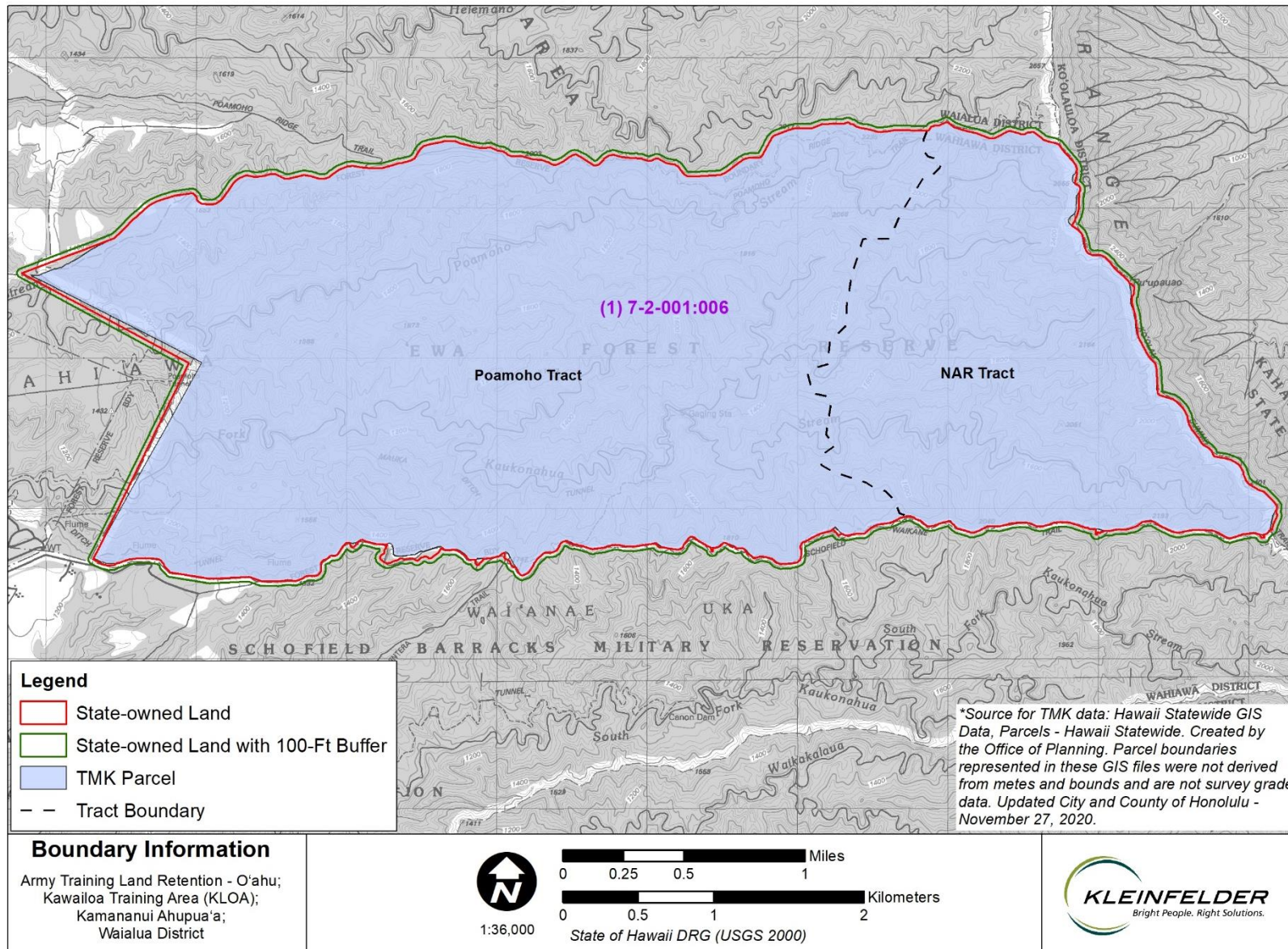
Most resources that are cultural or historical in nature are defined by several federal laws as historic properties under the NHPA (districts, sites, buildings, structures, or objects eligible for, or listed in the NRHP); as archaeological resources as defined by ARPA; or human remains (iwi kūpuna) and 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.



**Figure 5. TMK and Tract information within the State-owned land at MMR.**



**Figure 6. TMK and Tract information within the State-owned land at KTA.**



**Figure 7. TMK and Tract information within the State-owned land at Poamoho.**

## 2 BACKGROUND

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The following background information establishes the environmental and historical setting of the individual ROIs for MMR, KTA, and Poamoho. This information provides a contextual framework for assessing current conditions and conducting an environmental analysis for the project EIS.

### 2.1 MAKUA MILITARY RESERVATION (MMR)

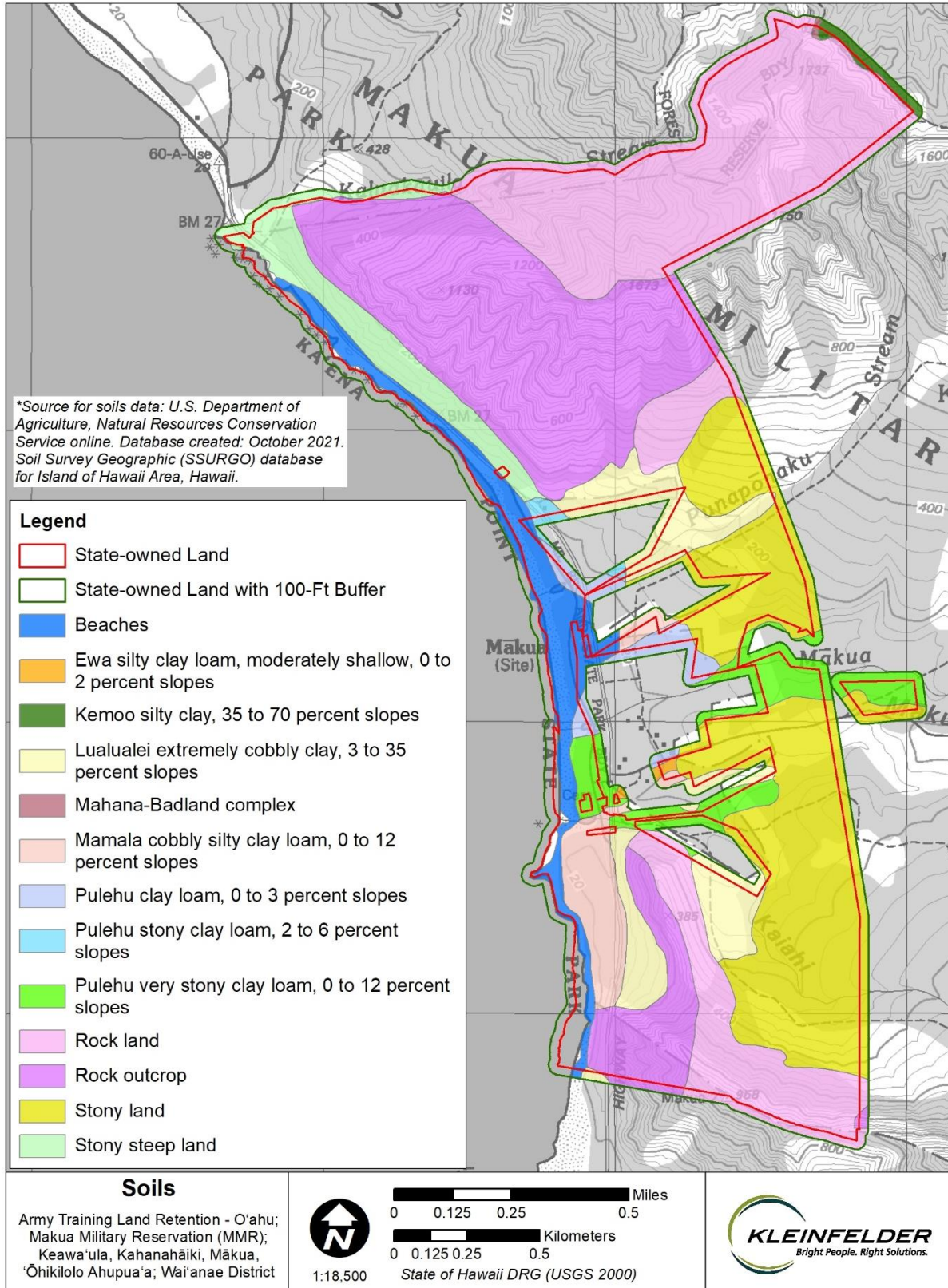
This section provides the environmental and historical background for the approximately 982-acre ROI for MMR within the Waiʻanae District.

#### 2.1.1 Environmental Context

The ROI for MMR is situated at the western edge of MMR along the western coast of Oʻahu and extends approximately 3.4 kilometers (2.1 miles) along the coastline and roughly one and a half kilometers (0.93 mile) inland into the lower Mākua and Kahanahāiki valleys (see Figure 2). The southern portion of the ROI for MMR is in Mākua Ahupuaʻa, with a small portion extending into Ōhikololo Ahupuaʻa while the northern portion is in Kahanahāiki Ahupuaʻa, with a small portion extending into Keawaʻula Ahupuaʻa. The ROI for MMR is situated within the Waiʻanae District along the rim of a volcanic caldera remnant which forms the western portion of Oʻahu. Elevations within the ROI for MMR range from sea level to approximately 522 meters (1,715 feet) above mean sea level (amsl), while annual rainfall averages around 883 millimeters (34.75 inches) (Giambelluca et al. 2013). Vegetation communities comprised of grasses, shrubs, and dispersed trees, such as kiawe (*Prosopis pallida*), koa haole (*Leucaena glauca*), and ʻilima (*Sida fallax*), are typical of the arid leeward rangelands of Oʻahu. Three intermittent streams flow from the mauka portions of MMR: Punapohāku Stream (on the north side of Kahanahāiki Valley), and Mākua and Kalena streams (in the northern and southern portions of Mākua Valley). Steep, rocky, and stony lands represent approximately 76 percent of the ROI for MMR. Soils mapped within the remaining portions of the ROI include Ewa silty clay loam, Kemoo silty clay, Lualualei extremely cobbly clay, Mamala cobbly silty clay loam, Pulehu stony/very stony clay loams, and Beaches (Figure 8). These soils are mainly present along the upper and lower elevations of the ROI, and in drainages.

#### 2.1.2 Traditional Land Use

Traditional Hawaiian populations in Mākua and Kahanahāiki Ahupuaʻa at the time of Western contact are estimated to have been around 300 to 400 (Kelly and Quintal 1977:33) or 420 individuals (Cordy 2002). Traditional communities along the Mākua coastal region were therefore sparse and were supported by dryland cultivation of ʻuala (*Ipomoea batatas*, sweet potato), as attested by ethnographic accounts (Handy and Handy 1991:275). ʻUala, kalo (*Colocasia esculenta*, taro), and pili grass (*Heteropogon contortus*) have all been documented as important resources in the wider Mākua Valley (Kelly and Quintal 1977:16,18); although, how much they were cultivated in the direct ROI for MMR is unknown.



**Figure 8. Soils mapped within the ROI for MMR.**

Marine resources along the shore west of MMR were rich with both pelagic and near-shore species, which would have been harvested along with shellfish and various species of limu (seaweed). Aquaculture, in the form of loko i'a (fishponds) that were used to trap and grow certain fish species as well as to cultivate limu, was also practiced along the coastal regions of Wai'anae, although not within the ROI itself.

While specific references to direct traditional use of the ROI for MMR are minimal, several traditional landmarks are known within the State-owned land. Mākua Beach, located in the central portion of the ROI for MMR, was recognized as a favorable canoe landing spot ('I'i 1983:98; Kelly and Quintal 1977:4). Kāneana Cave, now known as Mākua Cave (SIHP Site 50-80-03-0177), located in the southern portion of the ROI for MMR, is mentioned in several mo'olelo (McAllister, in Sterling and Summers 1978:81) and was certainly recognized as a significant feature by native inhabitants of the region.

Appendix B (Cultural Impact Assessment) of the EIS for ATR on O'ahu contains additional information on traditional land use at MMR (Craft et al. 2023).

### **2.1.3 Early Historic Period Accounts**

An early historical account of Mākua by Levi Chamberlain in the 1820s describes it as a small treeless coastal settlement planted with 'uala and kō (*Saccharum officinarum*, sugarcane):

Makua is situated on a sand beach and opens to the sea between two bold head lands S.E. and N.W. The mountains rise in a circular manner and on the North have a slope to the valley, on the east of the mountains are more precipitous, the summits of all the ridges which overlook this valley are very steep and broken. There are no trees in this place, a few clusters of sugar cane are seen here and there, potatoes are cultivated but not taro. [Chamberlain, in Sterling and Summers 1978:84]

From 1815 to 1826, sandalwood was intensely harvested from the Wai'anae Mountains (Kamakau 1992). Chamberlain also described the ruins of a hut observed in 1828 in the upper reaches of Mākua Valley, "built apparently not long since for the accommodation of sandal wood cutters" (Chamberlain 1957:37). Whether sandalwood harvesting was conducted within the specific boundaries of the State-owned land is not known.

Traditional communities along the Wai'anae Coast during the decades following Euro-American contact continued to be small. An 1826 sketch of Mākua by Hiram Bingham (Figure 9) depicts a small coastal community near the shore and a few scattered structures mauka or inland and upland from the shore. Green (1980:20–21) described Mākaha Valley, just a few miles to the south of the ROI for MMR, as "a hamlet in a small grove of coconut trees on the Kea'au side of the valley, some other scattered houses, a few coconut trees along the beach, and a brackish water pool that served as a fish pond, at the mouth of the Mākaha Stream."



**Figure 9. Bingham’s 1826 sketch of Mākua Valley, from Green (1980:9).**

References to professional robbers in Mākua, and the Wai‘anae Coast in general, are found in ethnographic accounts of traditional activities (Beckwith 1940; Fornander 1918; ‘I‘i 1983). These robbers, sometimes referred to as ‘Ōlohe or ha‘a, people trained in the art of wrestling and lua (bone breaking), were said to lay in wait along the cliffs above the coastal trails between Mākaha and Ka‘ena to rob and kill travelers.

#### **2.1.4 The Māhele ‘Āina and Land Tenure Change**

The 1848 Māhele ‘Āina eliminated the Traditional Hawaiian land tenure system in favor of the western concept of fee-simple land ownership; this would have far reaching consequences on Hawai‘i’s cultural landscape. All land in the Kingdom of Hawai‘i was placed into one of three categories: Crown Lands, Government Lands, or Konohiki Lands. During the Māhele, Hawaiian chiefs and konohiki (heads of land divisions) were required to present land claims to the governmental Land Commission in the hopes of receiving a Land Commission Award (LCA) title for the land quit-claimed to them by Kamehameha III. Until an award was issued, the land title remained with the government. Award of an LCA gave complete title to the subject lands, although the government still had a right to commutation. A commutation could be settled by a cash payment or by a land exchange of equal value. If successful, a Royal Patent was then issued by the minister of the interior. A Royal Patent quitclaimed the government’s interest in the land and served as proof that the government’s right to commutation no longer existed.

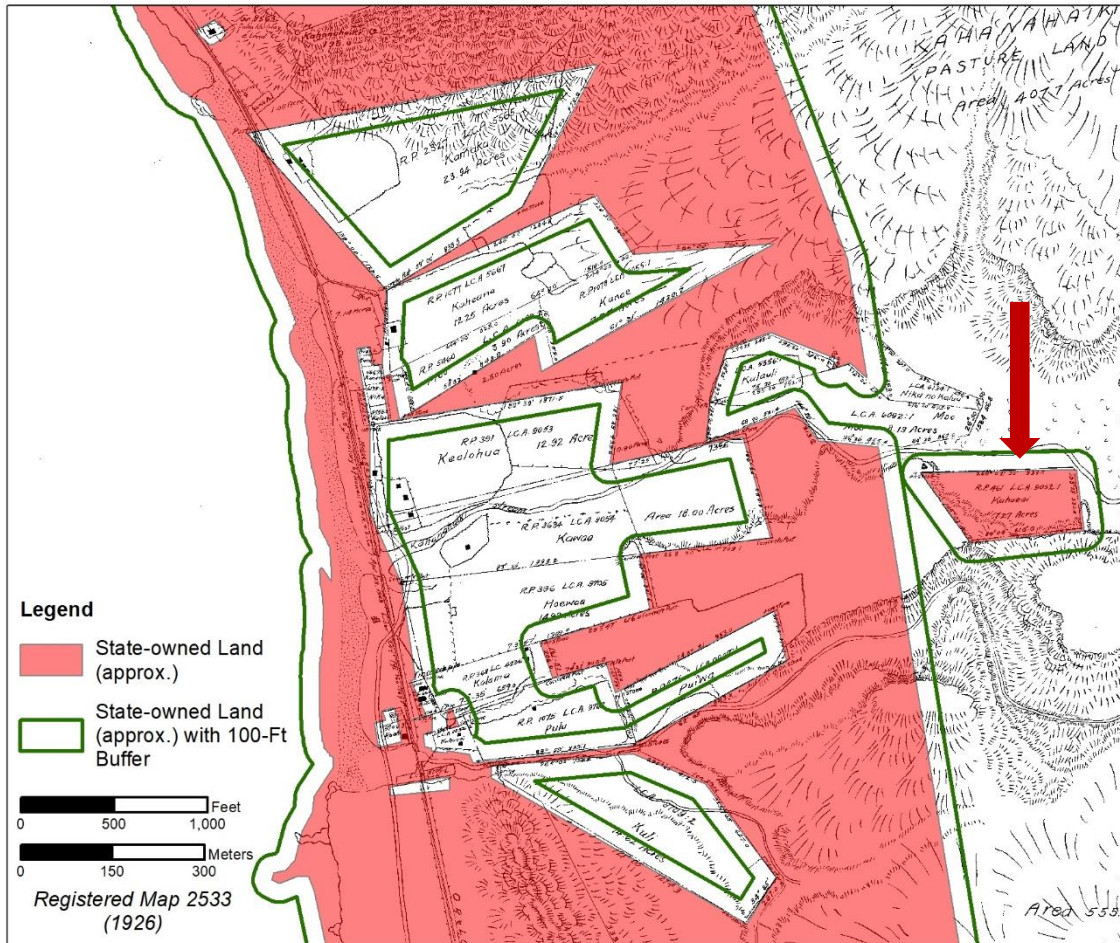


The “Second Great Māhele” or Kuleana Act of 1850 bolstered private land ownership even further by permitting maka‘āina, or commoners, to own land as well as foreign-born individuals. The Act’s restrictions, however, made it difficult to receive a land award, which discouraged Hawaiians who did not actively cultivate land. The Act of August 10, 1854 later dissolved the Land Commission but stated, “a Land Commission Award shall furnish as good and sufficient a ground upon which to maintain an action for trespass, ejectment, and other real action, against any person or persons, whatsoever, as if the claimant, his heirs or assigns, had received a Royal Patent for the same” (Chinen 1958:14). An LCA recipient was thus still protected if they had not obtained 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 acquisition of land by wealthy foreign investors.

#### **2.1.4.1 LCA and Kuleana Claims**

As a result of the 1848 Māhele, a total of 19 land claims were awarded in two of the four ahupua‘a within the ROI for MMR: 10 in Mākua comprising 111 acres and 9 in Kahanahāiki comprising 70 acres (Kelly and Quintal 1977:32). Only one LCA (LCA 9052:1) is situated within the ROI, which was awarded to Kahueai in 1851 as Grant 461. LCA 9052:1 mentions the word “kula”, likely a reference to cultivated land, while LCA 9052:2, located outside the ROI, is described as an “enclosed house lot”. Several other land claims awarded in the vicinity of the ROI also contained multiple, discontinuous ‘āpana (land parcels). The sizes and distribution of these indicate the smaller ‘āpana were used primarily for habitation, while the larger upland ‘āpana were used for farming or ranching (Figure 10). This is evident in the description of LCA 9055, associated with two ‘āpana bounded by the ROI, which mentions a house within the smaller coastal parcel (9055:2) and ranching type structures (rock walls and an enclosure) on the upland ‘āpana (9055:5).



**Figure 10. Portion of Hawai'i Registered Map 2533 (Wall 1926) depicting LCA 9052:1 (indicated by red arrow) in Mākua and Kahanahāiki valleys in 1912.**

### 2.1.5 Historic Period Land Use

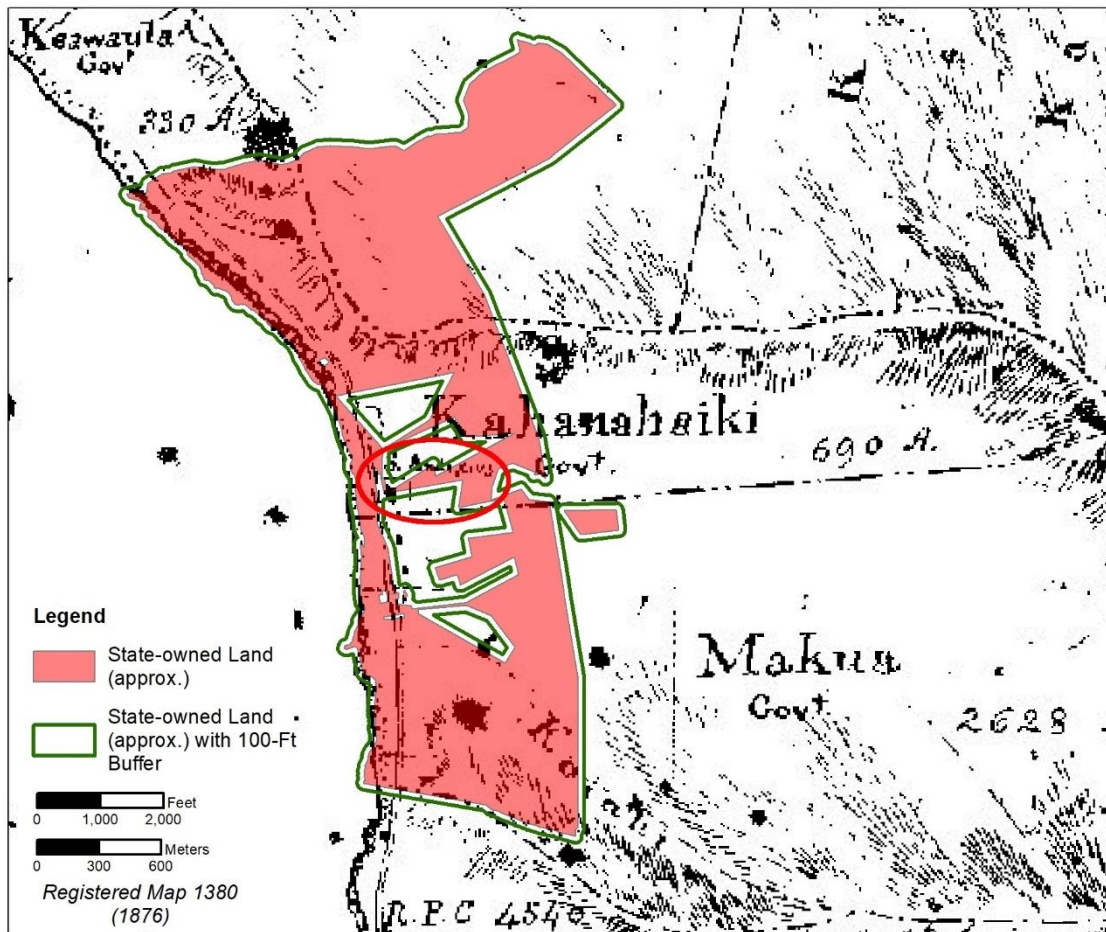
Historic Period land use within the ROI for MMR included ranching, agriculture, and U.S. military use, as described below.

#### 2.1.5.1 Ranching and Agriculture

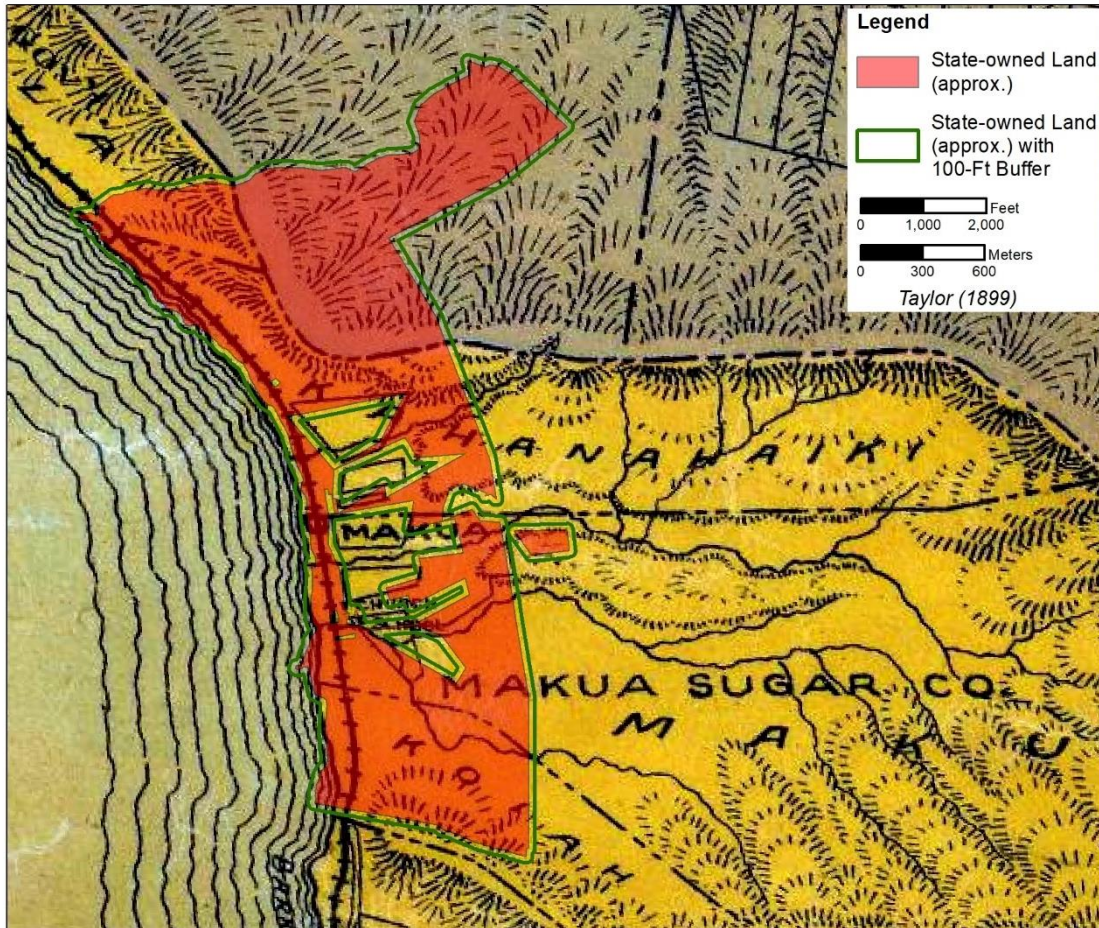
Aside from the LCA parcels, the remaining lands of Mākua and Kahanahāiki Ahupua'a became the property of the Hawaiian Government and the Kingdom. Consequently, most of the MMR lands were later converted to ranchland under a succession of government leases and fee-simple purchases of the LCA parcels. By 1864, most of Mākua and Kahanahāiki had been placed under a 25-year lease to Joseph and John Booth for cattle ranching. In 1873, the lease was transferred to Samuel Andrews, who lived at Mākua until about 1901 (Kelly and Quintal 1977:47). Andrews's ranch, named Makua Stock Ranch, was described as having 500 head of cattle and 5,000 acres of grazing land (McKenney 1884, in Kelly and Quintal 1977:

45). Andrews built his family house at Kahanahāiki on the land parcel originally awarded as LCA 9053 to Keolohua (Zulick and Cox 2001b:15). Andrew’s clam is illustrated on an 1876 map of O’ahu (Figure 11).

Ranch lands in Mākua transitioned to commercial sugar production at the turn of the 20th century. A portion of an 1899 map of O’ahu (Figure 12) provides a glimpse of this land use: the Makua Sugar Company is illustrated in Mākua along with a church and school. Lincoln L. McCandless, an artesian well driller, took over the Mākua lease in the early 1900s. Except for a few years when it was leased to Frank Woods, the lands at Mākua and Kahanahāiki remained under control of McCandless Ranch until the U.S. military took over in 1942. Aside from sugar, the lower portions of Mākua Valley were favorable for growing cucumbers, watermelons, pumpkins, sweet potatoes, cotton, tobacco, and corn according to local informants (Kelly and Quintal 1977:18).



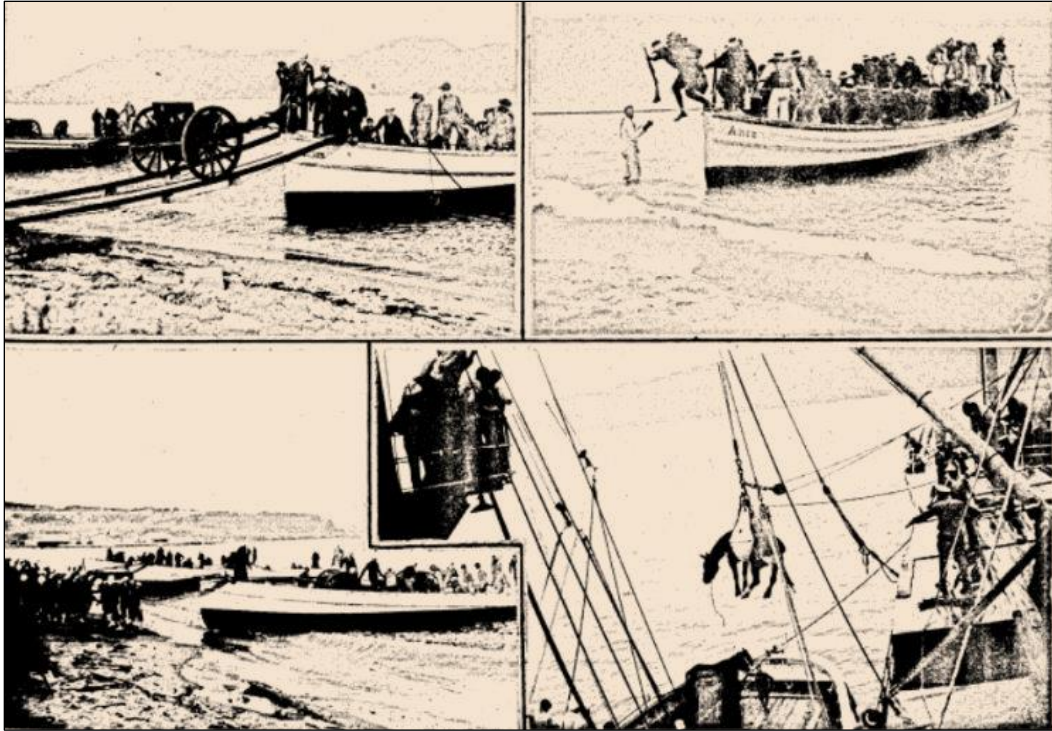
**Figure 11. Portion of Hawai’i Registered Map 1380 (Lyons 1876) showing Samuel Andrews’s homestead (circled in red) in 1876.**



**Figure 12. Portion of Taylor’s (1899) map of O’ahu depicting the Makua Sugar Company in Mākuā Valley.**

### 2.1.5.2 U.S. Military Land Use

The U.S. military began its presence in Mākuā in 1929, when three parcels were granted to the U.S. Government by Territory of Hawai’i Governor Wallace Rider Farrington (these parcels were later returned to the Territory of Hawai’i). The parcels were used for the installation of defensive “Panama Mount” type gun emplacements (Zulick and Cox 2001b:20), which were installed in several strategic locations throughout O’ahu in the decade before World War II. In 1932, the Army and Navy conducted an amphibious assault training exercise, “invading” the Wai’ānae Coast in small ships loaded with 640 personnel and 100 horses, along with wagons and other equipment. The landing at Mākuā Beach was launched from a Naval ship following a simulated aircraft bombing (Zulick and Cox 2001b:21; Mann 1932) (Figure 13). The U.S. began conducting live fire and other training activities within MMR in 1942 when martial law was declared following the bombing of Pearl Harbor, with live-fire training activities ceasing in 2004. The State-owned land within the ROI has been leased since 1964.



**Figure 13. Photo collage of the Army and Navy’s amphibious assault training at Mākua in 1932, from Mann (1932:107).**

## **2.2 KAHUKU TRAINING AREA (KTA)**

This section provides the environmental and cultural-historical setting of the approximately 1,268-acre ROI for KTA within the Ko’olauloa District.

### **2.2.1 Environmental Context at KTA**

The ROI for KTA is situated on the northwestern footslope of the Ko’olau Mountains (Tract A-3) and a level tableland formed by Waiale’e Gulch behind the coastal flat (Tract A-1). Elevations within the ROI for KTA range from approximately 21 to 209 meters (70 to 685 feet) amsl in the northern (Tract A-1) parcel and from 155 to 417 meters (510 to 1,370 feet) amsl in the southern (Tract A-3) parcel. Annual rainfall within KTA area ranges from approximately 1,130 millimeters (44.5 inches) in the northern portion closest to the water to 1,600 millimeters (63 inches) in the tablelands behind the coastal plain (Giambelluca et al. 2013). Koleleiki and Paumalū streams flow northwest through the southern (Tract A-3) parcel and Waiale’e Gulch carries water through the northern (Tract A-1) parcel before joining Pahipahi’alua Stream near its outlet near Waiale’e Beach Park, approximately 800 meters (0.5 mile) north of the ROI for KTA.

Vegetation at KTA has been heavily altered through historic ranching activities and pineapple and sugarcane cultivation and includes non-native grasses, drought-resistant trees, Polynesian introductions, and a few indigenous Hawaiian plant species. According to Sohmer and Gustafson (1987:145–154) and Anderson and Williams (1998:14), the lowlands and degraded slopes consist of the grasses *Miscanthus* sp. and *Gramineae* spp., as well as historically introduced tree species such as ironwood (*Casuarina equisetifolia*), kuawa (*Psidium guajava*, guava), kiawe, wilelaiki (*Schinus terebinthifolius*, Christmas berry), ‘alakapaika (*Pimenta dioica*, allspice), and koa haole. Kukui (*Aleurites moluccana*, candlenut) is a Polynesian introduction that persists in valley interiors. Indigenous Hawaiian plants previously identified in the uplands of KTA include hāpu‘u (*Cibotium menziesii*, tree fern) and ‘ōhi‘a (*Metrosideros* sp.).

Soils mapped within the southern parcel (Tract A-3) of the ROI for KTA are comprised almost entirely of Kapaa silty clay (Figure 14). The soils within the northern parcel (Tract A-1) follow the drainages along the lower portions of Waiale‘e Gulch and are comprised almost entirely of silty clays of the Kemoo and Paumalu series (see Figure 14). Approximately 49 acres along the northern and eastern perimeters of this northern parcel are comprised of Stony steep and Rock lands, representing less than 4 percent of the ROI for KTA (see Figure 14).

### **2.2.2 Traditional Land Use**

The windward region of O‘ahu was populated soon after the initial settlement of the Hawaiian archipelago around AD 600 (Kirch 1985:107). Hawaiian settlements eventually expanded from coastal environs into more marginal regions of O‘ahu (Williams and Patolo 1998:35; Patolo et al. 2010:5). The upland slopes of the ROI for KTA are marginal when compared with the resource-rich coastal strand below. One Traditional Hawaiian habitation site (SIHP Site 50-80-02-4887) is located within the ROI for KTA, comprised of a complex containing an enclosure, mounds, possible walls, and a platform situated between Kaunala Gulch and Waiale‘e Gulch. While no radiocarbon dates have been obtained from Site -4887, archaeological samples from excavations at SIHP Site 50-80-02-4884 (within KTA but outside the State-owned land) have produced calibrated dates ranging from AD 1490 to 1680 and from AD 1770 to 1800 (Williams and Patolo 1998:60).

Appendix B (Cultural Impact Assessment) of the EIS for ATR on O‘ahu contains additional information on traditional land use at KTA (Craft et al. 2023).

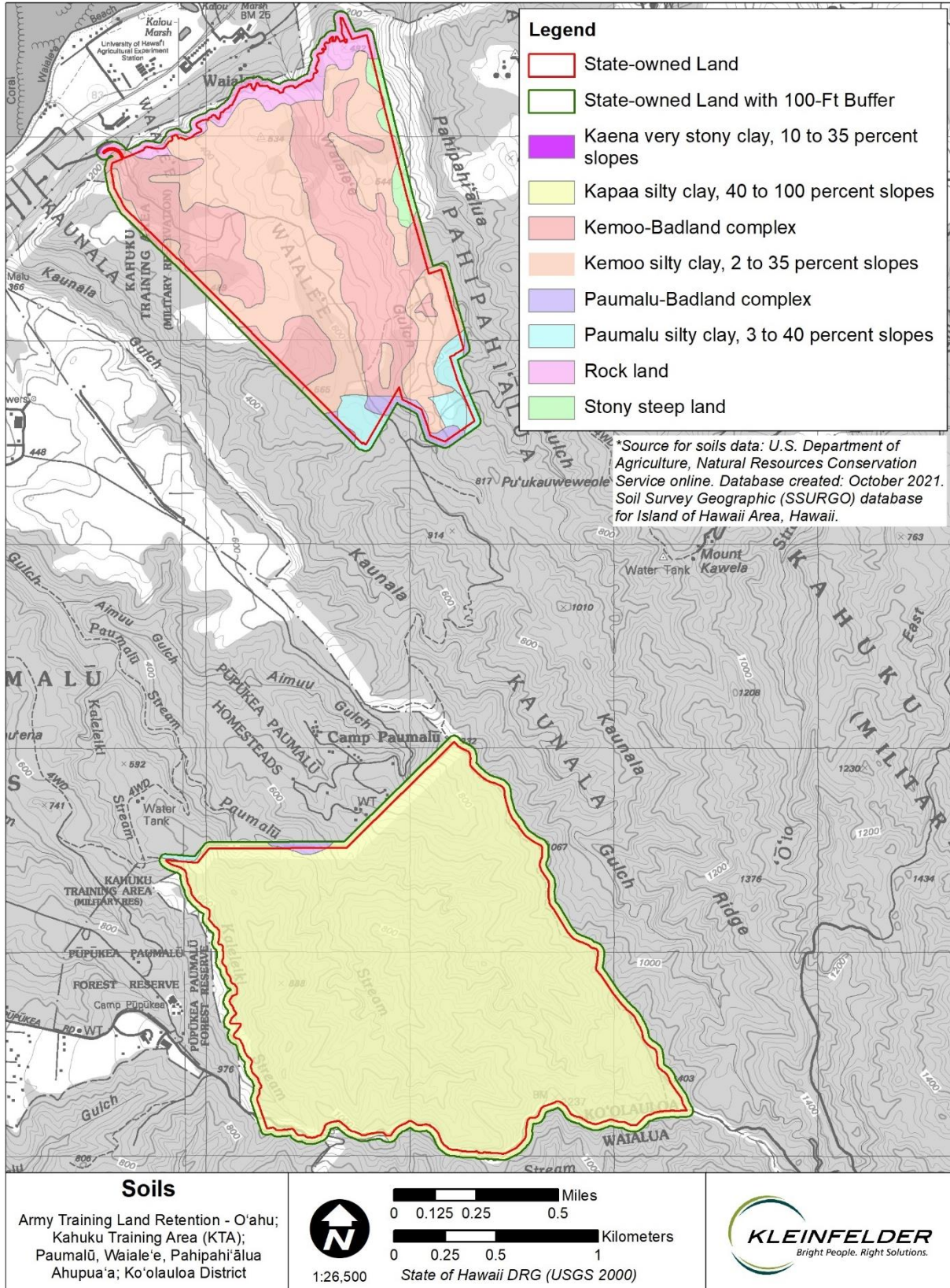


Figure 14. Soils mapped within the ROI for KTA.

### **2.2.3 Early Historic Period Accounts**

Historical accounts of the Kahuku area are few, and often pose conflicting information concerning the socio-environmental conditions of the northern coast of O‘ahu. The earliest historical account of the area comes from Charles Clerke, who assumed command of the H.M.S. Resolution following the death of Captain Cook in 1779:

Run round the Noern [northern] Extreme of the Isle [O‘ahu] which terminates in a low point rather projecting [Kahuku Point]; off it lay a ledge of rock extending a full Mile into the sea, many of them above the surface of the water; the country in this neighborhood is exceedingly fine and fertile; here a large Village, in the midst of it run up a large-Pyramid doubtlessly part of a Morai. [Beaglehole 1967:572, Part One, Vol III]

David Samwell, a surgeon on the H.M.S. Resolution expedition, describes the abundance of resources observed along the coastline at Waimea, several miles west of the ROI for KTA:

The Island has a pleasant Appearance, having much wood upon it; the Land is in general high...the Island produces plenty of breadfruit, Cocoa nuts, Plantains, Yams, Taroo root & sweet potatoes & Sugar canes...there are many hogs upon it. [Beaglehole 1967:1221, Part Two, Vol III]

In contrast, Captain George Vancouver’s observation of the area 15 years later describes a land that did not appear to be flourishing and lacked a sufficient population (Vancouver 1978, Vol 3:7). Yet, John Papa ‘I‘i describes the area as, “a delightful land, well provisioned” and noted, “[t]here was a pond there, surrounded by taro patches, and there were good fishing places inside the reef” (‘I‘i 1983:24).

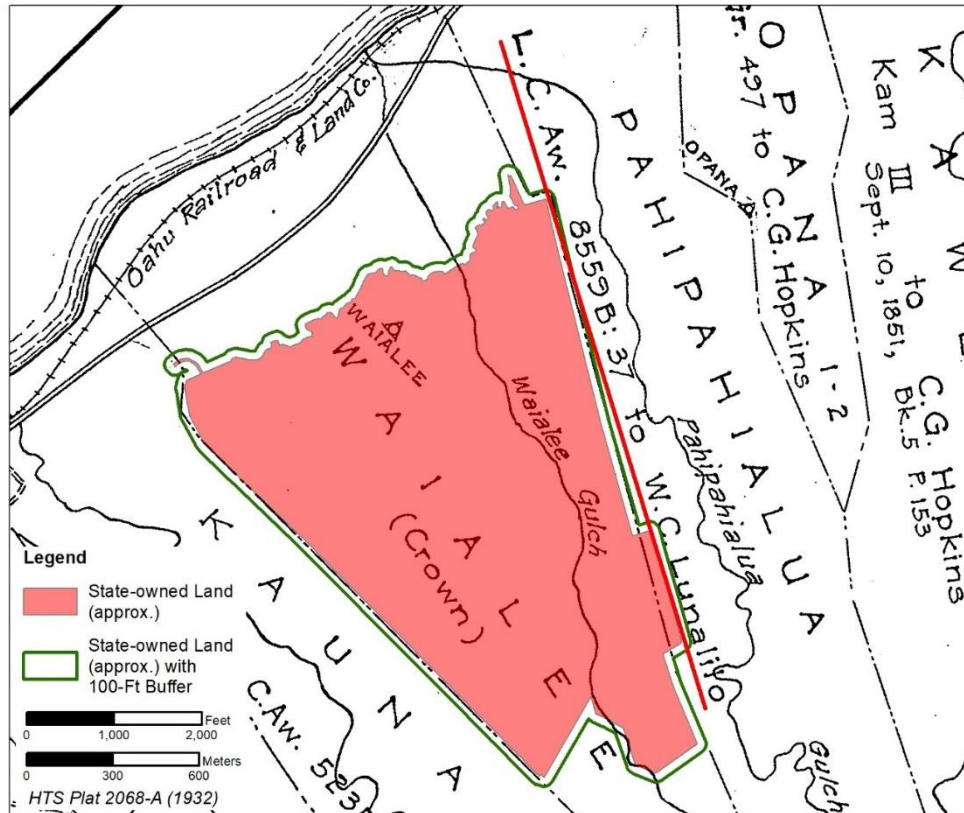
### **2.2.4 The Māhele ‘Āina and Land Tenure Change**

See Section 2.1.4 for general information on the Māhele ‘Āina.

#### **2.2.4.1 LCA and Kuleana Claims**

One LCA was awarded within the ROI for KTA (Figure 15). This claim was awarded to William C. Lunalilo under LCA 8559B:37, which constituted a multi-parcel claim that included the entire 950-acre ahupua‘a of Pahipahi‘ālua. LCA records from this period indicate residential and agricultural activities had continued to center along the coast during the mid-19th century, rather than the upland plateau and slopes of the ROI for KTA.





**Figure 15. Portion of Hawai'i Territorial Survey Plat Map 2068A (King 1932) showing LCA 8559B:37 (underlined in red) which encompassed all of Pahipahi'ālua Ahupua'a, including a small section of the ROI for KTA.**

## 2.2.5 Historic Period Land Use

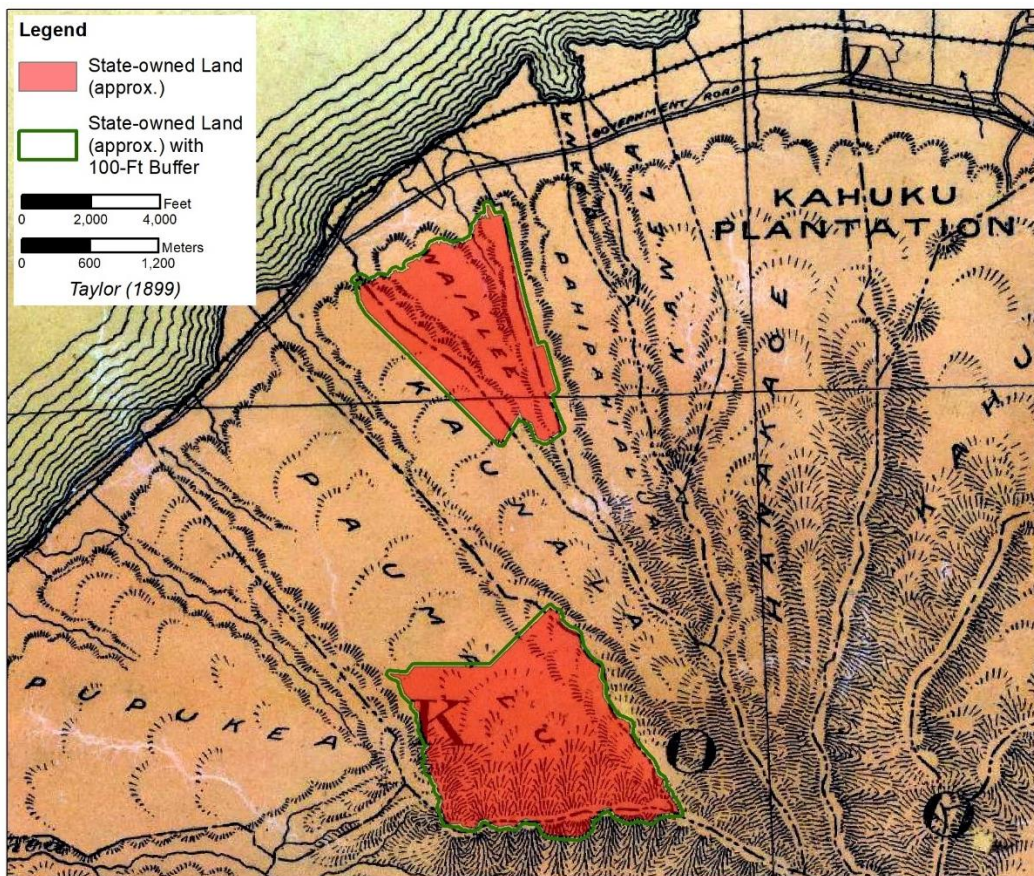
Following the Māhele, foreign investors began acquiring large tracts of land on O'ahu for ranching, and later, agricultural development. Historic Period land use at KTA included commercial ranching, agriculture, and eventually U.S. military use.

### 2.2.5.1 Commercial Ranching and Agriculture

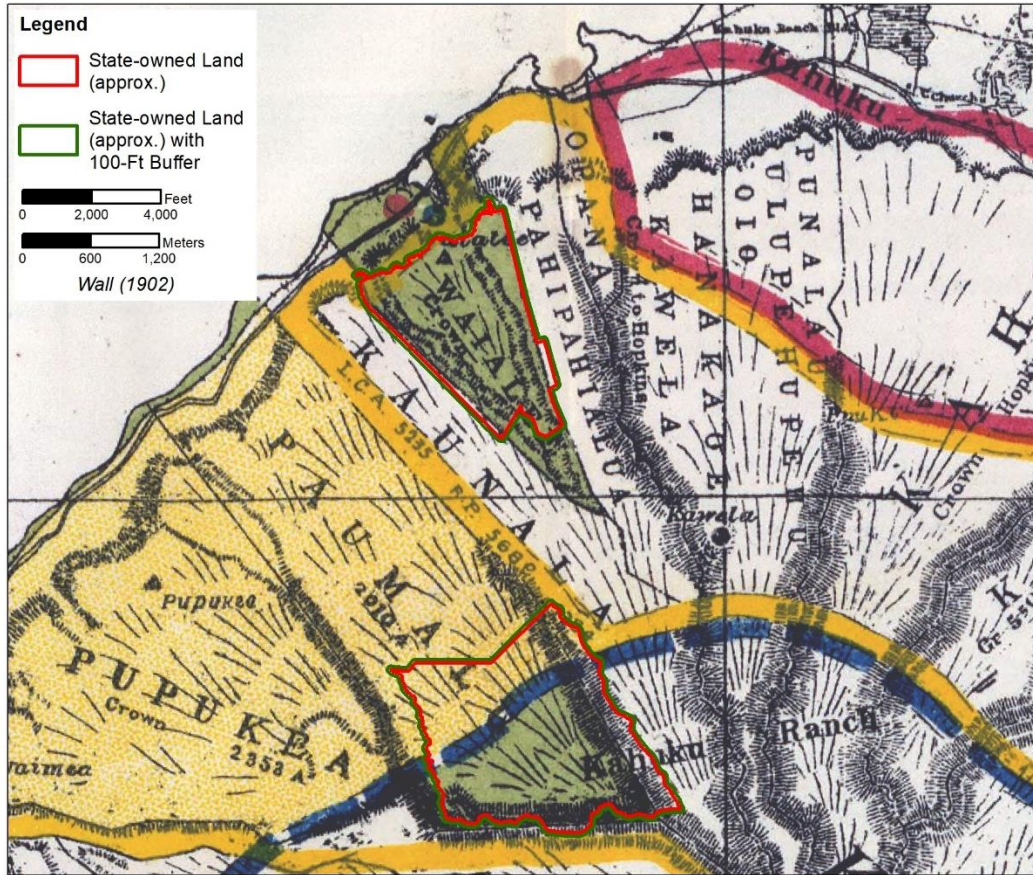
In 1852, Robert Moffitt founded the Kahuku Ranch where he raised cattle and sheep. Although Kahuku Ranch was located well outside of the ROI for KTA, near the present town of Kahuku, it is an important development for eventual land use within the ROI for KTA. Between 1867 and 1873, the Kahuku Ranch merged with another large ranch in the region, Malaekahana Ranch, and both were eventually sold in 1876 to James Campbell, a sugar planter from Lahaina, Maui (Williams and Patolo 1998:20). Campbell soon partnered with James Castle and Benjamin Dillingham to form the Kahuku Plantation Company, which was chartered in 1890 (Williams and Patolo 1998:21) and included rail lines and a mill facility that processed and transported sugarcane (Figure 16 and Figure 17). According to a 1902 map of O'ahu by Wall (1902), the plantation's facilities were located outside ROI, although Wall depicts cattle grazing and forest reserves occurring within the ROI (Wall 1902) (Figure 18).



**Figure 16. Rail carts filled with sugarcane and smokestack in distance at Kahuku Plantation (Ramsay 1966).**



**Figure 17. Portion of Taylor (1899) map of O'ahu showing the Kahuku Plantation in 1899.**



**Figure 18. Portion of Wall's (1902) map of O'ahu depicting land use at the beginning of the 20th century; yellow outline denotes "Approximate Area of Grazing Lands", blue outline denotes "Forest Reserves", yellow areas denote "Homestead Settlement Tracts", and green areas denote "Public Lands".**

### 2.2.5.2 U.S. Military Land Use

Early military endeavors in the KTA region, which began in 1931, were associated with coastal defense and the initiative to secure and fortify the coast around O'ahu. None of these activities, however, appear to have occurred within the ROI for KTA (Farrell and Cleghorn 1995:7; Bennett 2012:26). Following the Japanese air attack of Pearl Harbor on December 7, 1941, military defensive construction on O'ahu increased substantially. At this time, the largest wartime effort in the Kahuku Region was the construction of the Kahuku Airfield between 1941 and 1942, which lies outside of the ROI for KTA. The military remained active in KTA until late 1945; although, activities within the ROI for KTA are unclear.

In 1945, many of the military facilities at KTA were no longer necessary and were declared surplus (USACE-OCE 1945). While military activity may have abated, KTA continued to expand well into the 1950s. In 1956, KTA was expanded when an additional 3,700 acres was leased to the U.S. Government by the California

Packing Company and the James Campbell Estate (Nakamura 1981:14). KTA has since expanded to its current size of 9,480 acres.

### **2.2.5.3 Current Non-Military Land Use**

An approximately 28-acre portion of the northern (Tract A-1) parcel of the ROI for KTA is currently used by the public for recreational off-highway vehicle activities at the Kahuku Motocross Park, which is permitted by the State of Hawaii's Department of Land and Natural Resources. Currently, public access is available on Saturdays, Sundays, and federal holidays. Recreational hiking, biking, and hunting are also practiced within the ROI for KTA.

## **2.3 KAWAILOA-POAMOHO TRAINING AREA (POAMOHO)**

This section provides the environmental and historical background for the approximately 4,582-acre ROI for Poamoho within the Waialua District.

### **2.3.1 Environmental Context**

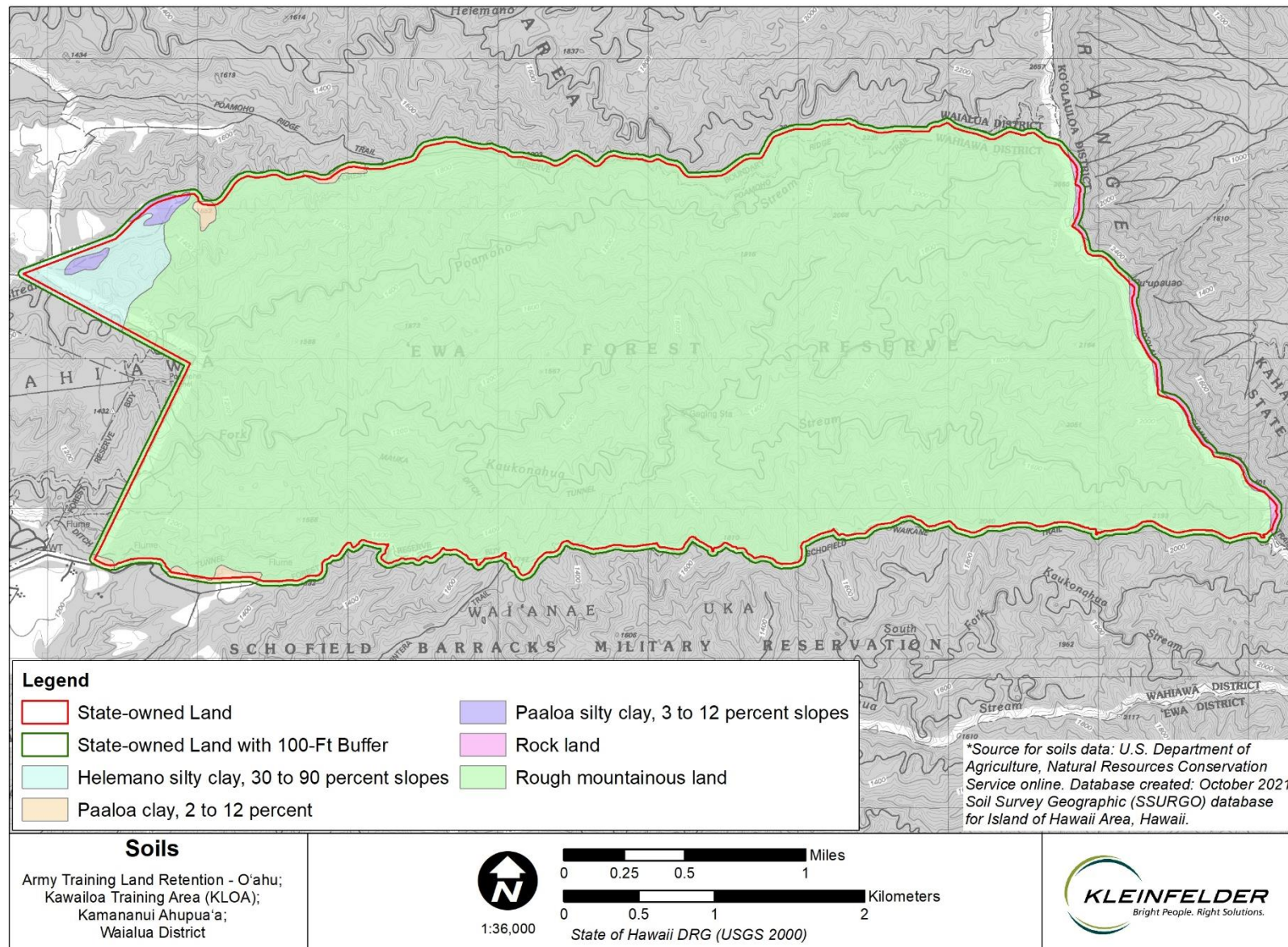
The ROI for Poamoho, also designated as the 'Ewa Forest Reserve, is situated in the easternmost portion of Kamananui Ahupua'a within the Waialua District. Elevations within the ROI for Poamoho range from approximately 295 to 795 meters (970 to 2,600 feet) amsl, while annual rainfall varies from approximately 2,000 millimeters (79 inches) in the western portion to 5,000 millimeters (197 inches) in the eastern, Ko'olau portion (Giambelluca et al. 2013). Vegetation within Poamoho parcel varies greatly from riparian communities situated along the many drainages to sparse, hardy shrubs along exposed rocky ridges.

More than 97 percent (4,456 acres) of soils mapped within the ROI for Poamoho are classified as Rock and Rough mountainous lands (Figure 19). The remaining portion is comprised of clays and silty clays of the Paaloo and Helemano series. These are situated in the far western end of the parcel (see Figure 14) and represent the eastern extent of the dissected tablelands which slope northwest from Wahiaiwā towards the coast at Hale'iwa.

### **2.3.2 Traditional Land Use**

The ROI for Poamoho is comprised of rugged, steep topography in the remote interior of O'ahu and is heavily vegetated, receiving some of the highest levels of rainfall on the island. Intensive Traditional Hawaiian activity in the region was likely low compared to coastal regions and flatter inland areas for these reasons; however, no cultural resource surveys have been conducted within the ROI for Poamoho to verify this statement.

Appendix B (Cultural Impact Assessment) of the EIS for ATR on O'ahu contains additional information on traditional land use at Poamoho (Craft et al. 2023).



**Figure 19. Soils mapped within the ROI for Poamoho.**

### **2.3.3 Early Historic Period Accounts**

There are no known early historic-period accounts that refer specifically to the ROI for Poamoho; most historical mentions of the general region of the central plain focus on Wahiawā, southwest of Poamoho.

### **2.3.4 The Māhele ‘Āina and Land Tenure Change**

See Section 2.1.4 for general information on the Māhele ‘Āina.

#### **2.3.4.1 LCA and Kuleana Claims**

During the Māhele ‘Āina, Kamananui Ahupua‘a, which included the Wahiawā area, was designated as Government Land. An 1899 map of O‘ahu depicts the ROI for Poamoho as “School Land” within Wahiawā (Figure 20). No LCAs were awarded within the ROI for Poamoho.

In 1852, Grant 973 was issued to James Robinson, Robert Lawrence, and Robert W. Holt, which consisted of 2,128 acres directly west of the ROI for Poamoho (see Figure 20). This land grant, and others throughout the central region of O‘ahu, were instrumental in the development of the commercial pineapple industry in the late 19th and early-20th centuries. Grant 973 was situated between the gulches of Poamoho and Kaukonahua, encompassing today’s Whitmore Village and the Naval Computer and Telecommunications Area Master Station Pacific (NCTAMS PAC) facilities north of Wahiawā.

### **2.3.5 Historic Period Land Use**

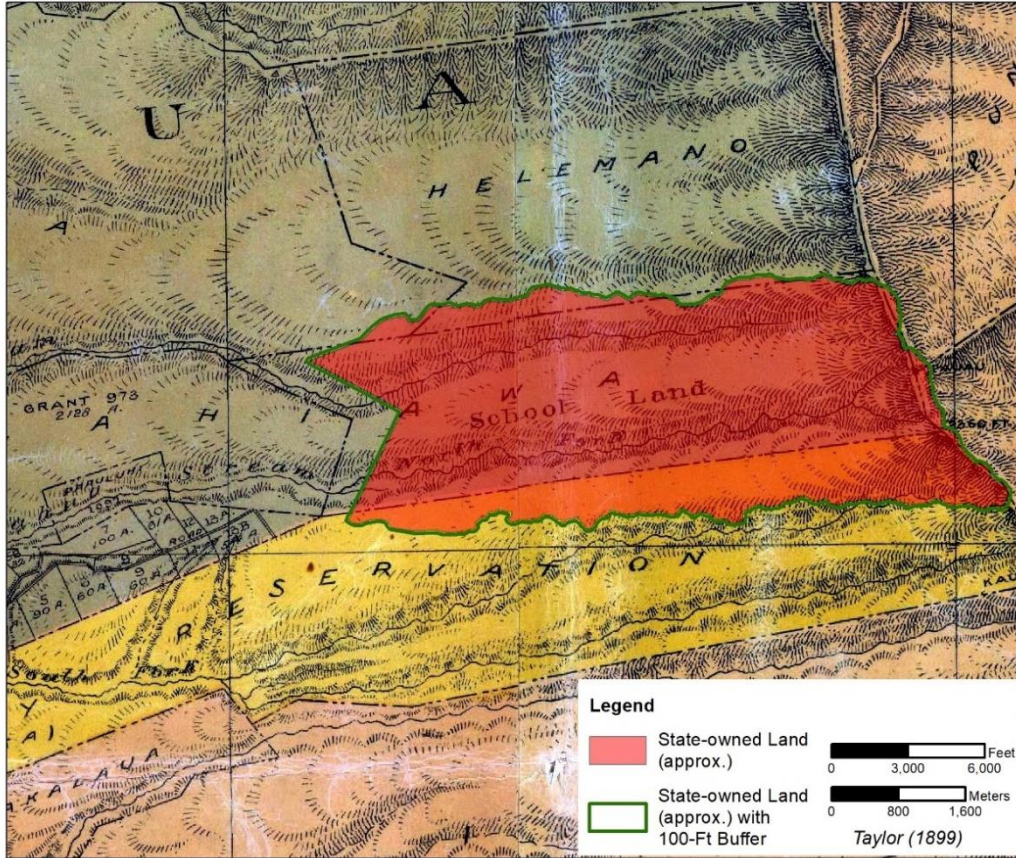
While the ROI for Poamoho has remained essentially undeveloped, the flat plains to the west were recognized shortly after Western contact as a valuable area for its natural resources and arable land.

#### **2.3.5.1 Commercial Agriculture**

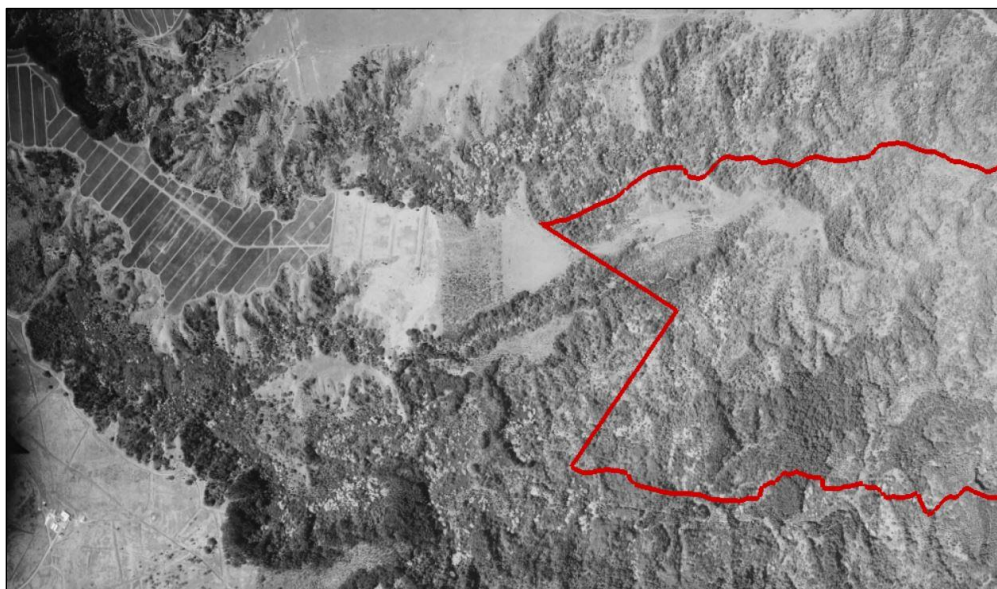
Beginning in the early 20th century, pineapples were grown throughout the region to the west of the ROI for Poamoho, extending northwest along the Poamoho and Helemano stream gulches. The northwest corner of the ROI for Poamoho was altered by these agricultural activities but was limited due to the rugged topography and limited vehicular access (Figure 21; USAG-HI 2018).

#### **2.3.5.2 U.S. Military Land Use**

The ROI for Poamoho is part of the larger KLOA that was established as a troop maneuver and training area in 1955. Along with aviation training, mountain and jungle warfare training was conducted by small units within KLOA; although, under the current lease, only aerial training is permitted within the ROI for Poamoho (USAG-HI 2018:54). Today, the U.S. military conducts low-altitude helicopter aviation training within the ROI for Poamoho and maintains several helicopter landing zones in the northwest corner of the parcel.



**Figure 20. Portion of Taylor (1899) map of O’ahu depicting Grant 973 and the ROI for Poamoho as “School Land” within Wahiawa in 1899.**



**Figure 21. Western portion of State-owned land for Poamoho (outlined in red) depicted on USGS 1952 aerial showing pineapple fields to the west with historic agricultural land alteration extending into the northwest corner of the parcel.**

### 3 ARCHAEOLOGICAL CONTEXT

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This section provides a summary of previously conducted cultural resource studies and previously recorded historic and cultural resources within the individual ROIs for MMR, KTA, and Poamoho. Whenever possible, archaeological sites are referred to using the unique portion of the Hawaii State Inventory of Historic Places (SIHP) site numbers.

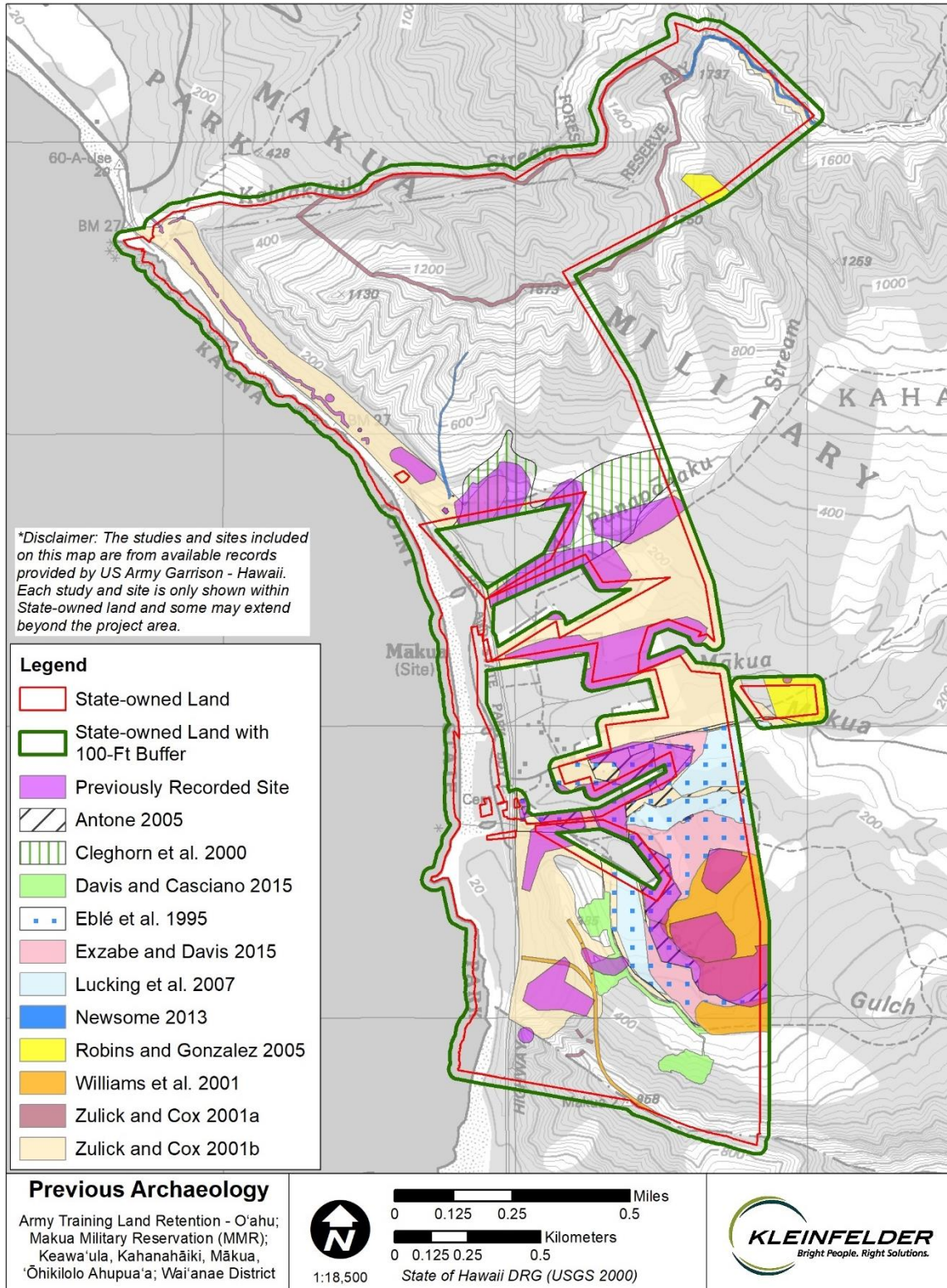
#### 3.1 PREVIOUS CULTURAL RESOURCE STUDIES AT MMR

Cultural resource surveys of Mākuā Valley began in the late 1970s. Of the approximately 982 acres that comprise the ROI for MMR, approximately 681 acres have been subjected to intensive identification efforts. The remaining 301 acres are unsurveyed or were subjected to reconnaissance studies that do not provide as thorough of an understanding of extant cultural resources due to the low intensity of the survey coverage. Activities that trigger a cultural resources study (e.g., a Section 106 undertaking) have not occurred as frequently in these unsurveyed portions of the ROI due to the nature of the steep terrain. Cultural resource investigations conducted within portions of the ROI for MMR include eleven studies that meet USAG-HI's current standards and are discussed below (Figure 22; Table 1).

In 1992, Biosystems Analysis, Inc. conducted an archaeological investigation (Eblé et al. 1995) of 477 acres in the southwestern portion of MMR that included portions of the ROI (see Figure 22). Twelve archaeological sites (SIHP Sites 50-80-03-4536 to -4547) were identified during the Eblé et al. (1995) study (see Table 3), including five (Sites -4541, -4543 to -4546) within or partially within the ROI for MMR. These sites contained Traditional Hawaiian stacked rock features (walls, terraces, enclosures, mounds, etc.), some containing subsurface thermal features, midden deposits, artifacts, and Historic Period components. Limited subsurface testing was conducted at Sites -4542, -4543, and -4544 (Sites -4543 and -4544 are within the ROI for MMR while Site -4542 is outside the ROI for MMR); analysis of radiocarbon samples from culturally enriched midden places these three sites within an overall adjusted date range of A.D. 1535–1950 (Eblé et al. 1995:11-2).

Ogden Environmental and Energy Services Co., Inc. conducted an archaeological investigation (Williams et al. 2001) involving archaeological monitoring of fenceline improvements in the southwestern portion of MMR in 1997 and subsequent surveys of approximately 100 acres in 1998, which also included subsurface testing at three sites (Sites -4543, -4544, and -4546) within or partially within the ROI for MMR (see Figure 22). Two new sites were identified during archaeological monitoring within the ROI for MMR, including SIHP Sites 50-80-03-5734 (L-shaped enclosure) and 50-80-03-5735 (lithic scatter).





**Figure 22. Previously conducted cultural resource studies and historic and cultural resources within the ROI for MMR.**

**Table 1. Previous Cultural Resource Studies Conducted within the ROI for MMR\***

TITLE	REFERENCE	STUDY TYPE	SUMMARY OF FINDINGS
Archaeological Investigations at Proposed MK-19 Range, Makua Military Reservation, Hawaiian Islands Wai‘anae District, O‘ahu, Hawai‘i	Eblé et al. 1995	Reconnaissance survey with limited subsurface testing	Twelve sites (Sites -4536 to -4547) investigated, five (Sites -4541 and -4543 to -4546) within the ROI. Sites -4542 to -4544 subjected to subsurface testing.
Historic Preservation Studies and Investigations for Firebreak Road Improvements at the U.S. Army Makua Military Reservation, O‘ahu Island, Hawai‘i	Williams et al. 2001	Intensive and reconnaissance level surveys with subsurface testing and archaeological monitoring	Three new sites identified (Sites -5734, -5735, and -5595), two (Sites -5734 and -5735) within the ROI. New features identified at six previously recorded sites (Sites -4542 to -4547), four sites (Sites -4543 to -4546) within the ROI. Sites -4543, -4544, and -4546 subjected to subsurface testing.
Archaeological Reconnaissance Survey of Proposed Fencelines within Makua Military Reservation, (MMR), Oahu Island, Hawaii	Zulick and Cox 2001a	Reconnaissance survey	No sites identified.
Phase I Inventory Survey of Cultural Resources on Makua Military Reservation, Island of O‘ahu, Hawai‘i	Zulick and Cox 2001b	Reconnaissance survey	Thirteen new sites (Sites -5920 to -5932) identified. Six (Sites -5925 to -5927 and -5930 to -5932) within the ROI. New features identified at three sites (Sites -4538, -4542, and -4544), one (Site -4544) within the ROI.
Final Report Initial Implementing Activities for the Historic Preservation Plan at Ukanipō Heiau and Intensive Survey and Mapping of Archaeological Sites, Ukanipō Heiau Vicinity, Mākua Military Reservation, Mākua Valley, Oahu Island.	Cleghorn et al. 2002	Reconnaissance survey and site mapping	Five sites (Sites -0181 and -5775 to -5778) documented. Four sites (Sites -0181 and -5775 to -5777) within the ROI.
End of Fieldwork, August 2005, Burn Area at Makua Military Reservation (MMR) Wai‘anae District, O‘ahu Island	Antone 2005	Reconnaissance survey	Two new sites (DPW-033 and Site 2) identified, one (DPW-033) within the ROI. New features identified within three sites (Sites -4542, -4543, and -4546), two sites (Sites -4543 and -4546) within the ROI.

**Table 1. (cont.)**

TITLE	REFERENCE	STUDY TYPE	SUMMARY OF FINDINGS
Final Archaeological Survey and Protection of Cultural Resources During UXO Clearance Activities, Makua Military Reservation, Kahanahāiki and Makua Ahupua‘a, Wai‘anae District, Island of O‘ahu, Hawai‘i (TMK 8-2-01)	Robins and Gonzalez 2005	Reconnaissance survey and monitoring.	Fifty-nine sites identified (Sites - 6499 to -6514, -6525 to -6528, and -6593 to -6631), one (Site 6527) within the ROI.
Archaeological Subsurface Survey Within the Company Combined Arms Assault Course (CCAAC) Circumscribed by the South Firebreak Road, Makua Military Reservation, Mākua Ahupua‘a, Wai‘anae District, O‘ahu Island, Hawai‘i (TMK 8-2-01:020)	Lucking et al. 2007	Subsurface testing	Confirmed that upper soil horizons had been completely removed during MMR construction activities. Three new sites identified (no descriptions or designations given).
Archaeological Pedestrian Survey for a Proposed Ungulate Control Fence located on Kahanahaiki Ridge, O‘ahu, Hawai‘i.	Newsome 2013	Reconnaissance survey	No findings.
Archaeological Survey Report for the Lower ‘Ōhikilolo Management Unit Outplanting Project Area at Makua Military Reservation, Mākua Ahupua‘a, Wai‘anae District, O‘ahu Island, Hawai‘i.	Davis and Casciano 2015	Reconnaissance survey	New features (possible cairn and old road bed) not designated as sites.
Archaeological Subsurface Survey in Areas B Through F at Makua Military Reservation, Mākua Ahupua‘a, Wai‘anae District, O‘ahu Island, Hawai‘i	Exzabe and Davis 2015	Subsurface testing	New features possibly associated with two sites (Sites -4542 and -4545) identified outside the ROI. Isolated Traditional Hawaiian artifact collected from within a shovel test pit near Site -4546.

\* Studies not approved for use by USAG-HI are not included.

In 2001, USAG-HI Cultural Resources staff conducted an archaeological investigation (Zulick and Cox 2001a) for the installation of three fence segments located on 'Ōhikilolo Ridge and an ungulate control enclosure extending from Kahanahaiki Ridge to Kaluakauila Stream (see Figure 22). Two features, not located within the ROI for MMR, were encountered during the survey, including a small rock mound and a C-shaped enclosure within the enclosure portion of that study's project area. The features were interpreted as being associated with recent hiking activity or military use of the area.

Between 1999 and 2001, USAG-HI conducted an extensive Phase I survey and revisited 20 previously identified sites at MMR (Table 2), investigating a total area of 771 acres (Zulick and Cox 2001b) (see Figure 22). Fifty-eight new features were identified at previously identified sites (Zulick and Cox 2001b:37); one of these sites, Site -4544, is located within the ROI for MMR, which contained two of these 58 features. Thirteen new sites were identified (SIHP Sites 50-80-03-5920 to -5932) during the survey, including seven (Sites -5925 to -5927 and -5929 to -5932) within or partially within the ROI for MMR. These sites included walls, mounds, terraces, modified outcrops, rock alignments, enclosures, and platforms, some associated with large agricultural complexes (Zulick and Cox 2001b:51–52). Site -5929 is a gun emplacement and Site -5932 is an old trail or early road segment located partially within the ROI for MMR.

In 1998, Ogden Environmental and Energy Services Co., Inc. conducted cultural resource surveys and detailed site mapping (Cleghorn et al. 2002) in the vicinity of Ukanipō Heiau following a large-scale range fire that burned the area (see Figure 22). Five archaeological site complexes, including four (SIHP Sites 50-80-03-0181 and 50-80-03-5775 to -5777) within or partially within the ROI for MMR, were documented during that study including Ukanipō Heiau (Site -0181) where 44 features were recorded (Cleghorn et al. 2002:17). Four large site complexes (Sites -5775 to -5778) to the southeast of Ukanipō Heiau were also recorded, although one of these sites (Site -5778) is not within the ROI for MMR.

USAG-HI Cultural Resources staff conducted an archaeological survey (Antone 2005) of recently burned areas at MMR following a range fire that occurred in August 2005 (see Figure 22). During the survey, 57 new features were added to Sites -4542, -4543, and -4546; however, Site -4542 is not located within the ROI for MMR, and Sites -4543 and -4546 are partially within the ROI for MMR. In addition, two new temporary site numbers (Sites 2 and 3), containing three new features, were assigned; one of these newly identified sites (Site 3) appears to correspond with the location of Site DPW-033, which is within the ROI for MMR, while Site 2 appears to be outside the ROI for MMR. No descriptions are given for any of the features recorded during the survey.

**Table 2. Historic and Cultural Resources Revisited During the Zulick and Cox (2001b:37) Survey**

SIHP NUMBER (50-80-03-)	DESCRIPTION	REFERENCE	SUMMARY OF FINDINGS
0181*	Ukanipō Heiau	Thrum 1906; Hommon 1980; Cleghorn et al. 2002	None.
4536	Rock-lined well and walls	Eblé et al. 1995	None.
4537	Mounds and walls	Eblé et al. 1995	None.
4538	Enclosure and C-shape	Eblé et al. 1995	One military feature (concrete gun emplacement) added to site.
4539	Retaining wall	Eblé et al. 1995	None.
4541*	Walls	Eblé et al. 1995	None.
4542	Agricultural and habitation complex	Eblé et al. 1995	Four new features (platform, ahu, and two retaining walls) added to site.
4543*	complex	Eblé et al. 1995	One new feature (modified boulder) added to site.
4544*	complex	Eblé et al. 1995	Two new features (mounds) added to site.
4545*	complex	Eblé et al. 1995	None.
4546*	Enclosure and platform	Eblé et al. 1995	None.
4547	complex	Eblé et al. 1995	None.
4630	complex	Carlson et al. 1996	None.
5456	Earth oven complex	Williams et al. 2001	None.
5595	Wall and enclosure	Williams et al. 2001	None.
5734*	Temporary shelter	Williams et al. 2001	None.
5735*	Lithic scatter	Williams et al. 2001	None.
9518	Trail	Rosendahl 1977	None.
9525*	Wall	Rosendahl 1977	None.
9533*	Platform	Rosendahl 1977	None.

\* All or portions of site located within the ROI for MMR.

In 2002 and 2003, Robins and Gonzalez (2005) conducted reconnaissance level surveys and archaeological monitoring of UXO clearance activities at MMR; a small, roughly 20-acre portion of that study's 530-acre project area is located within the ROI for MMR (see Figure 22). Fifty-nine sites (SIHP Sites 50-80-03-6499

to -6514, -6525 to -6528, and -6593 to -6631) were identified during that study, including 54 Traditional Hawaiian sites (eight of which contained post-Contact or modern features) and five historic sites (Robins and Gonzalez 2005:18). One of the sites (Site -6527) is located outside of State-owned land but within the 100-foot buffer for the ROI. Robins and Gonzalez (2005:25, 59, 101, 140, 150, 175) noted bomb craters, bullet damage, and UXO at several Traditional Hawaiian and Historic Period sites located outside the ROI. One of these bomb craters, however, was recorded either within or directly adjacent to the ROI. The exact location of this bomb crater is unclear, but it was recorded “to the immediate west” of Feature 6 of Site 6513, located just east of the ROI (Robins and Gonzalez 2005:59). At Site -6619, a Traditional Hawaiian wall complex located approximately 220 meters east of the ROI for MMR, two features (Features 1 and 3) were damaged during in-place UXO detonations which were monitored by USAG-HI archaeologists (Robins and Gonzalez 2005:175; Antone and Exzabe 2004:10, 15). Despite the installation of protective measures (plywood and sandbags), the western portion of Feature 1 was “severely impacted by the detonation of a 100-lb bomb” (Robins and Gonzalez 2005:150) that “forced some of that wall to be toppled” (Antone and Exzabe 2004:15), while Feature 3 “was largely demolished by the blast [of a 500-pound bomb] despite the protective measure taken” (Antone and Exzabe 2004:15).

Between November 2005 and December 2006, USAG-HI Cultural Resources staff conducted subsurface archaeological testing (Lucking et al. 2007) within a portion of the Company Combined Arms Assault Course (CCAAC) (see Figure 22). The subsurface testing study was a requirement completed to “satisfy the instructions set forth in the Makua Settlement Agreement and Stipulated Order dated 2001, *Mālama Mākua v. Rumsfeld, et al.*, (Civil No. 00-00813 SOM LEK)” (Lucking et al. 2007: Appendix A). While only two of the 550 shovel probes demonstrated a potential for yielding intact cultural deposits, three new archaeological site areas were identified within the “Area 2” portion of that project’s study area, with several features in each area, although no descriptions or number designations for these sites/features are given. Detailed recordation, mapping, and GIS data collection was “planned to be undertaken in a separate project by Cultural Resources archaeologists” (Lucking et al. 2007:i). Two of these unnumbered sites are described by Davis and Casciano (2015:17–18) as “mounds, terraces” and the third site is described as “kiawe fence posts, wire fencing”.

In 2013, USAG-HI Cultural Resources staff conducted a cultural resource study (Newsome 2013) for two segments of a proposed ungulate control fence on Kahanahaiki Ridge at MMR (see Figure 22); one of the fence segments is located within the ROI for MMR. No archaeological features were identified as a result of the survey (Newsome 2013:2).

In 2014, USAG-HI Cultural Resources staff conducted a cultural resource study (Davis and Casciano 2015) within the ROI for MMR in the Lower ‘Ōhikilolo Management Unit (see Figure 22). Two features identified

during the survey, comprising a possible cairn (Figure 23) that “may have originated from traditional times up to the modern era, and possibly even naturally formed” and a “possible old road bed” were not designated with site numbers; the authors stated the features lacked integrity and did “not meet any of the criteria for evaluation” (Davis and Casciano 2015:21). Dimensions for the features are not given, although a scaled photo of the cairn was included in the report (Davis and Casciano 2015:23) (see Figure 23).

In 2013, USAG-HI Cultural Resources staff conducted subsurface archaeological testing (see Figure 22) in accordance with the June 20, 2012, ruling by Judge Susan Oki Mollway of the U.S. District Court of Hawaii in the case of *Malama Makua v. Gates* (Exzabe and Davis 2015:i). Approximately 36 acres of that study’s 44-acre project area are located within the ROI for MMR. During that study, 83 of the planned 113 shovel test probes were excavated, and a previously unidentified surface feature likely associated with Site 4545 (located within the ROI for MMR) was identified (Exzabe and Davis 2015:i). Locational information of the new feature, comprised of a remnant shallow terrace, was collected but detailed recordation of the features did not take place (Exzabe and Davis 2015:30). One artifact, a basalt hammer stone (Figure 24), was collected from within a shovel test pit located outside the boundary of Site 4546 (within the ROI for MMR), at a depth of 20–30 centimeters below the surface, approximately 20 meters north of Site 4546 and within the ROI for MMR. The authors stated that the artifact was “considered an isolated find that may have been secondarily deposited in that location as a result of land modification attributed to previous ranching or military activities” (Exzabe and Davis 2015:43).



**Figure 23. Possible cairn identified by Davis and Casciano (2015:23).**



**Figure 24. Hammer stone recovered from excavations in the vicinity of Site -4546, from Exzabe and Davis (2015:65).**

### **3.1.1 Identified Historic and Cultural Resources Within the ROI for MMR**

According to GIS data provided by USAG-HI, 24 historic and cultural resources are located within or partially within the surveyed portions of the ROI for MMR (Table 3; see Figure 22). Traditional Hawaiian sites (Sites 0177, 0181, 4543 to 4546, 5735, 5775 to 5777, 5925, and 5926) are comprised of extant features (walls, mounds, terraces, a lithic scatter and petroglyph, etc.) related to Traditional land use: habitation, agricultural, travel, and ceremonial activities, including possible burials. Several of these Traditional Hawaiian sites (e.g., Sites 4543 to 4545, 5775, 5776, 5925, and 5926) also include Historic Period components. A natural geologic feature with cultural significance, Kāneana (Mākua) Cave (Site 0177), and the National Register of Historic Places-listed Ukanipō Heiau Complex (Site 0181) are also situated within the ROI.

Several large habitation complexes (Sites 5775 to 5777), located in the vicinity of Ukanipō Heiau and partially within the ROI for MMR, are situated along the lower segments of Punapōhaku Stream and an unnamed drainage, comprised of more than 190 features within a 35-acre plus area (Cleghorn et al. 2002:33–61). Many of these surface features are constructed of stacked basalt boulders which form walls, enclosures (Figure 25), terraces, mounds, and platforms that would have been utilized as permanent and temporary dwellings and activity areas, agricultural plots, and ceremonial and possible burial areas. Agricultural features, including earthen terraces, mounds, and retaining walls, were likely used to cultivate dry-land, non-irrigated crops such as ‘uala (sweet potato), kō (sugarcane), and ipu (gourd).



**Table 3. Historic and Cultural Resources Within the ROI for MMR**

<b>SITE NUMBER</b>	<b>DESCRIPTION</b>	<b>PERIOD</b>
50-80-03-0177	Kāneana (Mākua) Cave.	Traditional Hawaiian
50-80-03-0181	Ukanipō Heiau Complex, with terraces, walls, mounds, alignments, enclosures, C-shapes, depression, paving, and platform.	Traditional Hawaiian
50-80-03-4541	Walls and enclosures.	Historic
50-80-03-4543	Koʻiahi Gulch Complex, with enclosures, walls, mounds, terraces, C-shapes, thermal feature, and pits.	Traditional Hawaiian and Historic
50-80-03-4544	Koʻiahi Gulch Complex, with enclosures, alignments, terraces, mounds, and petroglyphs.	Traditional Hawaiian and Historic
50-80-03-4545	Mounds and wall.	Traditional Hawaiian and Historic
50-80-03-4546	Koʻiahi Gulch Complex, with enclosures, walls, and mound with upright stone.	Traditional Hawaiian
50-80-03-5734	Enclosure.	Undetermined
50-80-03-5735	Lithic scatter.	Traditional Hawaiian
50-80-03-5775	Habitation/agricultural complex, with enclosures, terraces, walls, mounds, alignments, modified outcrops, C-shapes, isolated Traditional Hawaiian artifact, and human skeletal remains.	Traditional Hawaiian and Historic
50-80-03-5776	Walls, terraces, mounds, and enclosures.	Traditional Hawaiian and Historic
50-80-03-5777	Mound (possible shrine).	Traditional Hawaiian
50-80-03-5925	Enclosures, platform/shrine, well, walls, and terraces.	Traditional Hawaiian and Historic
50-80-03-5926	Walls, well, alignment, upright slabs, and petroglyph.	Traditional Hawaiian and Historic
50-80-03-5927	Walls, alignment, and enclosure.	Historic
50-80-03-5929	Military bunker, gun emplacement, platform, and associated military debris.	Historic
50-80-03-5930	Platforms.	Undetermined
50-80-03-5931	Wall.	Undetermined
50-80-03-5932	Trail or road.	Undetermined
50-80-03-6527*	C-shape.	Undetermined
50-80-03-9525	Wall.	Historic
50-80-03-9533	Terrace.	Historic
Building 100	Communications building.	Historic
DPW-033	Terrace remnant.	Undetermined

\* Located outside of State-owned land but within the 100-foot buffer for the ROI.



**Figure 25. C-shaped enclosure (Feature 94) at Site -5775, from Zulick and Cox (2001b:148).**

Surface artifacts and ecofacts noted within MMR in association with Traditional Hawaiian site complexes include ground and flaked stone objects, waterworn pebbles (possible 'ili'ili stones), marine shell and coral fragments, 'ulu maika, petroglyphs on boulders, and metal/shrapnel fragments. Archaeological excavations of subsurface midden deposits and thermal features (e.g., Sites 4543, 4344, and 4546) within the ROI for MMR have recovered faunal bone, marine shell, basalt and volcanic glass artifacts and lithic debitage, wood charcoal, and coral manuports (Williams et al. 2001:33–42). While several features within sites at MMR have been recorded as possible (unconfirmed) human burials (Cleghorn et al. 2002:35), disarticulated human remains were observed on the surface of one site (Site 5775, Feature 56, terrace), which is located within the ROI for MMR. These remains were preserved *in situ* after “the remains were covered with a piece of plain brown paper and left in place” (Cleghorn et al. 2002:43).

Historic Period cultural resources (Sites 4541, 5927, 9525, and 9533) within or partially within the ROI for MMR are associated with 19th and early-20th centuries ranching and agricultural activities and the delineation of property boundaries (e.g., LCA boundary walls), along with more recent historic military-associated training activities. Further, some historic features (i.e., long wall segments) were likely constructed from basalt boulders that were quarried from abandoned Traditional Hawaiian structures (Cleghorn et al. 2002:127).

Two more recently constructed Historic Period cultural resources are located within the ROI for MMR, including Site 5929, an early-20th century coastal gun emplacement and concrete bunker with an associated military debris scatter (Figure 26). Zulick and Cox (2001b:157) suggest Site 5929 may be considered as a contributing property in the Artillery District of Honolulu (SIHP Site 50-80-13-1382). The former “Makua Sub Cable Site” is a concrete communications building built in 1966 (Building 100), which served as the terminus for an undersea communications cable linking Johnson Atoll with U.S. Air Force facilities throughout Hawai‘i (Cleghorn et al. 2002:125).

Additionally, historic and cultural resources with undetermined ages are present within or partially within the ROI for MMR (Sites 5734, 5930 to 5932, 6527, and DPW-033) that comprise an enclosure, a well, an alignment, walls, platforms, a trail, and a terrace remnant.



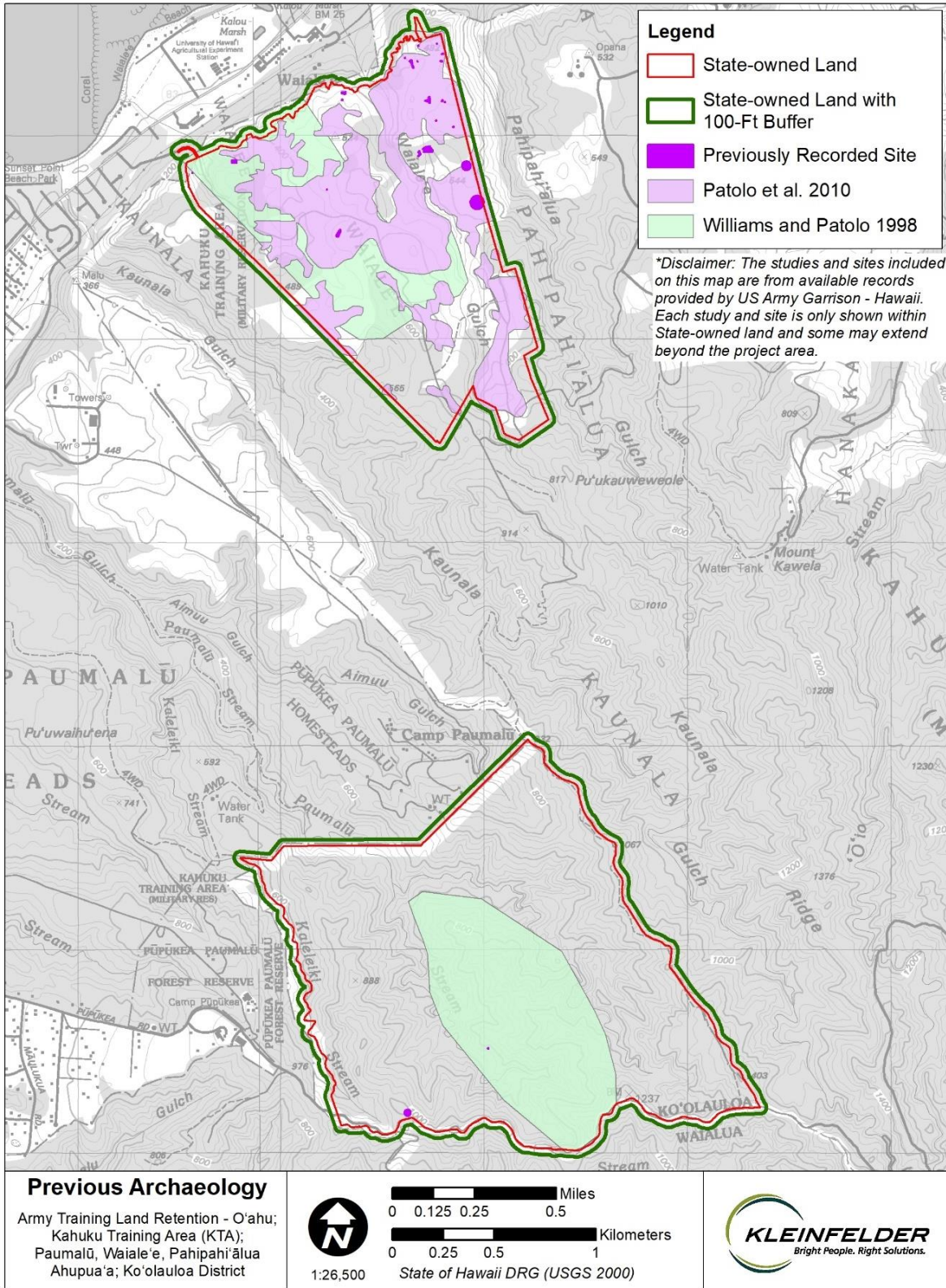
**Figure 26. Military coastal gun emplacement (Feature 2) at Site -5929, from Zulick and Cox (2001b:158).**

### 3.2 PREVIOUS CULTURAL RESOURCE STUDIES AT KTA

Cultural resource surveys in the ROI for KTA began in the early 1980s (Davis 1981). Of the approximately 1,268 acres that comprise the ROI for KTA, approximately 596 acres have been subjected to intensive cultural resource surveys. The remaining approximately 672 acres are unsurveyed or were previously subjected to studies at a reconnaissance level that do not meet the Army's current standards and so are not counted toward the current assessment. Two cultural resource surveys have been conducted that include portions of the ROI for KTA: Williams and Patolo (1998) and Patolo et al. (2010). The paragraphs below summarize these previous investigations (Figure 27; Table 4).

Williams and Patolo (1998) conducted a cultural resource investigation (see Figure 27) that included portions of both parcels that comprise the ROI for KTA. Fourteen cultural resources were recorded during that study, including Traditional Hawaiian and Historic Period archaeological sites, and sites and features of undetermined age. Of the 14 sites identified during the survey, two sites (SIHP Sites 50-80-02-4887 and -4888) are located within the ROI for KTA (see Section 3.2.1). Williams and Patolo (1998:64) recorded a Traditional Hawaiian residential site complex (Site -4887) on the Kaunala/Waiale'e Ridge in the northwestern portion of the northern (Tract A-1) parcel. The site complex consists of 11 features, including one enclosure, one C-shape, two circular alignments, one linear alignment, five terraces, and one depression (Williams and Patolo 1998:71). Site -4888 was recorded by Williams and Patolo (1998:73–74) as a series of earthen depressions, the largest containing charcoal and possibly representing an imu (earth oven), located on a knoll within Paumalū Stream in the southern parcel (Tract A-3) of the ROI for KTA. Other smaller depressions at Site -4888 were suspected to have resulted from agricultural activities. While radiocarbon dating was not conducted on sites within the ROI for KTA, subsurface testing of an imu at SIHP Site 50-80-02-4884, located approximately 1.3 kilometers (0.85 mile) to the east of the ROI for KTA, resulted in the collection of a charred tuber (*Ipomoea batatas*) and wood charcoal (*Acacia koa*). The samples were submitted for radiocarbon dating which produced calibrated date ranges of AD 1490 to 1680 and 1770 to 1800 (Williams and Patolo 1998:60).

Patolo et al. (2010) conducted an archaeological survey with limited subsurface testing (see Figure 27), that included portions of the northern parcel (Tract A-1) of the ROI for KTA. Thirty-two newly identified sites were recorded during that study, including 14 Historic Period sites (SIHP Sites 50-80-02-6969 to -6972 and -6975 to -6984) within the ROI for KTA (see Section 3.2.1), which are mainly comprised of military-associated features including mounds, foxholes, terraces, a concrete bunker, a gun emplacement, and a survey marker (Patolo et al. 2010:20–22). While the study did not conduct radiocarbon dating from sites within the ROI for KTA, calibrated dates ranging from 230 to 700 years before present were obtained from four other sites within KTA that were investigated during that study (Patolo et al. 2010:Appendix B).



**Figure 27. Previously conducted cultural resource studies and historic and cultural resources within the ROI for KTA.**

**Table 4. Previous Cultural Resource Studies Conducted within the ROI for KTA\***

TITLE	REFERENCE	STUDY TYPE	SUMMARY OF FINDINGS
Final Report Archaeological Inventory Survey of the Kahuku Training Area, for the Legacy Resource Management Program, O’ahu Island, Hawai’i	Williams and Patolo 1998	Archaeological reconnaissance survey with subsurface testing	Fourteen new sites (Sites 4876 to 4888 and 4930) identified. Two (Sites 4887 and 4888) within the current study area.
Phase I Archaeological Survey with Limited Subsurface Testing in Support of Designated “GO” Areas for Stryker Manuever in the U.S. Army Kahuku Training Area, Ahupua’a of Waimea, Pupukea, Kaunala, Waiale’e, Pahipahi’alua, ‘Opana, Kawela, Hanakaoe, ‘O’io, ‘Ulupehupehu, Paumalu, Kahuku, Keana, Malekahana, La’ie, and Kaipapa’u, Ko’olauloa District, Island of O’ahu, Hawai’i [TMK (1) 5-6, 5-7, 5-8 and 5-9: Various]	Patolo et al. 2010	Archaeological reconnaissance survey with subsurface testing	Thirty-two new sites (Sites 4599, 6537, 6969 to 6984, 6993, 6994, 6998, 7015 to 7019, 7022, 7023, 7026, 7028, and 7029) identified. 14 (Sites 6969 to 6972 and 6975 to 6984) within the current study area.

\*Studies not approved for use by USAG-HI are not included.

### 3.2.1 Identified Historic and Cultural Resources Within the ROI for KTA

According to GIS data provided by USAG-HI, 22 historic and cultural resources are located within or partially within the surveyed portions of the ROI for KTA (Table 5; see Figure 27). These sites include one Traditional Hawaiian habitation complex (Site -4887) and 20 historic-period/modern sites, and one site of undetermined period, mainly composed of military-associated features, including mounds, foxholes, and terraces, along with a bunker, a gun emplacement, and a survey marker.

One Traditional Hawaiian habitation site (Site 4887) is located within the ROI for KTA, although others are recorded within the larger KTA. The surface features (n=11) at Site 4887 are constructed of stacked basalt boulders which form terraces and alignments, along with an enclosure and a C-shape, that would have been used as dwellings, activity areas, and possibly an animal pen; an earthen depression interpreted as a possible imu was also recorded (Williams and Patolo 1998:72–73). Site 4888 contains possible agricultural features including earthen depressions, a boulder alignment, and another possible imu; the site area was noted to be impacted by extensive erosion and weathering (Williams and Patolo 1998:74). Isolated Traditional Hawaiian artifacts have also been documented within the ROI during the recording of Historic Period sites, including a basalt adze fragment near Site 6972 and a basalt flake at Site 6981 (Patolo et al. 2010:138).

**Table 5. Historic and Cultural Resources within the ROI for KTA**

SITE NUMBER	DESCRIPTION	PERIOD
50-80-02-4887	Habitation complex with enclosure, mounds, possible walls, and platform.	Traditional Hawaiian
50-80-02-4888	Depressions.	Undetermined
50-80-02-5689	Underground bunker.	Historic
50-80-02-6440	Concrete pit.	Historic
50-80-02-6676	Foxholes and blinds.	Historic/Modern
50-80-02-6677*	Mounds and alignments.	Historic
50-80-02-6969	Terrace and gun emplacement.	Historic/Modern
50-80-02-6970	Foxholes and military debris.	Historic/Modern
50-80-02-6971	Rock concentration, mounds, and military debris.	Historic/Modern
50-80-02-6972	Terrace and mounds.	Historic/Modern
50-80-02-6975	Mounds and military debris.	Historic/Modern
50-80-02-6976	Enclosure.	Historic/Modern
50-80-02-6977	Platform, terrace, enclosure, foxhole, and military debris.	Historic/Modern
50-80-02-6978	Terrace.	Historic
50-80-02-6979	Terrace, walls, mounds, foxholes, and military debris.	Historic
50-80-02-6980	Terrace.	Historic
50-80-02-6981	Mound and isolated basalt flake.	Historic
50-80-02-6982	Rock concentration and alignment.	Historic
50-80-02-6983	Rock lined foxhole.	Historic/Modern
50-80-02-6984	Wall, modified outcrop, mound, and C-shape.	Historic/Modern
SCS-KTA-TS-74	Mounds, modified outcrop, fence posts, and military debris.	Historic
SCS-KTA-TS-142	Survey marker, pit feature, and military debris.	Historic

\* Partially located within State-owned land.

Historic archaeological sites (Sites 5689, 6440, 6676, 6677, 6969 to 6972, 6975 to 6984; and SCS-KTA-TS-74 and 142) within the ROI for KTA are largely associated with pre-World War II and later military use of the area. These sites are generally comprised of hastily constructed stacked rock and pit features (e.g., mounds, foxholes, and terraces) associated with training activities, along with more formal defensive positions and gun emplacements constructed with concrete elements (Patolo et al. 2010:20–22). None of

the historic resources located on ROI for KTA have been subjected to evaluations of eligibility for the NRHP.

### **3.3 PREVIOUS CULTURAL RESOURCE STUDIES AND RESOURCES AT POAMOHO**

Due to its rugged environment and the low occurrence of non-aviation training activities (and resulting lack of compliance needs), no cultural resource investigations have been conducted within the ROI for Poamoho, and to date, no historic or cultural resources have been identified.



## 4 RECORDED IMPACTS ON HISTORIC AND CULTURAL RESOURCES

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Previous cultural resources studies have recorded various impacts on the general landscape within the State-owned lands at MMR and KTA, which include impacts from the past. Additionally, 5,248 acres of the total 6,322 acres of the State-owned lands have not been surveyed; thus, the presence of historic and cultural resources as well as previous impacts to those resources are unknown for these areas. Analysis of past and current impacts can be found within Section 3.4.5 of the O’ahu ATR EIS.

### 4.1 PAST IMPACTS WITHIN THE ROI FOR MMR

Past impacts on historic and cultural resources within the ROI for MMR are presented below.

Adverse impacts on historic and cultural resources associated with past military activities within the State-owned land at MMR are largely associated with physical impacts from live-fire training (which ceased in 2004) and other military actions, such as road construction, firefighting, and removal and/or detonation of UXO. Adverse impacts from past actions are recorded at five sites within the State-owned land, as described below.

Cleghorn et al. (2002:33–45) describes physical impacts from military actions at Site -5775, a multi-component site comprising 73 individual features. Zulick and Cox [2001b:124–151] subsequently documented 50 additional features at the site associated with Traditional Hawaiian and historical habitation, agricultural, and possible interment activities. According to the authors, the site, “has been impacted from U.S. military training activities (i.e., live fire and ground maneuvers), and maintenance of the military range, such as road building and firefighting. These impacts are evidenced by bulldozer, or tank, tracks through the center of the site, numerous pits and rock shatter from detonations of munitions, and bulldozed gaps in the site’s walls” (Cleghorn et al. 2002:33). Zulick and Cox (2001b:128,132) documented a 60-meter-long break in Feature 74 (wall) due to bulldozer disturbance (Feature 74 was recorded as part of Site -5775 but is actually within the current site boundary of Site -5777 and situated wholly within the ROI). Similar bulldozer damage was recorded at Feature 90, located partially within the ROI (Zulick and Cox 2001b:140).

Cleghorn et al. (2002:45) also detailed impacts “by live fire activities associated with U.S. military use of the Mākua Range” at Site -5776, a large multi-component site comprised of Traditional Hawaiian habitation features, possible burial markers, drainage barriers, historic cattle walls, and a possible historic road. This site, comprising 116 features, is located partially in State-owned land (the remaining, and larger, extent of the site is in Army-owned land). Cleghorn et al. (2002:45) note occurrences of impact craters within the site area as well as exploded and unexploded ordnance.

Zulick and Cox (2001b:61) recorded adverse physical impacts from small arms on Feature 2 at Site -4546, a probable historic animal exclusion wall. The authors noted, “boulders of the wall show considerable bullet damage to their surfaces.” Site -4546 is located partially within the ROI, and Feature 2 is situated outside the ROI.

Military construction of roadways within State-owned land have also resulted in adverse impacts on historic and cultural resources. Cleghorn et al. (2002:43) noted Feature 56 at Site -5775, the multi-component site mentioned above, as having been partially destroyed by construction of a bulldozed road on the north side of the feature. Boulder rubble and disarticulated human skeletal remains were also noted near and on the surface of the feature’s rock terrace. Eblé et al. (1995:7-22) and Zulick and Cox (2001b:36) reported impacts on another site: Site -4541, a complex of rock walls likely representing the historic property boundary for LCA 9901:1, which straddles both State-owned and Army-owned land. Physical destruction was noted at Feature 2, situated along the boundary of the ROI, involving “a ten-meter long cut or break in the middle of the wall...made during construction of the cross-valley ‘flash pan’ road” (Zulick and Cox (2001b:36).

In addition to specific impacts from live-fire training and road construction, general adverse impacts from past land use are recorded at the Ukanipō Heiau Complex (Site -0181). These impacts include human induced actions, such as ranching, military training, wildfires caused by military training, and site visitations, in addition to naturally induced factors, including invasive vegetation, erosion, and feral animals, all of which are often associated with human actions (Cleghorn et al. 2002:61-62, Appendix F). Cleghorn et al. (2002:125) further suggested that the construction of Building 100 in 1966 in the vicinity of Ukanipō Heiau diminished the heiau’s integrity by introducing visual impacts that affect the setting, feeling, and association of the Traditional Hawaiian ceremonial site.

Impacts from fires can paradoxically be both adverse and beneficial. Adverse physical impacts from an uncontrolled fire in the late 1990s were posited to include “thermal alteration of rock features, such as spalling; vegetation changes, including denuding of ground cover which may accelerate erosion and collapse of features; and introduction of charcoal...which may...contaminate culturally introduced radiocarbon samples important to site dating” (Eidsness and Cleghorn 2000:24–26, in Cleghorn et al. 2002:125). Conversely, beneficial impacts from fires associated with live-fire training and associated controlled burns to facilitate UXO identification have, in some cases, facilitated access to previously heavily vegetated cultural resources (Cleghorn 2002:62; Antone 2005) as well as made it easier and safer to remove UXO to permit safe access for cultural resource investigations and cultural practitioners (USAEC and USACE 2009:3-9, 3-51). Antone (2005) conducted a survey within a roughly 280-acre area that was burned following the ignition of a White Phosphorus round that had heated up and spontaneously ignited

(Kawelo 2005). Approximately 46 acres of the surveyed area included portions of the ROI for MMR, where new features were identified at several sites, and two new sites were recorded (see Section 3.1). Additionally, an 800-acre wildfire caused by a misfired mortar in 1998 was the impetus for providing access for much of the archaeological work conducted at Ukanipō Heiau (Eidsness and Cleghorn 2000; Cleghorn et al. 2002).

Extensive impacts associated with past landscape modification are recorded within the ROI for MMR. Subsurface investigations conducted by Lucking et al. (2007) and Exzabe and Davis (2015) demonstrated that the upper A and B soil horizons had been completely removed from areas within training objectives in the CCAAC, which extends into the eastern portion of the ROI (Lucking et al. 2007:33, Exzabe and Davis 2015:i). Both studies yielded no extant historic or cultural resources due to these large-scale disturbances. Only two of the 550 test excavations undertaken during the Lucking et al. (2007:i) study, for example, provided archaeological material, while all 83 shovel test probes excavated during the Exzabe and Davis (2015) study produced no evidence of subsurface archaeological features or intact cultural deposits (Exzabe and Davis 2015:i). These large-scale soil disturbances were determined to be related to “extensive and widespread bulldozing during range construction” (Lucking et al. 2007:6), and it cannot be determined if the extant sites directly adjacent to these studies’ project areas (e.g. Sites 4541, 4543, 4544, 4545, 4546, 5926, 9525, and DPW-033) were impacted, or if unrecorded sites or features related to existing sites where the soil columns were truncated had been destroyed.

No other impacts from past activities are recorded for specific cultural resources within State-owned land.

#### **4.2 PAST IMPACTS WITHIN THE ROI FOR KTA**

Past impacts to historic and cultural resources within the ROI for KTA are presented below.

Adverse impacts from past activities at KTA are documented in two cultural resource studies. Patolo et al. (2010:13) and Williams and Patolo (1998:78) noted historical land alterations throughout their survey areas, both of which overlap portions of the ROI. These land alterations, observed particularly in the lower elevations of the broader KTA area, which may include portions of the ROI, indicated to the authors of those studies that large areas may have been graded in the late nineteenth and early twentieth centuries for commercial ranching or possibly industrial sugar cane cultivation. Many of these graded areas were later used during subsequent military activities. It is unclear, however, if the impacts mentioned by these two studies occurred within the ROI. While ranching did occur in the ROI (see Section 2.2.5), it is unclear if it resulted in large-scale grading. It seems likely that extensive grading is more characteristic of the eastern portions of KTA, outside the State-owned land, since sugar cane plantations, requiring relatively level fields, are known to have occurred outside the ROI (see Section 2.2.5.1). Erosion and exposure of badland complexes (dissected landscapes with sparse soil cover and vegetation) is more widely extant

than prior grading within the ROI and may have resulted in impacts over time to the preservation of subsurface historic and cultural resources. The construction of military- and motocross access roads throughout KTA, which traverse onto the State-owned land, would have had the potential to impact historic and cultural resources as well, but no impacts on specific resources related to these activities are known.

These general landscape alterations may have broadly impacted the preservation of historic and cultural resources over time. The only adverse impact recorded for a specific historic/cultural resource within the State-owned land is attributed to historical land modification on a terrace and mound complex (Site 6972) associated with historic military construction (Patolo et al. 2010:30-31,144). Each feature of this site, however, was assessed to be in fair to good condition, suggesting that impacts were minor to negligible (Patolo et al. 2010:30).

No other impacts from past activities are recorded within the previous cultural resource studies approved for use by USAG-HI for specific cultural resources within the ROI for KTA.

In addition to adverse impacts, no significant beneficial impacts from past activities are known to have occurred within State-owned land.

#### **4.3 PAST IMPACTS WITHIN THE ROI FOR POAMOHO**

No cultural resource investigations have been conducted within the ROI for Poamoho, and to date, no historic or cultural resources have been identified. Past impacts to historic and cultural resources, if present within the ROI for Poamoho, are unknown.

## 5 SUMMARY AND CONCLUSION

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This document presented a literature review of previous cultural resource studies and recorded historic and cultural resources to support the preparation of an EIS that analyzes the environmental effects of a Proposed Action for the O‘ahu ATR EIS project at MMR, KTA, and Poamoho. The current document is meant to support the NEPA review process by compiling background information on existing conditions of historic and cultural resources known to exist within the ROI. This literature review will be used to generate an understanding of the current conditions and recorded impacts to historic and cultural resources within the ROI, which facilitate the analysis of environmental consequences provided in the EIS. The results of this analysis help to generate a preliminary assessment of the project’s potential impacts on historic and 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.

Forty-six (46) historic and cultural resources are recorded within or partially within the ROI, comprising a range of Traditional Hawaiian and Historic Period archaeological sites, structures, and features. To date, approximately 19 percent (1,277 acres) of the ROI has been subjected to archeological inventory survey, consisting of 13 separate investigations. Although other cultural resource projects have been conducted within the ROI, these 13 studies meet USAG-HI’s standards for archaeological investigations, and so are counted as surveyed and inventoried land. Approximately 81 percent (5,556 acres) of the ROI has either remained unsurveyed or was subjected to studies that do not meet the USAG-HI’s current standards.

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# Regulatory Framework

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## Appendix J

# REGULATORY FRAMEWORK

This appendix provides descriptions of major laws, regulations, EOs, standards and plans identified in the Regulatory Framework subsection of each of the resource areas analyzed in **Chapter 3** of the EIS. This appendix also elaborates on other relevant policies, agreements, guidance, standards, rules, and regulations which inform the analysis for the various resource areas. The subsection numbers and titles in the headers below correspond to the resource areas in **Chapter 3**.

### 3.2 Land Use

Federal and State policies and regulations, along with county-level guidance and zoning, create the regulatory framework for land use. Land owned by the U.S. Government is regulated under Federal law. Under the supremacy clause in the U.S. Constitution (Clause 2, Article VI), Federal land is not subject to State or County regulation. For land that is owned by the U.S. Government, the F-1 military zoning district and Federal use map designation is used by the City and County of Honolulu to indicate Federal jurisdiction per the county zoning code (i.e., Land Use Ordinance) and does not provide any land use or development standards.

The U.S. Government's authority to acquire real property interests includes, but is not limited to, 10 United States Code (U.S.C.) Section 2661, *Miscellaneous Administrative Provisions Relating to Real Property*; 10 U.S.C. Section 2663, *Land Acquisition Authorities*; and 10 U.S.C. Section 2802, *Military Construction Projects*. **Section 4.3** discusses the Proposed Action's consistency with relevant sections of Title 10 U.S.C., *Armed Forces*.

The Sikes Act (16 U.S.C. Section 670a–670o), as amended, requires that Integrated Natural Resources Management Plans (INRMPs) for Department of Defense (DoD) installations reflect mutual agreements with Federal and State agencies [e.g., U.S. Fish and Wildlife Service (USFWS)] for conservation, protection, and management of fish and wildlife resources, including recreational hunting (see **Section 3.3**). The Sikes Act notes that land uses are subject to military security and safety requirements, while allowing compatible public access to military installations that do not interfere with military training or operations. Department of Defense Instruction (DoDI) 4715.03, *Natural Resources Conservation Program*, establishes "The principal purpose of DoD lands and waters is to support mission-related activities. Those lands and waters shall be made available to the public for educational or recreational use of natural and cultural resources when such access is compatible with military mission activities, ecosystem sustainability, and other considerations such as security, safety, and fiscal soundness. Opportunities for such access shall be equitably and impartially allocated" (DoD, 2022). Recreational uses at KTA, Poamoho, and MMR are discussed under Recreation in **Section 3.2.5**.

Executive Order (EO) 11166, *Setting Aside for the Use of the United States Certain Public Lands and Other Property Located at the Makua Military Reservation, Hawaii*, signed by President Lyndon B. Johnson in

1964, establishes in fee simple the U.S. Government-controlled portion of MMR, including access rights to these lands to and from the nearest highway in, upon, and across adjoining properties. The land designated for U.S. Government use through this order are distinct from State-owned land at MMR and not subject to that lease.

Hawai'i has a unique system of classifying and managing lands in which both State and county agencies hold distinct responsibilities. The State Land Use Law is established through HRS Chapter 205, *Land Use Commission*, and describes the framework of land use management and regulation in which all lands in the State are classified into one of four land use districts. Hawai'i land use is guided by the State Land Use District (SLUD) classification and county Land Use Ordinance zoning designation. Real property is classified as urban, rural, agricultural, or conservation SLUD, and classified within the City and County of Honolulu's 26 zoning districts. The State framework for land use management was adopted by the State Legislature in 1961. Laws specific to the conservation district (HRS Chapter 183C) were established and went into effect in 1964; the relevance to KTA, Poamoho, and MMR is discussed under Land Tenure in **Section 3.2.5**.

Land use of public lands in Hawai'i is also guided by 5(f) of the Admission Act; Article 12, Section 4 of the Hawai'i Constitution ("the lands granted to the State of Hawaii by Section 5(b) of the Admission Act . . . shall be held as a public trust for native Hawaiians and the general public"), case law, and HRS 171-18. HRS 171-18 states that all proceeds and income from the sale, lease, or other disposition of these lands "shall be held 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 a widespread basis as possible, for the making of public improvements, and for the provisions of lands for public use" (HRS 171-18).

The 1959 Admission Act (Public Law 86-3, 73 Statute 4) created a compact with the United States and was duly approved by the majority of the voters of Hawai'i to admit Hawai'i into the United States.

Land under Section 5(f) of the Admission Act is defined as follows:

*The lands granted to the State of Hawai'i 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 homeownership 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.*

### 3.3 Biological Resources

Regulations are enacted to protect biological resources by preventing or limiting activities that may harm or reduce species populations. The Army is committed to environmental stewardship and protection, and adheres to regulations including, but not limited to, DoDI 4715.03, Natural Resources Conservation Program; and Army Regulation (AR) 200-1, *Environmental Protection and Enhancement*.

The Endangered Species Act of 1973 (ESA) (16 U.S.C. Section 1531 et seq.) is a Federal law to protect and recover imperiled species and the ecosystems they need to survive and recover. The ESA requires Federal agencies, in consultation with USFWS and the National Marine Fisheries Service (NMFS), to ensure that actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of any listed species or result in the destruction or adverse modification of designated critical habitat of such species. Under the ESA, jeopardy occurs when an action is reasonably expected, directly or indirectly, to diminish numbers, reproduction, or distribution of a species so that the likelihood of survival and recovery in the wild is appreciably reduced. An endangered species is defined by the ESA as any species in danger of extinction throughout all or a significant portion of its range. A threatened species is defined by the ESA as any species likely to become an endangered species in the foreseeable future. Unless authorized by USFWS or NMFS through a permit or incidental take statement, the ESA prohibits any action that causes a “take” of any listed species. Take is defined as “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct” (16 U.S.C. Section 1532). Harm can further be defined as an act that may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering. Listed plants are not protected from incidental take, but it is illegal to collect or maliciously harm them on Federal land. In accordance with 50 CFR Section 17.71 regarding prohibitions for endangered and threatened wildlife and plants, any species listed as threatened after September 26, 2019, has a different level of protection than endangered species because a 4(d) rule will be issued with the listing specifying actions that would not be prohibited under the act for that newly listed species.

USFWS designates critical habitat when it is determined that habitat is essential to the conservation of a threatened or endangered species. Federal agencies must ensure that their activities do not destroy or adversely modify designated critical habitat to the point that it will no longer support in the species’ recovery. Areas that are owned or controlled by DoD are exempt from a critical habitat designation if it is determined that a signed INRMP provides a benefit to the species; these plans are required under the Sikes Act.

The Sikes Act [16 U.S.C. Section 670a (a)(2)] authorizes the development of integrated installation plans (i.e., INRMP) and reflects mutual agreement of the parties concerning conservation, protection, and management of fish and wildlife resources. The Sikes Act is discussed in more depth in **Section 3.2.2**.

The Migratory Bird Treaty Act (MBTA) of 1918 (16 U.S.C. Sections 703–712) and EO 13186, *Responsibilities of Federal Agencies to Protect Migratory Birds*, require Federal agencies to minimize or avoid impacts on migratory birds. Under the MBTA, it shall be unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill; attempt to take, capture, or kill; or possess migratory birds or their nests or eggs at any time unless permitted by regulation. A Memorandum of Understanding (MOU) was executed in September 2014 between DoD and USFWS to promote the conservation of migratory birds. The MOU expired in 2019; however, 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). Section 315 of the

Bob Stump National Defense Authorization Act for Fiscal Year 2003 (Public Law 107-314, 116 Statute 2458) exempts military readiness activities carried out in accordance with 50 CFR Section 21.15 from the prohibition against the incidental taking of migratory birds. Military readiness activities, as defined in the Bob Stump National Defense Authorization Act and implementing regulations at 50 CFR Section 21.3, include all training and operations of the Armed Forces that relate to combat, and the adequate and realistic testing of military equipment, vehicles, weapons, and sensors for proper operation and suitability for combat use.

The Federal Noxious Weed Act (Public Law 93-629) mandates control of noxious weeds by limiting potential weed seed transport between infested and non-infested sites. EO 13112, *Invasive Species*, and EO 13751, *Safeguarding the Nation from the Impacts of Invasive Species*, require Federal agencies to prevent the introduction of invasive species; provide for their control; and minimize their economic, ecological, and human health impacts.

EO 11990, *Protection of Wetlands*, requires that Federal agencies take actions to minimize or avoid the destruction, loss, or degradation of wetlands and enhance and preserve the natural and beneficial values of wetlands.

The State provides protections for threatened species, endangered species, and species of concern under HAR Chapter 13-107, *Threatened and Endangered Plants*; HAR Chapter 13-124, *Indigenous Wildlife, Endangered and Threatened Wildlife, Injurious Wildlife, Introduced Wild Birds, and Introduced Wildlife*; and HRS Chapter 195D, *Conservation of Aquatic Life, Wildlife, and Land Plants*. These regulations work to conserve and protect native plants and animals and to manage non-native species. Additionally, HAR Chapter 13-122, *Rules Regulating Game Bird Hunting, Field Trials, and Commercial Shooting Preserves*, and HAR Chapter 13-123, *Rules Regulating Game Mammal Hunting*, provide hunting regulations.

### 3.4 Historic and Cultural Resources

Regulations are enacted to protect and prevent or limit activities that may cause adverse impacts on historic and cultural resources. The Army is committed to environmental stewardship and protection, and adheres to regulations including, but not limited to, DoDI 4715.16, *Cultural Resources Management*, and AR 200-1, *Environmental Protection and Enhancement* (see **Section 3.4.5** under Current Management Efforts for additional details on the Army’s avoidance measures for historic and cultural resources).

The NHPA of 1966, as amended (54 U.S.C. Section 300101 *et seq.*), establishes the national policy for the preservation of historic properties. The regulations at 36 CFR Part 800 implement Section 106 of the NHPA (54 U.S.C. Section 306108). The regulations detail a process by which Federal agencies consider the potential effects of their undertakings on historic properties and afford the Advisory Council on Historic Preservation (ACHP), State Historic Preservation Officers (SHPOs), and other consulting parties the opportunity to comment.

Potential effects on historic properties resulting from ongoing activities on State-owned land have been considered through various Section 106 consultations. For example, ongoing activities within the KTA and Poamoho portions of the ROI are subject to provisions of the 2018 Final Programmatic Agreement among the U.S. Army Garrison, Hawaii, the Hawaii State Historic Preservation Officer, and the Advisory Council Regarding Routine Military Training Actions and Related Activities at United States Army Training Areas and Ranges on the Island of O‘ahu, Hawai‘i (2018 Section 106 PA) (USAG-HI, 2018a). The 2018 Section 106



PA contains stipulations that satisfy the Army’s Section 106 compliance responsibilities for ongoing military activities on State-owned land at KTA and Poamoho. Undertakings related to ongoing use of State-owned land at MMR have been considered through the Section 106 process and are implemented through 10 documents, which have resulted in a finding of no adverse effects (see **Section 3.4.5** under Current Management Efforts for details on the Army’s avoidance measures). These documents include the following:

- A PA (USAG-HI, 2009a) for routine military training at MMR that was executed in 2009 and expired in 2014
- A PA for Traditional Hawaiian use of Ukanipō Heiau
- A Memorandum of Agreement (MOA) (USAG-HI, 2015b) currently in place and expiring in September 2025 that addresses vegetation management and the potential impacts on historic properties, specifically petroglyphs, at MMR
- Seven separate Section 106 consultation documents regarding potential adverse effects on historic properties from intelligence training, blank-fire maneuver training, bivouac training, non-live-fire aviation training, vegetation management away from petroglyphs, facility management, road maintenance, and the associated measures to avoid effects on historic properties

The Army is also required to comply with NAGPRA, which provides a process for Federal agencies to address discoveries of human remains and to repatriate certain cultural items to Indian tribes, Alaska Native Corporations, and Native Hawaiian Organizations (NHOs). It is Army policy to leave burials in place and undisturbed whenever possible. Inadvertent discoveries of NAGPRA cultural items are protected from additional disturbance, and all Army actions are conducted in accordance with the implementing regulations of NAGPRA at 43 CFR Section 10.4.

### **3.5 Cultural Practices**

See **Section 3.5.2**.

### **3.6 Hazardous Substances and Hazardous Wastes**

Regulations are enacted to manage hazardous substances and petroleum products, and streamline waste management. The Army is committed to environmental stewardship and protection, and adheres to the regulations pertinent to KTA, Poamoho, and MMR for potential impacts as follows:

CERCLA (42 U.S.C. Section 9601 *et seq.*), as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986, regulates the cleanup of uncontrolled or abandoned hazardous waste sites, accidents, spills, and other emergency releases of pollutants and contaminants into the environment. CERCLA also assigns liability to the parties responsible for any release and assures their cooperation in the cleanup. SARA reauthorizes CERCLA to continue cleanup activities around the country. CERCLA provides the framework and guidance for Federal facilities to identify and cleanup contaminated property and plays a substantial role in the transfer of DoD sites.

The State provides regulations for handling hazardous waste under HRS Chapter 342J, along with related implementing rules. The hazardous waste program of the State is preventative, supporting education about hazardous waste and its reduction and recycling, as well as regulatory guidance.

CERCLA regulations are found within the National Oil and Hazardous Substances Pollution Contingency Plan (National Contingency Plan; 40 CFR Part 300), which applies to cleanup response actions taken pursuant to CERCLA and hazardous substances spill prevention under Section 311 of the CWA, as amended. The National Contingency Plan provides the organizational structure and procedures for preparing for and responding to discharges of oil and releases of hazardous substances, pollutants, and contaminants.

HRS Section 128D-7, State Contingency Plan, ensures that the State complies with the National Contingency Plan. The Oil Pollution Prevention Regulation, 40 CFR Section 112, addresses specific requirements and provisions for the preparation of Spill Prevention, Control, and Countermeasure (SPCC) Plans. The response actions as described in the U.S. Army Corps of Engineers (USACE) SPCC Plan and the USAG-HI SPCC Plan, which applies to Federal military installations in Hawai'i, are applicable to the State-owned lands and are considered appropriate and reasonable for effective response actions (USAG-HI, 2012).

Title III of SARA authorized the Emergency Planning and Community Right-to-Know Act (42 U.S.C. Section 11001 *et seq.*). This act was designed to help local communities protect public health, safety, and the environment from chemical hazards.

The Pollution Prevention Act (42 U.S.C. Section 13101 *et seq.*) is a national policy to reduce or eliminate waste generation at the source whenever feasible.

RCRA (42 U.S.C. Section 6901 *et seq.*) gives USEPA the authority to control hazardous waste from cradle to grave. Subtitle C of RCRA establishes guidelines for the generation, transportation, treatment, storage, and disposal of hazardous wastes. Subtitle I of RCRA governs the storage of materials in underground storage tanks (UST), including the storage of unused products (including gasoline) and wastes. The State is authorized to implement Corrective Action Programs under RCRA. RCRA Section 3006 and Section 9004 allow the state to be authorized to administer RCRA hazardous waste programs and the UST program.

The TSCA (15 U.S.C. Section 2601 *et seq.*) provides USEPA with authority to implement reporting, record keeping, and testing requirements, and restrictions relating to chemical substances and/or mixtures. The TSCA (40 CFR Parts 700–799) gives USEPA comprehensive authority to regulate any chemical substance whose manufacturing, processing, distribution in commerce, use, or disposal may present an unreasonable risk of injury to health or the environment. Federal facilities are affected by regulations under the TSCA because the regulations address the handling and disposal of substances regulated under the TSCA and the remediation of asbestos and radon.

State regulations for the management of asbestos-containing material (ACM) and lead-based paint (LBP) are codified in HRS Chapter 342P, which establishes rules to control and prohibit asbestos pollution and LBP hazards, and regulates asbestos and lead abatement for the State. The USAG-HI Asbestos Management Plan and Lead Hazard Management Plan establish Army practices for assessments, abatement, and disposal of asbestos and lead, respectively (USAG-HI, 2001b; USAG-HI, 2001c).

EO 12088, *Federal Compliance with Pollution Control Standards*, requires all Federal agencies to comply with environmental laws and fully cooperate with USEPA, State, interstate, and local agencies to prevent, control, and abate environmental pollution.

The Hazardous Materials Transportation Act (49 U.S.C. Section 5101 *et seq.*) gives the Hawai'i Department of Transportation (HDOT) authority to regulate shipments of hazardous materials by air, sea, highway, or rail. The HDOT Hazardous Materials Program administers the regulations relating to transporting hazardous materials through areas under HDOT's control.

AR 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. Army Pamphlet 710-7, *Hazardous Material Management Program*, establishes the standard Army practices for the centralized control and management of hazardous substances. USAG-HI adheres to USAG-HI Regulation 200-4, *Installation Hazardous Waste Management Plan* (IHWMP; USAG-HI, 2018c), which provides plans and procedures for handling, storing, and disposal of hazardous substances and hazardous wastes on USAG-HI installations and training areas.

Army Pamphlet 385-24, *The Army Radiation Safety Program*, implements AR 385-10, *The Army Safety Program*, which prescribes radiation safety policies, requires Army organizations to develop management and quality control processes to control and mitigate radiation hazards associated with Army activities and equipment, and ensures that exposure to ionizing radiation is kept as low as reasonably possible.

HRS Chapter 342L, *Underground Storage Tanks*, and its implementing rules in HAR Chapter 11-280.1, *Underground Storage Tanks*, regulate compliance with USTs containing petroleum or other substances identified by the Hawai'i State Department of Health (DOH). The regulations govern inspection, compliance, record keeping, and maintenance of publicly available records for UST locations and any violations associated with permitted USTs.

The Defense Environmental Restoration Program was formally established by Congress in 1986 to provide for the cleanup of DoD property at active installations and formerly used defense sites throughout the United States and its territories. The two restoration programs under the Defense Environmental Restoration Program are the Installation Restoration Program and the Military Munitions Response Program (MMRP). The MMRP addresses potential risks associated with MEC on nonoperational ranges at current and former defense sites.

On February 12, 1997, USEPA promulgated the Military Munitions Rule, deciding not to impose the regulatory requirements of RCRA Subtitle C on operational military ranges. The Military Munitions Rule states that military munitions are not solid wastes under RCRA's Subtitle C regulations and consequently are not regulated as hazardous waste. If military munitions are used or fired, land off range, and are not promptly rendered safe or retrieved, then the munitions would be a solid waste and potentially subject to the corrective action authorities under RCRA Sections 3004(u), 3004(v), and 3008(h) or the imminent and substantial endangerment authorities of RCRA Section 7003. Operational ranges are defined at 10 U.S.C. Section 101(e)(3) as: A range that is under the jurisdiction, custody, or control of the Secretary of Defense and (1) that is used for range activities; or (2) although not currently being used for range activities, it is still considered by the Secretary of the DoD to be a range and has not been put to a new use that is incompatible with range activities. 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. As an operational range, the State-owned land is exempt from MEC cleanup under CERCLA (e.g., the Defense Environmental Restoration Program) per the Military Munitions Rule. Until lease expiration, or designation of certain areas of the State-owned land from the Secretary of Defense

as areas “other than operational ranges,” MEC cleanup on State-owned land will continue to be managed by SOPs for KTA, Poamoho, and MMR rather than CERCLA.

All training at KTA, Poamoho, and MMR, including the State-owned lands, adheres to procedures and requirements in USARHAW Regulation 350-19, *Installations Ranges and Training Areas*, AR 350-19, and the SOPs (USAG-HI, 2020a; USAG-HI, 2020b; USAG-HI, 2021e). In addition, training within the State-owned lands at KTA, Poamoho, and MMR adhere to the requirements of the leases (DLNR, 1964a; DLNR, 1964b; DLNR, 1964c; DA & DLNR, 2005).

### 3.7 Air Quality and Greenhouse Gases

Under the Clean Air Act, USEPA has established National Ambient Air Quality Standards (NAAQS) for several different air pollutants that are considered harmful to public health and the environment. These pollutants, referred to as criteria pollutants, are carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), nitrogen dioxide (NO<sub>2</sub>), ozone (O<sub>3</sub>), suspended particulate matter measured less than or equal to 10 microns in diameter (PM<sub>10</sub>) and less than or equal to 2.5 microns in diameter (PM<sub>2.5</sub>), and lead. CO, SO<sub>2</sub>, lead, and some particulates are emitted directly into the atmosphere from emission sources. O<sub>3</sub>, nitrogen dioxide, and some particulates are formed through atmospheric chemical reactions that are influenced by weather, ultraviolet light, and other atmospheric processes. Volatile organic compounds and nitrogen oxide emissions are used to represent O<sub>3</sub> generation because they are precursors to O<sub>3</sub>. Since the phase-out of leaded fuels in the 1970s and 1980s, lead emissions have been negligible from the types of emission sources under this Proposed Action. As such, they are not included in this air quality analysis.

The NAAQS protect against adverse health and welfare impacts. Areas that are and have historically been in compliance with the NAAQS or have not been evaluated for NAAQS compliance are designated as attainment areas, which is the designation for all of O‘ahu. Areas that do not meet the NAAQS are designated as nonattainment areas. Areas that have transitioned from nonattainment to attainment are designated as maintenance areas and are required to adhere to maintenance plans to ensure continued attainment until a 20-year period has lapsed and attainment is continued. The USEPA General Conformity Rule applies to Federal actions occurring in nonattainment or maintenance areas when the total direct and indirect emissions of nonattainment and maintenance pollutants (or their precursors) exceed specified thresholds. The General Conformity Rule does not apply in areas designated as attainment.

The Hawai‘i DOH, Clean Air Branch (CAB) also regulates and monitors air pollutants under HAR Chapter 11-59, Ambient Air Quality Standards, and HAR Chapter 11-60.1, Air Pollution Control. The CAB has established its own ambient air quality standards for criteria pollutants, and these standards are stricter than the NAAQS for CO and NO<sub>2</sub> (DOH-CAB, 2019). The CAB also has promulgated an additional air quality standard for hydrogen sulfide. Additional Hawai‘i air pollution control laws are found in HRS Chapter 342B. Although not directly related to air quality, HRS Chapter 342C addresses O<sub>3</sub> layer protection, and Act 17 of Session Laws of Hawai‘i 2018 requires this EIS to consider sea level rise. The Hawai‘i greenhouse reduction plan cited in HAR Section 11-60.1-201 is not applicable to the State-owned lands on the O‘ahu training areas because it is for stationary sources that emit at least 100,000 tons per year of carbon dioxide equivalent emissions, whereas the State-owned lands do not have any such sources.

Army Directive 2020-08, *U.S. Army Installation Policy to Address Threats Caused by Changing Climate and Extreme Weather*, requires Army installations to assess, plan for, and adapt to the projected impacts of changing climate and extreme weather by adding the results of climate change prediction analysis tools

into all facility and infrastructure-related plans, policies, and procedures. The *Army Climate Resilience Handbook*, dated August 2020, instructs Army planners on the process to systematically assess climate exposure impact risk and to incorporate these findings into the planning process. The Army also has implemented an Army Climate Strategy and follows the DoD Climate Adaptation Plan (Army, 2022). The Army used the Army Climate Assessment Tool in this EIS, and now uses the DoD Climate Assessment Tool (DCAT), to identify potential climate change threats and to rank the relative risk each threat presents to a given Army installation in 2050 and 2085. The tools also include summaries of regional climate change impacts as developed by the U.S. Global Change Research Program.

This EIS addresses air quality impacts in accordance with EO 13990, *Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis*; the Army’s March 4, 2021, memorandum titled *Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in Army National Environmental Policy Act Reviews*; and CEQ’s January 2023 interim guidance titled *National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change*. This EIS qualitatively addresses direct and indirect GHG emissions from the Proposed Action, the social costs (i.e., dollar estimate of damage stemming from emissions), and the impacts of ongoing climate change on the Proposed Action. A quantitative, full life-cycle analysis of GHG emissions (i.e., carbon dioxide, methane, and nitrous oxide emissions from direct Army activities at KTA, Poamoho, and MMR as well as from indirect activities such as manufacturing and shipping equipment and materiel, and troop movements to and from these training areas) and their associated social costs has not been performed because there are no data inputs reasonably available to support such calculations for a real estate transaction such as the Proposed Action. No munitions with DU have ever been used on any of the installations under study in this EIS, and therefore no analysis of airborne DU is included.

### 3.8 Noise

The Noise Control Act of 1972 (42 U.S.C. Section 4901 *et seq.*) directs Federal agencies to comply with applicable Federal and State noise control regulations to the fullest extent consistent with agency missions. Other noise laws include the Aviation Safety and Noise Abatement Act, the Control and Abatement of Aircraft Noise, and the Sonic Boom Act.

In Hawai‘i, noise pollution regulations are found in HRS Chapter 342F. The Hawai‘i DOH Indoor and Radiological Health Branch regulates noise in accordance with HAR Chapter 11-46, Community Noise Control, which limits sound generated by new or expanded developments. It provides for the prevention, control, and reduction of noise pollution. HAR Section 11-46-3 defines maximum permissible sound levels for three classifications of land use (Class A, Class B, and Class C) by zoning district and provides for the reduction and control of excessive noise sources. **Table J-1** outlines the maximum sound level at the property boundary for permanent stationary sources according to land use. The Proposed Action does not involve introduction of, or modifications to, stationary sources; therefore, HAR Chapter 11-46 does not apply, so the table is provided for informational purposes only.

<b>Table J-1: Hawai’i Maximum Permissible Sound Levels</b>		
<b>Land Use<sup>1</sup></b>	<b>Maximum Permissible Sound Levels<sup>2</sup></b>	
	<b>Daytime dBA (7 a.m. – 10 p.m.)</b>	<b>Nighttime dBA (10 p.m. – 7 a.m.)</b>
Zone A: Residential, conservation, preservation, public space, or similar land use.	55	45
Zone B: Multi-family dwellings, business, commercial, hotel, resort, or similar use.	60	50
Zone C: Agriculture, county, industrial, or similar use.	70	70

1. For mixed zoning districts, the primary land use designation is used to determine the permissible sound level.
2. Sound limits for impulsive noise is 10 dBA above the maximum permissible sound levels shown.

See **Section 3.8.2** for DoD guidance informing noise abatement planning.

### 3.9 Geology, Topography, and Soils

AR 350-19 provides policy and guidance for managing and operating Army ranges and training lands to support their long-term viability. The Range Complex Master Plan’s ITAM Program has four major components: Range and Training Land Assessment, LRAM, Training Requirement Integration, and Sustainable Range Awareness. The LRAM component guides repairs, maintenance, and reconfiguration of Army lands to meet maneuver training requirements. It is the crucial enabler for sustaining realistic training conditions and supporting unit mission requirements. Data collected by the ITAM Program includes topographic features, soil characteristics, and surface disturbances, which are used to estimate soil erosion, ground cover, and disturbance and monitoring for the Land Restoration Program.

The Farmland Protection Policy Act (7 CFR Part 658) sets out criteria developed by the Secretary of Agriculture, in cooperation with other Federal agencies, pursuant to Section 1541(a) of the Farmland Protection Policy Act (7 U.S.C. Section 4202(a)). Federal agencies are to use the criteria (1) to identify and take into account the adverse effects of their programs on the preservation of farmland, (2) to consider alternative actions, as appropriate, that could lessen adverse effects, and (3) to ensure that their programs, to the extent practicable, are compatible with the State and units of local government and private programs and policies to protect farmland (7 CFR Section 658.1). The Farmland Protection Policy Act also provides guidelines to assist agencies in using the criteria.

HRS Chapter 205, Part III, Land Use Commission, establishes policy for Important Agricultural Lands in Hawai’i. Each county is to identify and map potential Important Agricultural Lands within its jurisdiction using a public involvement process. Landowner incentives, such as tax credits and loan guarantees, encourage the voluntary designation of lands as Important Agricultural Land when they meet specific criteria. The State Land Use Commission’s Important Agricultural Lands identified through the Commission’s declaratory ruling process do not include the State-owned land at KTA, Poamoho, and MMR (State LUC, 2022).

In accordance with 32 CFR Part 651, Environmental Analysis of Army Actions, and HRS Chapter 343, Environmental Impact Statements, consideration of geologic hazards associated with climate change, including sea level rise, are to be evaluated in an EIS based on the best available scientific data.

In addition, all training at KTA, Poamoho, and MMR, including on State-owned lands, adheres to procedures, requirements, and management measures outlined in USARHAW Regulation 350-19; AR 350-19; Dust and Soils Management and Monitoring Plan (KTA and MMR); Erosion Control Best Management Practices Program Plan; INRMP; SPCC Plan; Storm Water Management Plan; SOPs for KTA, Poamoho, and MMR; and the 1964 leases for the State-owned lands at KTA, Poamoho, and MMR. These regulations and procedures ensure the minimization of impacts on geological and soil resources during training activities.

### 3.10 Water Resources

AR 350-19, in coordination with the ITAM Program, provides policy and guidance for managing and operating Army ranges and training lands to support their long-term viability. The ITAM Program—along with the adoption and use of BMPs for riparian zones and other areas and specific watershed management projects—provides the mechanism for attaining watershed management goals by maintaining the integrity of stream courses, reducing the volume of surface runoff originating from disturbed areas and running directly into surface water, minimizing the movement of pollutants (e.g., nutrients) and sediment to surface water and groundwater, and stabilizing exposed mineral soil areas through natural or artificial revegetation means.

The Coastal Zone Management Act (CZMA) (16 U.S.C. Section 1451 *et seq.*) is the Federal law that protects the coastal environment from growing demands associated with residential, recreational, commercial, and industrial uses. CZMA provisions help states develop coastal management programs to manage and balance the coastal zone’s competing uses. In 1977, Hawai‘i established the Coastal Zone Management (CZM) Program with HRS Chapter 205A, which requires that Federal projects are reviewed for consistency with the Hawai‘i CZM Program. Under this program, all the State’s lands are considered subject to consistency review. The CZM objectives are to ensure effective management, beneficial use, protection, and development of the Hawai‘i coastal zone. **Section 4.3** analyzes the Proposed Action’s consistency with the CZMA and the State’s CZM law.

The Safe Drinking Water Act (SDWA) (42 U.S.C. Section 300f–300j *et seq.*) is the Federal law that protects public drinking water supplies throughout the United States. Under the SDWA, USEPA sets standards for drinking water quality. USEPA’s regulations implementing the SDWA requirements are found in 40 CFR Parts 141–149. Federal standards promulgated under the SDWA are also typically used to evaluate or assess groundwater quality. Any federally funded project with the potential to contaminate a designated sole-source aquifer is subject to review by USEPA. Federal SDWA Groundwater Protection Programs are generally implemented at the State level. In Hawai‘i, the Groundwater Protection Program is managed by the DOH Safe Drinking Water Branch (SDWB), which has prepared groundwater contamination maps for the State. The State level equivalent of the SDWA and National Primary Drinking Water Regulations is the HAR Chapter 11-20, Public Water Systems. This chapter sets the standards for the State Primary Drinking Water Regulations. This regulation also covers the monitoring, analytical requirements, inspections, exemptions, emergency provisions and notification requirements. **Section 3.10.5** describes existing conditions of groundwater and groundwater quality in the ROI.

The SDWB is responsible for safeguarding public health by protecting Hawai‘i’s drinking water sources (surface water and groundwater) from contamination and ensuring that owners and operators of public water systems provide safe drinking water to the community. The SDWB protects drinking water through the Underground Injection Control (UIC) Program, the Groundwater Protection Program, and the Source Water Assessment and Protection Program. The UIC Program (HAR Chapter 11-23, Underground Injection Control) serves to protect the quality of Hawai‘i’s underground sources of drinking water from chemical, physical, radioactive, and biological contamination that could originate from injection well activity. The Groundwater Protection Program safeguards groundwater quality and public health by protecting Hawai‘i’s groundwater from contamination by monitoring and assessing groundwater quality, identifying and prioritizing groundwater contamination threats, and mitigating priority contamination threats and preventing contamination. The SDWB provides information on DOH’s ongoing water quality work in a Water Quality Plan that establishes a framework for comprehensive water resources planning to address water quantity and quality issues in Hawai‘i.

The CWA (33 U.S.C. Section 1251–1387 *et seq.*) establishes Federal limits, through the National Pollutant Discharge Elimination System (NPDES) Program, on the amounts of specific pollutants that can be discharged into surface waters to restore and maintain the chemical, physical, and biological integrity of the water. The NPDES is a permit program that regulates where a point source discharges a pollutant to “waters of the United States”. The DOH administers the NPDES Program in Hawai‘i under HAR Chapter 11-55. HAR Chapter 11-54 regulations specify the water quality condition for “State waters,” as defined by HRS Section 342D-1, *Water Pollution*, including all waters (fresh, brackish, or salt) around and within the State, including but not limited to coastal waters, streams, rivers, drainage ditches, ponds, reservoirs, canals, groundwaters, and lakes; and HRS Chapter 342E, *Nonpoint Source Pollution Management and Control*. The purpose of HRS Chapter 342E is to reduce, control, and mitigate nonpoint source pollution in the State.

Section 404 of the CWA, *Water Quality Certifications*, authorizes the Secretary of the Army, acting through the Chief of Engineers, to issue permits for the discharge of dredge or fill into wetlands and other waters of the United States. Any discharge of dredge or fill into the waters of the United States requires a permit from USACE. Section 404 does not apply to the Proposed Action because there would be no alteration of stream channels and no pumping of groundwater within the State-owned lands.

Under Section 401 of the CWA, the DOH Clean Water Branch is responsible for issuing or denying Section 401 *Water Quality Certifications* for any project or activity that requires a Federal license or permit and may result in a water pollutant discharge to State surface waters.

The National Flood Insurance Act (42 U.S.C. Section 4001 *et seq.*) establishes the National Flood Insurance Program, a voluntary floodplain management program for communities that is implemented by FEMA. Any action within a FEMA-mapped floodplain in a participating community must follow the community’s FEMA-approved floodplain management regulations. EO 11988, *Floodplain Management*, requires Federal agencies to avoid, to the extent possible, the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development unless it is the only practicable alternative.

The National Wetlands Inventory (NWI) compiled by USFWS has identified and mapped most of the known wetlands in the continental United States, including those on military installations. DoDI 4715.3 states that installations shall ensure “no net loss” of wetlands. To manage wetlands properly, installations have



used the NWI and subsequent planning level surveys to determine the extent and location of wetlands across their installation. By identifying wetlands early in the NEPA process and using a “Go/No-Go” approach where avoidance is preferred to impacts, installations, including those in Hawai‘i, have the ability to avoid costly mitigation and potential delays in the implementation of a Proposed Action.

As described in **Section 3.9**, SOPs are also used in reviewing applications for USACE permits under Section 404 of the CWA by highlighting critical portions of the USACE implementing regulations to be used in reviewing permit applications. In addition, all training at KTA, Poamoho, and MMR, including on State-owned lands, adheres to procedures and requirements outlined in USARHAW Regulation 350-19; AR 350-19; Erosion Control Best Management Practices Program Plan; INRMP; SPCC Plan; Storm Water Management Plan; SOPs for KTA, Poamoho, and MMR; and the 1964 leases for the State-owned lands at KTA, Poamoho, and MMR. These regulations and procedures ensure the minimization of impacts on water resources during training activities.

The State Water Code (HRS Chapter 174C) was enacted into law by the 1987 State Legislature for the purpose of protecting Hawai‘i’s water resources. It provides for the legal basis and establishment of the State’s Commission on Water Resource Management (CWRM). CWRM administers the State Water Code, is the primary steward of water resources within Hawai‘i and has broad powers and responsibilities to protect and manage water resources. This includes the authority and duty to develop plans and programs to conserve and manage water use within the State’s aquifer sectors and systems in which water consumption approaches the aquifer’s sustainable yield.

### **3.11 Socioeconomics**

NEPA, the Army’s NEPA regulations, CEQ’s NEPA regulations, HRS Section 343, and HAR Chapter 11-200.1 require an approach for planning and decision-making that involves evaluation of actions that may have an impact on the human environment, including on social and economic resources. The CEQ NEPA regulations state that the “human environment...means comprehensively the natural and physical environment and the relationship of present and future generations with that environment” [40 CFR Section 1508.1(r)].

Analysis of planned actions under NEPA and HEPA must discuss and provide appropriate consideration to effects on the human environment, which include both natural and physical environments and the relationship on present and future generations of individuals within those environments [NEPA Section 102(2); 32 CFR Part 651, Appendix E (b)(7); 40 CFR Section 1502.16]. CEQ NEPA regulations state that when economic or social effects and natural or physical environmental effects are interrelated, the EIS discusses these effects on the human environment [40 CFR Section 1502.16(b)]. Regulations implementing HEPA also require the consideration of effects on economic and social welfare [HAR Section 11-200.1-13(b)(4)].

### 3.12 Environmental Justice

The Army implements environmental justice analysis requirements in accordance with NEPA, the following EOs listed in this section, and existing DoD and Army policies:

- EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* (February 11, 1994), rescinded by EO 14173, directed Federal agencies to identify and address the disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations.
- EO 13045, *Protection of Children from Environmental Health Risks and Safety Risks* (April 21, 1997), specifically indicates that environmental justice analysis should consider environmental risks to health or safety that are attributable to products or substances that the child is likely to come into contact with or ingest.
- EO 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government* (January 20, 2021), rescinded by EO 14148, directed agencies to evaluate whether their policies generate racially inequitable results when implemented and to make necessary changes to ensure underserved communities are properly supported. In acknowledgement that this work would require multi-generational commitment and whole-of-government approach. The 2022 *Department of Defense Equity Action Plan*, pursuant to EO 13985, included a strategy to advance equity and rectify past harms resulting from environmental and other impacts from defense activities on ancestral lands.
- EO 14008, *Tackling the Climate Crisis at Home and Abroad* (January 27, 2021), rescinded by EO 14154, previously amended EO 12898 to create, within the Executive Office of the President, a White House Environmental Justice Interagency Council (Interagency Council) and called for the Interagency Council to provide recommendations for further updating EO 12898.
- EO 14031, *Advancing Equity, Justice, and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islanders* (May 28, 2021), rescinded by EO 14148, sought to eliminate barriers to equity and justice for these populations. The 2022 *Department of Defense Equity Action Plan*, pursuant to EO 13985 (also rescinded by EO 14148), includes a strategy to advance equity and rectify past harms resulting from environmental and other impacts from defense activities on ancestral lands.
- EO 14091, *Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government* (February 16, 2023), rescinded by EO 14148, built on EO 13985 (also rescinded by EO 14148) by mandating a whole-of-government, multi-generational commitment to extending and strengthening equity-advancing requirements to support underserved community workforces, economy, housing, equity in health (including mental and behavioral health), civil rights, and equal justice under law.
- EO 14096, *Revitalizing Our Nation’s Commitment to Environmental Justice for All* (April 21, 2023), rescinded by EO 14154, directed all Federal agencies to prioritize outreach to communities with environmental justice concerns, which can include all demographics, and possible legacy pollution and systemic treatment. This involves providing and encouraging engagement opportunities for the public to share concerns and participate in decision-making such as revising agency procedures, which is especially encouraged for people affected by Federal actions. Those who do not normally engage would be notified and provided tools to further assist in the decision-making process.

### 3.13 Transportation and Traffic

The HDOT Highways Division and the City and County of Honolulu's DFM implement national standards for roadways and circulation in accordance with the *Statewide Federal-Aid Highways 2035 Transportation Plan* (HDOT, 2014), which is the statewide long-range surface transportation plan for the State of Hawai'i. The *2035 O'ahu Regional Transportation Plan* (ORTP) was prepared by the O'ahu Metropolitan Planning Organization (OahuMPO) and is also incorporated into the statewide plan (OahuMPO, 2011). OahuMPO approved the 2045 ORTP on April 27, 2021 (OahuMPO, 2021). Other regulatory policies and procedures related to the construction, operation, and management of roadways include the Transportation Research Board's *Highway Capacity Manual*, 2010 edition; the American Association of State Highway and Transportation Officials' *Policy on Geometric Design of Highways and Streets* and *Highway Safety Manual*; and the HDOT Highway Division's *2005 Standard Specifications and Special Provisions*.

### 3.14 Health and Human Safety

Numerous Federal and State regulations have been enacted for the well-being of workers and the general population, including the Occupational Safety and Health Act of 1970 (29 U.S.C. Section 651 *et seq.*), which established laws and regulations to ensure safe working conditions through enforcing standards and training requirements and is administered by OSHA. EO 12196, *Occupational Safety and Health Programs for Federal Employees*; DoDI 6055.01, *DoD Safety and Occupational Health Program*; and DoDI 6055.05, *Occupational and Environmental Health*, set safety and health guidelines for DoD employees in accordance with OSHA standards.

The Hawai'i Occupational Safety and Health Division administers the Hawai'i Occupational Safety and Health Law (HRS Chapter 396) and has jurisdiction over private sector employment on Federal land, including military installations, with some exceptions.

DoD Manual 6055.05, *Occupational Medical Examinations: Medical Surveillance and Medical Qualification*, implements occupational medical examinations and surveillance programs and adopts protective medical standards for blood lead levels to protect military personnel.

The Army has established various regulations and guidance documents to implement safety requirements of DoD policies, including DoDI 6055.01; DoDI 6055.05; DoDI 6055.06, *DoD Fire and Emergency Services Program*; DoDI 6055.07, *Mishap Notification, Investigation, Reporting, and Record Keeping*; and DoDI 6055.17, *DoD Emergency Management Program*. AR 385-10, *The Army Safety Program*, established safety standards designed to protect against serious injury, loss of life, and damage to property. AR 385-10 prescribed the Army's safety criteria and standards for operations and safety training. AR 11-35, *Occupational and Environmental Health Risk Management*, sets policies, responsibilities, and procedures for identifying, managing, and controlling occupational and environmental health risks. AR 385-63, *Range Safety*, and Army Pamphlet 385-63, *Range Safety*, include policies, procedures, and standards for risk management during range operations. Per Army Pamphlet 385-64, *Ammunition and Explosives Safety Standards*, SDZs are calculated to determine buffer areas to protect personnel and the public from live-fire operations.

Per Army Pamphlet 385-40, *Army Accident Investigations and Reporting*, which supports AR 385-10, accident reporting requirements are applied during all tactical/combat operations and training. Reporting requirements for occupational accidents are covered under Federal and State regulations. The SOPs for

KTA, Poamoho, and MMR instruct all military units to follow Army safety regulations while conducting training activities at those training areas, and it is the responsibility of the Range Safety Officer to ensure the safe operation of the training area (USAG-HI, 2020a; USAG-HI, 2020b; USAG-HI, 2021e).

AR 200-1, *Environmental Protection and Enhancement*, requires installations with unimproved grounds that present a wildfire hazard to develop and implement an IWFMP that is compliant and integral with the INRMP, the installations' existing fire and emergency services program plans, and the ICRMP (AR 200-1 Chapter 4 Section 3.d.12). AR 420-1, *Army Facilities Management*, requires Army installations to provide emergency response and rescue services for wildland fires (AR 420-1 Chapter 25 Section X). Army Wildland Fire Guidance dated March 15, 2021 and the Army Installation Management Command Wildland Fire Program Policy Memorandum dated November 7, 2022, provides guidance for developing IWFMPs. Wildland fire management on U.S. Government-controlled lands on O‘ahu is implemented by the Army and conducted in accordance with AR 200-1, AR 420-1, and guidance documents, as well as BOs and the Sikes Act to reduce the impacts of wildland fires on the mission and the environment. The IWFMP for O‘ahu Installations lays out specific guidance, procedures, and protocols for the prevention and suppression of wildfires on O‘ahu training areas, including KTA, Poamoho, and MMR. The IWFMP also describes the methods and procedures necessary to minimize fire frequency, severity, and size while providing military units the freedom to conduct training. The IWFMP and its training area-specific guidance detail the fire prevention briefings given to range users prior to commencement of training, notification lists in case of fire, operational decision charts for fires, and maps of essential firebreaks, fuel breaks, and firefighting infrastructure (USAG-HI, 2023b).

In addition, all training at KTA, Poamoho, and MMR, including on State-owned lands, adheres to procedures and requirements outlined in USARHAW Regulation 350-19; AR 350-19; the SOPs for KTA, Poamoho, and MMR; and the 1964 leases for the State-owned lands at KTA, Poamoho, and MMR. These regulations and procedures ensure the safety of Army personnel and the public during training activities.

**Consistency with Hawai'i State Plan,  
Environmental Policy,  
and O'ahu General Plan**

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## Appendix K

# CONSISTENCY WITH HAWAI‘I STATE PLAN, ENVIRONMENTAL POLICY, AND O‘AHU GENERAL PLAN

Table K-1: Hawai‘i State Plan, Hawai‘i Revised Statutes, Chapter 226 S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
<b>Section 226-4: State Goals.</b> In order to guarantee, for the present and future generations, those elements of choice and mobility that insure 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

<b>Table K-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>
(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>			
<b>(A) Planning for the State’s economy in general shall be directed toward achievement of the following objectives:</b>			
(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 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		
(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



<b>Table K-1: Hawai'i State Plan, Hawai'i Revised Statutes, Chapter 226</b> <b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>	S	N/S	N/A
(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>			
(A) Planning for the State's economy with regard to agriculture shall be directed towards achievement of the following objectives:			
(1) Viability of Hawai'i's sugar and pineapple industries.			X
(2) Growth and development of diversified agriculture throughout the State.			X
(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) To achieve the agriculture objectives, it shall be the policy of this State to:			
(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

<b>Table K-1: Hawai’i State Plan, Hawai’i Revised Statutes, Chapter 226</b> <b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>	S	N/S	N/A
(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) To achieve the visitor industry objective, it shall be the policy of this State to:			
(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

<b>Table K-1: Hawai'i State Plan, Hawai'i Revised Statutes, Chapter 226</b> <b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>	S	N/S	N/A
(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
(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.	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:			

<b>Table K-1: Hawai'i State Plan, Hawai'i Revised Statutes, Chapter 226</b> <b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>	S	N/S	N/A
(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
(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

<b>Table K-1: Hawai'i State Plan, Hawai'i Revised Statutes, Chapter 226</b> <b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>	S	N/S	N/A
(16) Foster the research and development of non-fossil fuel and energy efficient modes of transportation;			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:			

<b>Table K-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>
(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		
(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

<b>Table K-1: Hawai‘i State Plan, Hawai‘i Revised Statutes, Chapter 226</b> <b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>	S	N/S	N/A
(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>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

<b>Table K-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) Promote research to develop more efficient and economical treatment and disposal of solid and liquid wastes.			X
<b>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>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



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(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
(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>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

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(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>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) 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>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			X

<b>Table K-1: Hawai'i State Plan, Hawai'i Revised Statutes, Chapter 226</b> <b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>	S	N/S	N/A
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 very low-, low- and moderate-income segments of Hawai'i's population.			
(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>(B) To achieve the housing objectives, it shall be the policy of this State to</b>			
(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>226-20 Objectives and Policies for Socio-Cultural Advancement - Health.</b>			
<b>(A) Planning for the State's socio-cultural advancement with regard to health shall be directed towards achievement of the following objectives:</b>			
(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>(B) To achieve the health objectives, it shall be the policy of this State to:</b>			
(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

<b>Table K-1: Hawai’i State Plan, Hawai’i Revised Statutes, Chapter 226</b> <b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>	S	N/S	N/A
(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
(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>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>226-22 Objective and Policies for Socio-Cultural Advancement - Social Services.</b>			

<b>Table K-1: Hawai'i State Plan, Hawai'i Revised Statutes, Chapter 226</b> <b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>	S	N/S	N/A
<p>(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.</p> <p>(B) To achieve the social service objective, it shall be the policy of the State to:</p>			
<p>(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.</p>			X
<p>(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.</p>			X
<p>(3) Facilitate the adjustment of new residents, especially recently arrived immigrants, into Hawai'i's communities.</p>			X
<p>(4) Promote alternatives to institutional care in the provision of long-term care for elder and disabled populations.</p>			X
<p>(5) Support public and private efforts to prevent domestic abuse and child molestation, and assist victims of abuse and neglect.</p>			X
<p>(6) Promote programs which assist people in need of family planning services to enable them to meet their needs.</p>			X
<p><b>226-23 Objective and Policies for Socio-Cultural Advancement - Leisure.</b></p>			
<p>(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.</p>			
<p>(B) To achieve the leisure objective, it shall be the policy of this State to:</p>			
<p>(1) Foster and preserve Hawai'i's multi-cultural heritage through supportive cultural, artistic, recreational, and humanities-oriented programs and activities.</p>			X
<p>(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.</p>			X
<p>(3) Enhance the enjoyment of recreational experiences through safety and security measures, educational opportunities, and improved facility design and maintenance.</p>			X
<p>(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.</p>			X
<p>(5) Ensure opportunities for everyone to use and enjoy Hawai'i's recreational resources.</p>			X
<p>(6) Assure the availability of sufficient resources to provide for future cultural, artistic, and recreational needs.</p>			X
<p>(7) Provide adequate and accessible physical fitness programs to promote the physical and mental well-being of Hawai'i's people.</p>			X
<p>(8) Increase opportunities for appreciation and participation in the creative arts, including the literary, theatrical, visual, musical, folk, and traditional art forms.</p>			X

<b>Table K-1: Hawai’i State Plan, Hawai’i Revised Statutes, Chapter 226</b> <b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>	S	N/S	N/A
(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>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		X
<b>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>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:			

<b>Table K-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>
(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
<b>(C) To further achieve public safety objectives related to criminal justice, it shall be the policy of this State to:</b>			
(1) Support criminal justice programs aimed at preventing and curtailing criminal activities.			X
(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>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

Table K-2: Hawai’i State Environmental Policy, Hawai’i Revised Statutes, Chapter 344-4 S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
(1) Population.			
(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
(2) Land, water, mineral, visual, air, and other natural resources.			
(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
(3) Flora and fauna.			
(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
(4) Parks, recreation, and open space.			
(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		
(5) Economic development.			
(A) Encourage industries in Hawaii 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 Hawaii to protect the environment;	X		



<b>Table K-2: Hawai'i State Environmental Policy, Hawai'i Revised Statutes, Chapter 344-4</b> <b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>	<b>S</b>	<b>N/S</b>	<b>N/A</b>
(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) 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 Hawaii 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

<b>Table K-3: O’ahu General Plan</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>PART I: POPULATION</b>			
<b>Objective A: To plan for anticipated population in a manner that acknowledges the limits of O’ahu’s natural resources, protects the environment, and minimizes social, cultural, and economic disruptions.</b>			
Policy 1: Allocate efficiently the money and resources of the City in order to meet the needs of O’ahu's current and future population.			X
Policy 2: Provide adequate support facilities to accommodate future numbers of visitors to O’ahu while seeking to minimize disruption to residents and protect the natural environment.			X
Policy 3: Seek a balanced pace of physical development in harmony with the City's environmental, social, cultural, and economic goals by effecting and enforcing City regulations.			X
Policy 4: Establish geographic growth boundaries to accommodate future population growth while at the same time protecting valuable agricultural lands, environmental resources, and open space.			X
Policy 5: Support family planning and social equity.			X
<b>Objective B: To establish a pattern of population distribution that will allow the people of O’ahu to live, work and play in harmony.</b>			
Policy 1: Facilitate the full development of the primary urban center through higher-density redevelopment and the provision of adequate infrastructure.			X
Policy 2: Encourage development within the secondary urban center at Kapolei and the ‘Ewa and Central O’ahu urban-fringe areas to relieve developmental pressures in the remaining urban-fringe and rural areas and to meet housing needs not readily provided in the primary urban center.			X
Policy 3: Manage land use and development in the urban-fringe and rural areas so that: a. Development is contained within growth boundaries; and b. Population densities in all areas remain consistent with the character, culture, and environmental qualities desired for each community.			X
Policy 4: Direct growth according to Policies 1, 2, and 3 above by providing development capacity and needed infrastructure to support a distribution of O’ahu’s resident population that is consistent with the following for the Primary Urban Center: 43% distribution of the 2040 O’ahu population.			X
<b>PART II: BALANCED ECONOMY</b>			
<b>Objective A: To promote diversified economic opportunities that enable all the people of O’ahu to attain meaningful employment and a decent standard of living.</b>			
Policy 1: Support a strong, diverse, and dynamic economic base that protects the natural environment and is resilient to changes in global conditions.			X
Policy 2: Encourage the viability of businesses and industries, including support for small businesses, which contribute to the economic and social well-being of O’ahu residents.			X
Policy 3: Pursue opportunities to grow and strategically develop non-polluting industries such as healthcare, agriculture, renewable energy, and technology in appropriate locations			X

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<b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>				
	that contribute to O’ahu’s long-term environmental, economic, and social sustainability.			
Policy 4:	Support entrepreneurship and innovation through creative efforts such as partnerships with businesses and non-profit organizations, and by encouraging complementary policies that support access to capital markets.			X
Policy 5:	Foster a healthy business climate by streamlining regulatory processes to be transparent, predictable, and efficient.			X
Policy 6:	Encourage the development of local, national, and world markets for the products of O’ahu-based industries.			X
Policy 7:	Explore and encourage alternate economic models that reflect traditional cultural values and improve economic resilience, i.e., subsistence, barter and a culture of reciprocity and sharing.			X
<b>Objective B: To maintain a successful visitor industry that creates living wage employment, enhances quality of life, and actively supports our unique sense of place, natural beauty, Native Hawaiian culture, and multi-cultural heritage.</b>				
Policy 1:	Encourage the visitor industry to support the quality of the visitor experience, the economic and social well-being of communities, the environment, and the quality of life of residents.			X
Policy 2:	Respect and emphasize the value that Native Hawaiian culture, its cultural practitioners, and other established ethnic traditions bring to enrich the visitor experience and appreciation for island heritage, culture, and values.			X
Policy 3:	Guide the development and operation of visitor accommodations and attractions in a manner that avoids unsustainable increases in the cost of providing public services and infrastructure, and that respects existing lifestyles, cultural practices, and natural, cultural, and historic resources.			X
Policy 4:	Partner with the private sector to support the long-term viability of Waikiki as a world class visitor destination and as O’ahu’s primary resort area, and to support adequate adaptation strategies against climate change impacts.			X
Policy 5:	Provide related public expenditures for rural and urban-fringe areas that are highly impacted by the visitor industry.			X
Policy 6:	Provide for a high-quality, livable, and safe environment for visitors and residents in Waikiki, and support measures to ensure visitors’ and residents’ safety in all areas of O’ahu.			X
Policy 7:	Concentrate on the quality of the visitor experience in Waikiki, rather than on development densities.			X
Policy 8:	Facilitate the development of the following secondary resort areas: Ko ‘Olina, Turtle Bay, Hoakalei, and Mākaha Valley in a manner that respects existing lifestyles and the natural environment.			X
Policy 9:	Preserve scenic qualities of O’ahu for residents and visitors alike.			X

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Policy 10: Encourage physical improvements, social services, and cultural programs that contribute to a high-quality visitor experience, while seeking financial support of these improvements from the visitor industry.			X
<b>Objective C: To ensure the long-term viability, continued productivity, and sustainability of agriculture on O’ahu.</b>			
Policy 1: Foster a positive business climate for agricultural enterprises of all sizes, as well as innovative approaches to farming as a business, to ensure the continuation of agriculture as an important component of O’ahu’s economy.			X
Policy 2: Support agricultural diversification to strengthen the agricultural industry and make more locally grown food available for local consumption.			X
Policy 3: Foster market opportunities and increased consumer demand for safe, locally grown, fresh, processed, and value-added agricultural products.			X
Policy 4: Streamline the implementation of regulations to enhance a producer’s ability to develop, market, and distribute locally grown food and products.			X
Policy 5: Identify the economic benefits of local food production for local markets. Provide economic incentives to encourage local food production and sustainability, and encourage agricultural and aquaculture occupations.			X
Policy 6: Promote small-scale farming activities and other operations, such as truck farming, flower growing, aquaculture, livestock production, taro growing, subsistence farms, and community gardens.			X
Policy 7: Encourage landowners to actively use agricultural lands for agricultural purposes, and to pursue the long-term preservation of agricultural land with high productivity potential for agricultural production.			X
Policy 8: Encourage sustainable agricultural production to coexist on lands with renewable energy generation.			X
Policy 9: Prohibit the urbanization of agricultural land located outside the City’s growth boundaries.			X
Policy 10: Support and encourage technologies and agricultural practices that conserve and protect water, soil, air quality, and drainage areas, reduce carbon emissions, and promote public health and safety.			X
Policy 11: Support and encourage the availability and use of non-potable water for irrigation, where feasible.			X
Policy 12: Provide plans, incentives, and strategies to ensure the affordability of agricultural land for farmers.			X
Policy 13: Encourage both public and private investments to improve and expand agricultural infrastructure, such as irrigation systems, agricultural processing centers, and distribution networks.			X
Policy 14: Promote farming as a desirable and fulfilling occupation by encouraging agricultural education and training programs and by raising public awareness and appreciation for agriculture.			X

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Policy 15: Protect the right to farm by enforcing right-to-farm laws, enacting policies to protect agricultural operations, and imposing meaningful buffer zones.			X
Policy 16: Seek ways to discourage agricultural theft and vandalism.			X
Policy 17: Recognize the scenic value of agricultural lands as an open-space resource and amenity.			X
Objective D: To use the economic resources of the sea in a sustainable manner.			
Policy 1: Encourage the fishing industry to maintain its viability at a level that does not degrade or damage marine ecosystems.			X
Policy 2: Encourage the ongoing development of aquaculture, ocean research, and other ocean-related industries.			X
Policy 3: Encourage the expansion of ocean recreation activities for residents and visitors that are operated in a sustainable manner.			X
Objective E: To ensure meaningful employment and economic equity.			
Policy 1: Support public and private training and employment programs to prepare residents for existing and future jobs, including those for historically marginalized communities.			X
Policy 2: Make full use of State and Federal employment and training programs.			X
Policy 3: Encourage the provision of retraining programs for workers in industries with planned reductions in their labor force.			X
Policy 4: Identify emerging industries, encourage investments needed to support the industries, and develop a skilled workforce in these fields			X
Objective F: To maintain federal programs and economic activity on O’ahu consistent with the City’s infrastructure and environmental goals.			
Policy 1: Take full advantage of Federal programs and grants which will contribute to the economic and social well-being of O’ahu’s residents.			X
Policy 2: Encourage the Federal government to pay for the cost of public services used by Federal agencies.			X
Policy 3: Encourage the Federal government to lease new facilities rather than construct them on tax exempt public land.			X
Policy 4: Encourage the military to purchase locally all needed services and supplies which are available on O’ahu.			X
Policy 5: Encourage the continuation of a high level of military-related employment both on and off base in the Hickam-Pearl Harbor, Wahiawā, Kailua-Kāne’ohe, and ‘Ewa areas.			X
Objective G: To bring about orderly economic growth on O’ahu.			
Policy 1: Concentrate economic activity and government services in the primary urban center and in the secondary urban center at Kapolei.			X
Policy 2: Advance the equitable distribution of City capital spending, employment opportunities, infrastructure investments, and other benefits throughout communities based on need			X

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and regardless of income level. Allow infrastructure and business activity in urban fringe areas appropriate to population needs.			
Policy 3: Maintain sufficient land in appropriately located commercial and industrial areas to help ensure a favorable business climate on O’ahu.			X
Policy 4: Encourage the continuation of a high level of military-related employment in the Hickam-Pearl Harbor, Wahiawa, Kailua-Kaneohe, and ‘Ewa areas.			X
<b>PART III: NATURAL ENVIRONMENT AND RESOURCE STEWARDSHIP</b>			
Objective A: To protect and preserve the natural environment.			
Policy 1: Protect O’ahu's natural environment, especially the shoreline, valleys, and ridges, from incompatible development.			X
Policy 2: Seek the restoration of environmentally damaged areas and natural resources.			X
Policy 3: Preserve, protect, and restore stream flows and stream habitats to support aquatic and environmental processes and riparian, scenic, recreational, and Native Hawaiian cultural resources.			X
Policy 4: Require development projects to give due consideration to natural features and hazards such as slope, inland and coastal erosion, flood hazards, water-recharge areas, and existing vegetation, as well as to plan for coastal hazards that threaten life and property.			X
Policy 5: Require sufficient setbacks from O’ahu’s shorelines to protect life and property, preserve natural shoreline areas and sandy beaches, and minimize the future need for protective structures or relocation of structures.			X
Policy 6: Design and maintain surface drainage and flood-control systems in a manner which will help preserve natural and cultural resources.			X
Policy 7: Protect the natural environment from damaging levels of air, water, and noise pollution.	X		
Policy 8: Protect plants, birds, and other animals that are unique to the State of Hawai’i and the Island of O’ahu.	X		
Policy 9: Increase tree canopy and ensure its integration into new developments, and protect significant trees on public and private lands.			X
Policy 10: Increase public awareness and appreciation of O’ahu's land, air, and water resources.			X
Policy 11: Support the State and federal governments in the protection of the unique environmental, marine, cultural and wildlife assets of the Northwestern Hawaiian Islands.			X
Policy 12: Plan, prepare for, and mitigate the impacts of climate change on the natural environment, including strategies of adaptation.			X
Objective B: To preserve and enhance the natural monuments and scenic views of O’ahu for the benefit of both residents and visitors.			

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Policy 1:	Protect the Island's well-known resources: its mountains and craters; forests and watershed areas; marshes, rivers, and streams; shoreline, fishponds, and bays; and reefs and offshore islands.			X
Policy 2:	Protect O’ahu's scenic views, especially those seen from highly developed and heavily traveled areas.			X
Policy 3:	Locate roads, highways, and other public facilities and utilities in areas where they will least obstruct important views of the mountains and the sea.			X
Policy 4:	Protect and expand public access to the natural and coastal environment for recreational, educational, and cultural purposes, and maintain access in a way that does not damage natural, historic, or cultural resources.			X
<b>PART IV: HOUSING</b>				
Objective A: To ensure a balanced mix of housing opportunities and choices for all residents at prices they can afford.				
Policy 1:	Support programs, policies, and strategies that will provide decent and affordable homes for local residents, especially those in the lowest income brackets			X
Policy 2:	Streamline approval and permit procedures, in a transparent manner, for housing and other development projects.			X
Policy 3:	Encourage innovative residential developments that result in lower costs, sustainable use of resources, more efficient use of land and infrastructure, greater convenience and privacy, and a distinct community identity.			X
Policy 4:	Support and encourage programs to maintain and improve the condition of existing housing.			X
Policy 5:	Make full use of government programs that provide assistance for low- and moderate-income renters and homebuyers.			X
Policy 6:	Maximize local funding programs available for affordable housing.			X
Policy 7:	Provide financial and other incentives to encourage the private sector to build homes for low- and moderate-income residents.			X
Policy 8:	Encourage and participate in joint public-private development of low- and moderate-income housing.			X
Policy 9:	Encourage the replacement of low- and moderate-income housing in areas which are being redeveloped at higher densities.			X
Policy 10:	Promote the design and construction of dwellings which take advantage of O’ahu's year-round moderate climate and use other sustainable design techniques.			X
Policy 11:	Encourage the construction of affordable homes within established low-density and rural communities by such means as ‘ohana units, duplex dwellings, and cluster development that embraces the ‘ohana concept by maintaining multi-generational proximity for local families.			X

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Policy 12: Promote higher-density, mixed-use development where appropriate, including rail transit-oriented development, to increase the supply of affordable and market housing in convenient proximity to jobs, schools, shops, and public transit.			X
Policy 13: Encourage the production and maintenance of affordable rental housing.			X
Policy 14: Encourage the provision of affordable housing designed for the elderly and people with disabilities in locations convenient to critical services and to public transit.			X
Policy 15: Encourage equitable relationships between landowners and leaseholders, between landlords and tenants, and between condominium developers and owners.			X
Policy 16: Support collaborative partnerships that work toward immediate solutions to house and service homeless populations and also toward long-term strategies to prevent and eliminate homelessness.			X
Policy 17: Support programs to address all facets of homelessness, so that every homeless person has a place to stay, along with the infrastructure and support services that are needed.			X
<b>Objective B: To reduce speculation in land and housing.</b>			
Policy 1: Encourage the State government to coordinate its urban-area designations with the developmental policies of the City and County.			X
Policy 2: Discourage speculation in lands outside of areas planned for urban use, reduce the prevalence of vacant dwelling units, and reduce the use of residential dwelling units for short-term vacation rentals.			X
Policy 3: Seek public benefits from increases in the value of land owing to City and State developmental policies and decisions.			X
Policy 4: Require government-subsidized housing to be delivered to appropriate purchasers and renters.			X
Policy 5: Ensure that owners of housing properties, including government-subsidized housing, maintain housing affordability over the long term.			X
<b>Objective C: To provide residents with a choice of living environments that are reasonably close to employment, schools, recreation, and commercial centers, and that are adequately served by transportation networks and public utilities.</b>			
Policy 1: Ensure that residential developments offer affordable housing to people of different income levels and to families of various sizes to alleviate the existing condition of overcrowding.			X
Policy 2: Encourage the fair distribution of low- and moderate-income housing throughout the Island.			X
Policy 3: Encourage the co-location of residential development and employment centers with commercial, educational, social, and recreational amenities in the development of desirable communities.			X



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Policy 4:	Encourage residential development in suburban areas where existing roads, utilities, and other community facilities are not being used to capacity, and in urban areas where higher densities may be readily accommodated.			X
Policy 5:	Support mixed-use development and higher-density redevelopment in areas surrounding rail transit stations.			X
Policy 6:	Discourage residential development in areas where the topography makes construction difficult or hazardous, where sea level rise and flooding are a hazard, and where providing and maintaining roads, utilities, and other facilities would be extremely costly or environmentally damaging.			X
Policy 7:	Encourage public and private investments in older communities as needed to keep the communities vibrant and livable.			X
Policy 8:	Encourage the military to provide housing for active duty personnel and their families on military bases and in areas turned over to military housing contractors.			X
<b>PART V: TRANSPORTATION AND UTILITIES</b>				
Objective A:	To create a multi-modal transportation system that moves people and goods safely, efficiently, and at a reasonable cost and minimizes fossil fuel consumption and greenhouse gas emissions; serves all users, including limited income, elderly, and disabled populations; and is integrated with existing and planned development.			
Policy 1:	Develop a comprehensive, well-connected and integrated ground transportation system that reduces carbon emissions and enables safe, comfortable and convenient travel for all users, including motorists, pedestrians, bicyclists, and public transportation users of all ages and abilities.			X
Policy 2:	Provide multi-modal transportation services to people living within the ‘Ewa, Central O’ahu, and Pearl City-Hawai’i Kai corridors primarily through a mass transit system including exclusive right-of-way rail transit and feeder-bus components as well as through the existing highway system.			X
Policy 3:	Provide transportation services outside the ‘Ewa, Central O’ahu, and Pearl City-Hawai’i Kai corridors primarily through a system of express- and feeder-buses as well as through the highway system with limited to moderate improvements sufficient to meet the needs of the communities being served.			X
Policy 4:	Work with the State to ensure adequate and safe access for communities served by O’ahu's coastal highway system, and to plan for the relocation of highways and roads subject to sea level rise away from coastlines.			X
Policy 5:	Support the rail transit system as the transportation spine for the urban core, with links to the airport and maritime terminals, which will work together with other alternative modes of transit and transit-oriented development to reduce automobile dependency and increase multi-modal travel.			X
Policy 6:	Support the development of transportation plans, programs, and facilities that are based on Complete Streets features. Maintain and improve road, bicycle, pedestrian, and micro mobility facilities in existing communities to eliminate unsafe conditions.			X
Policy 7:	Design street networks to incorporate greater roadway and pathway connectivity.			X

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Policy 8:	Make available transportation services to people with limited mobility: the young, the elderly, the handicapped, and the poor.			X
Policy 9:	Consider environmental, social, cultural, and climate change and natural hazard impacts, as well as construction and operating costs, as important factors in planning transportation system improvements.			X
Policy 10:	Reduce traffic congestion and maximize the efficient use of transportation resources by pursuing transportation demand management strategies such as carpooling, telecommuting, flexible work schedules, and incentives to use alternative travel modes.			X
Policy 11:	Enhance pedestrian-friendly and bicycle-friendly travel via public and private programs and improvements.			X
Policy 12:	Maintain separate aviation facilities for general aviation operations to supplement the capacity of the Daniel K. Inouye International Airport.			X
Policy 13:	Support improvements to Kalaeloa Barbers Point Harbor as O’ahu’s second deep-water harbor.			X
Policy 14:	Support the operation, maintenance and improvement of Honolulu Harbor as O’ahu’s primary cargo and ocean transportation hub.			X
Policy 15:	Advance the transition to electric and alternative fuel infrastructure to provide adequate and accessible charging spaces and renewal fueling stations for ground transportation on O’ahu.			X
Objective B: Provide an adequate supply of water and environmentally sound systems of waste disposal for O’ahu’s existing population and for future generations, and support a one water approach that uses and manages freshwater, wastewater, and stormwater resources in an integrated manner.				
Policy 1:	Develop and maintain an adequate, safe, and reliable supply of fresh water in a cost-effective way that supports the long-term sustainability of the resource and considers the impacts of climate change.			X
Policy 2:	Help to develop and maintain an adequate, safe, and reliable supply of water for agricultural and industrial needs in a resource-integrated and cost-effective way that supports the long-term health of the resource.			X
Policy 3:	Use technologies that provide water, waste disposal, and recycling services at a reasonable cost and in a manner that addresses environmental and community impacts.			X
Policy 4:	Encourage the increased availability and use of recycled or brackish water to meet nonpotable demands.			X
Policy 5:	Pursue strategies and programs to reduce the per capita consumption of water and the per capita production of waste.			X
Policy 6:	Provide safe, reliable, efficient, and environmentally sound waste-collection, waste disposal, and recycling services that consider the near- and long-term impacts of climate change during the siting and construction of new facilities.			X

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Policy 7:	Pursue programs to expand on-island recycling and resource recovery from O’ahu’s solid waste and wastewater streams.			X
Policy 8:	Support initiatives that educate the community about the importance of conserving resources and reducing waste streams through reduction, reuse, and recycling.			X
Policy 9:	Require the safe use and disposal of hazardous materials.			X
Objective C: To ensure reliable, cost-effective, and responsive service for all utilities with equitable access for residents.				
Policy 1:	Maintain and upgrade utility systems in order to avoid major breakdowns and service interruptions.			X
Policy 2:	Provide improvements to utilities in existing neighborhoods to reduce substandard conditions, and increase resilience to use fluctuations, natural hazards, extreme weather, and other climate impacts.			X
Policy 3:	Facilitate timely and orderly upgrades and expansions of utility systems.			X
Policy 4:	Increase the efficiency of public-serving utilities by encouraging a mixture of uses with peak periods of demand aligning with the availability of resources.			X
Objective D: To maintain transportation and utility systems which will help O’ahu continue to be a desirable place to live and visit.				
Policy 1:	Provide adequate resources to ensure the maintenance and improvement of transportation systems and utilities.			X
Policy 2:	Evaluate the social, cultural, economic, and environmental impact of additions to the transportation and utility systems before they are constructed.			X
Policy 3:	Require the installation of underground utility lines wherever feasible.			X
Policy 4:	Seek improved taxing powers for the City in order to provide a more equitable means of financing transportation and utility services.			X
Policy 5:	Evaluate impacts of sea level rise on existing public infrastructure, especially sewage treatment plants, roads, and other public and private utilities located along or near O’ahu’s coastal areas, and avoid the placement of future public infrastructure in threatened areas.			X
<b>PART VI: ENERGY</b>				
Objective A: To increase energy self-sufficiency through renewable energy and maintain an efficient, reliable, resilient, and cost-efficient energy system.				
Policy 1:	Encourage the implementation of a comprehensive plan to guide and coordinate energy conservation and renewable energy development and utilization programs.			X
Policy 2:	Support and encourage programs and projects, including economic incentives, regulatory measures, and educational efforts, and seek to eliminate O’ahu’s dependence on fossil fuels.			X
Policy 3:	Ensure access to an adequate reserve of fuel and energy supplies to aid disaster response and recovery.			X

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<b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>				
Policy 4:	Support the increased use of solid waste energy recovery and other biomass energy conversion systems.			X
Policy 5:	Support and participate in research, development, demonstration, commercialization, and optimization programs aimed at developing cost-effective and environmentally sound renewable energy supplies.			X
Policy 6:	Support State and federal initiatives to utilize renewable energy sources.			X
Policy 7:	Manage resources and development of communities in line with long-term efficiency and sustainability goals and targets in the areas of energy, carbon emissions, waste streams, all utilities, and food security.			X
Policy 8:	Encourage and equitably incentivize the use of commercially available renewable energy systems in public facilities, institutions, residences, and business developments.			X
Policy 9:	Consider health, safety, environmental, cultural, and aesthetic impacts, as well as resource limitations, land use patterns, and relative costs in all major decisions on renewable energy.			X
Policy 10:	Work closely with the State and federal governments in the formulation and implementation of all City energy-related programs and regulations, including updating building energy codes.			X
<b>Objective B: To conserve energy through the more efficient management of its use and through more energy-efficient technologies.</b>				
Policy 1:	Ensure that the efficient use of energy is a primary factor in the preparation and administration of land use plans and regulations.			X
Policy 2:	Provide incentives and, where appropriate, mandatory controls to achieve energy efficient and sustainable siting and design of new developments. Support the increased use of nationally recognized energy efficiency and resource conservation rating and certification systems.			X
Policy 3:	Provide incentives and, where appropriate, mandatory controls to reduce energy consumption in existing buildings and outdoor facilities, and in design and construction practices.			X
Policy 4:	Promote the development of a multi-modal transportation system that minimizes and seeks to eliminate fossil fuel consumption and greenhouse gas emissions.			X
Policy 5:	Encourage the implementation of an adaptable and reliable electrical grid, energy transmission, energy storage, microgrids, and energy generation technologies.			X
Policy 6:	Support the availability and use of energy efficient vehicles, especially hybrid, fuel cell, and pure electrical vehicles.			X
<b>Objective C: To foster an ethic of energy conservation that inspires residents to engage in sustainable practices.</b>				
Policy 1:	Provide citizens with the information they need to fully understand severe climate change, supply chain issues, costs, security, and other issues associated with O’ahu's dependence on imported fossil fuels.			X

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<b>S = Supportive, N/S = Not Supportive, N/A = Not Applicable</b>				
Policy 2:	Increase consumer awareness of available renewable energy sources and their costs and benefits.			X
Policy 3:	Provide information concerning the impact of public and private decisions on future energy generation, transmission, storage, and use.			X
Policy 4:	Provide communities with timely, relevant, and accurate information concerning renewable energy facilities proposed in their area, and ensure adequate buffer zones required for health or safety.			X
<b>PART VII: PHYSICAL DEVELOPMENT AND URBAN DESIGN</b>				
Objective A: To coordinate changes in the physical environment of O‘ahu to ensure that all new developments are timely, well-designed, and appropriate for the areas in which they will be located.				
Policy 1:	Provide infrastructure improvements to serve new growth areas, redevelopment areas, and areas with badly deteriorating infrastructure.			X
Policy 2:	Coordinate the location and timing of new development with the availability of adequate water supply, sewage treatment, drainage, transportation, and other public facilities and services.			X
Policy 3:	Require new developments to provide or pay the cost of all essential community services, including roads, utilities, schools, parks, and emergency facilities that are intended to directly serve the development.			X
Policy 4:	Facilitate and encourage compact, higher-density development in urban areas designated for such uses.			X
Policy 5:	Encourage the establishment of mixed-use town centers that are compatible with the physical and social character of their community.			X
Policy 6:	Facilitate transit-oriented development in rail transit station areas to create live/work/play multi-modal communities that reduce travel and traffic congestion.			X
Policy 7:	Encourage the clustering of development to reduce the cost of providing utilities and other public services.			X
Policy 8:	Locate new industries and new commercial areas so that they will be well-related to their markets and suppliers, and to residential areas and transportation facilities.			X
Policy 9:	Locate community facilities on sites that will be convenient to the people they are intended to serve.			X
Policy 10:	Discourage uses which are major sources of noise, air, and light pollution			X
Policy 11:	Implement siting and design solutions that seek to reduce exposure to natural hazards, including those related to climate change, flooding, and sea level rise.			X
Policy 12:	Prohibit new airfields, high-powered electromagnetic-radiation sources, and storage places for fuel and explosives from locating on sites where they will endanger or disrupt nearby communities.			X
Policy 13:	Promote opportunities for the community to participate meaningfully in planning and development processes, including new forms of communication and social media.			X

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<b>Objective B: To plan and prepare for the long-term physical impacts of climate change.</b>			
Policy 1: Integrate climate change adaptation into the planning, design, and construction of all significant improvements to and development of the built environment.			X
Policy 2: Coordinate plans in the private and public sectors that support research, monitoring, and educational programs on climate change.			X
Policy 3: Prepare for the anticipated impacts of climate change and sea level rise on existing communities and facilities through mitigation, adaptation, managed retreat, or other measures in exposed areas.			X
<b>Objective C: To develop the urban corridor stretching from Wai’alae-Kāhala to Pearl City as the island's primary urban center.</b>			
Policy 1: Provide downtown Honolulu and other major business centers with a well-balanced mixture of uses.			X
Policy 2: Encourage the development of attractive residential communities in downtown and other business centers.			X
Policy 3: Maintain and improve downtown as the financial and office center of the island, and as a major retail center.			X
Policy 4: Provide for the continued viability of the Hawai’i Capital District as a center of government activities and as an attractive park-like setting in the heart of the city.			X
Policy 5: Foster the development of Honolulu’s waterfront as the State’s major port and maritime center, as a people-oriented mixed-use area, and as a major recreation area with accommodation for sea level rise.			X
<b>Objective D: To develop a secondary urban center in ‘Ewa with its nucleus in the Kapolei area.</b>			
Policy 1: Support public projects that are needed to facilitate development of the secondary urban center at Kapolei.			X
Policy 2: Encourage the development of a major residential, commercial, and employment center within the secondary urban center at Kapolei.			X
Policy 3: Encourage the continuing development of the area encompassing Campbell Industrial Park, Kalaeloa Barbers Point Harbor, and West Kapolei as a major industrial center.			X
Policy 4: Coordinate plans for the development of the secondary urban center at Kapolei with the State and federal governments, major landowners and developers, and the community.			X
Policy 5: Cooperate with the State and federal governments in the improvements to the deep water harbor at Kalaeloa Barbers Point.			X
Policy 6: Encourage the development of the Ocean Pointe/Hoakalei Communities as a major residential and recreation area emphasizing recreational activities and a waterfront commercial center containing light-industrial, commercial, and visitor accommodation uses.			X
<b>Objective E: To maintain those development characteristics in the urban-fringe and rural areas which make them desirable places to live.</b>			

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Policy 1:	Develop and maintain urban-fringe areas as predominantly residential areas characterized by generally low rise, low density development which may include significant levels of retail and service commercial uses as well as satellite institutional and public uses geared to serving the needs of households.			X
Policy 2:	Coordinate plans for developments within the ‘Ewa and Central O’ahu urban-fringe areas with the State and Federal governments and with major landowners and developers, agricultural industries, and the community			X
Policy 3:	Maintain a “green belt” of open space and agricultural land around developed communities in the ‘Ewa and Central O’ahu areas of O’ahu.			X
Policy 4:	Maintain rural areas that reflect an open and scenic setting, dominated by small to moderate size agricultural pursuits, with small towns of low-density and low-rise character, and which allows modest growth opportunities tailored to address area residents’ future needs.			X
Policy 5:	Encourage the development of a variety of housing choices including affordable housing in rural communities, to give people the choice to continue to live in the community that they were raised in.			X
Policy 6:	Ensure the social and economic vitality of rural communities by supporting infill development and modest increases in heights and densities around existing rural town areas where feasible to maintain an adequate supply of housing for future generations.			X
Objective F: To create and maintain attractive, meaningful, and stimulating environments throughout O’ahu.				
Policy 1:	Encourage distinctive community identities for both new and existing communities and neighborhoods.			X
Policy 2:	Require the consideration of urban design principles in all development projects.			X
Policy 3:	Require developments in stable, established communities and rural areas to be compatible with the existing communities and areas.			X
Policy 4:	Provide design guidelines and controls that will allow more compact development and intensive use of lands in the primary urban center and along the rail transit corridor.			X
Policy 5:	Seek to protect residents’ quality of life and to maintain the integrity of neighborhoods by strengthening regulatory and enforcement strategies that address the presence of inappropriate non-residential activities.			X
Policy 6:	Promote public and private programs to beautify the urban and rural environments.			X
Policy 7:	Design public structures to meet high aesthetic and functional standards and to complement the physical character of the communities they will serve.			X
Policy 8:	Design public street networks to be safe and accessible for users of all ages and abilities, to accommodate multiple modes of travel to be visually attractive and to support sustainable ecological processes, such as stormwater infiltration.			X
Policy 9:	Recognize the importance of using Native Hawaiian plants in landscaping to further the traditional Hawaiian concept of mālama ‘āina and to create a more Hawaiian sense of place.			X

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	<b>S</b>	<b>N/S</b>	<b>N/A</b>
<b>Objective G: To promote and enhance the social and physical character of O’ahu's older towns and neighborhoods.</b>			
Policy 1: Encourage new construction in established areas to be compatible with the character and cultural values of the surrounding community.			X
Policy 2: Encourage, wherever desirable, the rehabilitation of existing substandard structures.			X
Policy 3: Provide and maintain roads, public facilities, and utilities without damaging the character of older communities.			X
Policy 4: Seek the satisfactory relocation of residents before permitting their displacement by new development, redevelopment, or neighborhood rehabilitation.			X
Policy 5: Acknowledge the cultural and historical significance of kuleana lands, the ancestral ownership of kuleana lands, and promote policies that preserve and protect kuleana lands.			X
Policy 6: Support and encourage cohesive neighborhoods which foster interactions among neighbors, promote vibrant community life, and enhance livability.			X
<b>PART VIII: PUBLIC SAFETY AND COMMUNITY RESILIENCE</b>			
<b>Objective A: To prevent and control crime and maintain public order.</b>			
Policy 1: Provide a safe environment for residents and visitors on O’ahu.			X
Policy 2: Provide adequate criminal justice facilities and staffing for City and County law-enforcement agencies.			X
Policy 3: Provide adequate training, staffing, and support for City public safety agencies.			X
Policy 4: Emphasize improvements to police and prosecution operations which will result in a higher proportion of wrongdoers who are arrested, convicted, and punished for their crimes.			X
Policy 5: Support policies and programs that expand access to treatment, rehabilitation, and reentry programs for adult and juvenile offenders.			X
Policy 6: Keep the public informed of the nature and extent of criminal activity on O’ahu			X
Policy 7: Establish and maintain programs to encourage public cooperation in the prevention and solution of crimes, and promote strong community-police relationships.			X
Policy 8: Seek the help of State and federal law-enforcement agencies to curtail the activities of organized crime syndicates on O’ahu.			X
Policy 9: Conduct periodic reviews of criminal laws to ensure their relevance to the community's needs and values.			X
Policy 10: Cooperate with other law-enforcement agencies to develop new methods of addressing crime. Support communication and coordination across federal, State and City law enforcement and corrections agencies.			X
Policy 11: Encourage the improvement of rehabilitation programs and facilities for criminals and juvenile offenders.			X



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<b>Objective B: To protect the people of O’ahu and their property against natural disasters and other emergencies, traffic and fire hazards, and unsafe conditions.</b>				
Policy 1:	Keep up-to-date and enforce all City and County safety regulations.			X
Policy 2:	Require all developments in areas subject to floods and tsunamis, and coastal erosion to be located and constructed in a manner that will not create any health or safety hazards or cause harm to natural and public resources.			X
Policy 3:	Participate with State and federal agencies in the funding and construction of flood control projects, and prioritize the use of ecologically sensitive flood-control strategies whenever feasible.			X
Policy 4:	Collaborate with State and federal agencies to provide emergency warnings, protection, mitigation, response, and recovery, during and after major emergencies such as tsunamis, hurricanes, and other high-hazard events.			X
Policy 5:	Cooperate with State and federal agencies to provide protection from war, civil disruptions, pandemics, and other major disturbances.	X		X
Policy 6:	Reduce hazardous traffic conditions.			X
Policy 7:	Provide adequate resources to effectively prepare for and respond to natural and manmade threats to public safety, property, and the environment.	X		
Policy 8:	Foster disaster-ready communities and households through implementation of resilience hubs and other resiliency strategies.			X
Policy 9:	Plan for the impacts of climate change and sea level rise on public safety, in order to minimize potential future hazards.			X
Policy 10:	Develop emergency management plans, policies, programs, and procedures to protect and promote public health, safety, and welfare of the people.			X
Policy 11:	Provide educational materials on emergency management preparedness, fire protection, traffic hazards, and other unsafe conditions.			X
<b>PART IX: HEALTH AND EDUCATION</b>				
<b>Objective A: To protect the health and well-being of residents and visitors.</b>				
Policy 1:	Encourage the provision of health-care facilities that are accessible to both employment and residential centers.			X
Policy 2:	Encourage prompt and adequate ambulance and first-aid services in all areas of O’ahu.			X
Policy 3:	Coordinate City and County health codes and other regulations with State and Federal health codes to facilitate the enforcement of air-, water-, and noise-pollution controls.			X
Policy 4:	Integrate public health concerns such as air and water pollution as a consideration in land use planning decisions.			X
Policy 5:	Encourage healthy lifestyles by supporting opportunities that increase access to and promote consumption of fresh, locally grown foods.			X

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Policy 6:	Encourage healthy lifestyles through walkable and livable communities, safe street crossings, safe routes to schools, and parks and pathways for pedestrians and bicyclists.			X
Policy 7:	Support efforts to make healthcare accessible and affordable for everyone.			X
Policy 8:	Support efforts to improve and expand access to mental health, drug treatment, community-based programs, and other similar programs for those requiring such services.			X
Policy 9:	Support becoming an age-friendly city that provides people of all ages with user-friendly parks and other public gathering places, that offers safe streets and multi-modal transportation options, that provides an adequate supply of affordable housing, that encourages growth in needed and desirable jobs, that provides quality health-care and support services, and that encourages civic participation, social inclusion, and respect between interest groups.			X
Policy 10:	Plan for our aging population’s growing health-care, personal service, and diverse daily activity needs, and encourage these services to be provided in a timely manner, including age-specific social activities.			X
<b>Objective B: To provide a wide range of educational opportunities for the people of O’ahu.</b>				
Policy 1:	Support education programs that encourage the development of employable skills.			X
Policy 2:	Encourage the provision of informal educational programs for people of all age groups.			X
Policy 3:	Encourage the after-hours use of school buildings, grounds, and facilities.			X
Policy 4:	Encourage the construction of school facilities that are designed for flexibility and high levels of use.			X
Policy 5:	Facilitate the appropriate location of childcare facilities as well as learning institutions from the preschool through the university levels			X
Policy 6:	Encourage outdoor learning opportunities and venues that reflect our unique natural environment and Native Hawaiian culture.			X
<b>Objective C: To make Honolulu the center of higher education in the Pacific.</b>				
Policy 1:	Encourage continuing improvement in the quality of higher education in Hawai’i, as well as ways to make higher education more affordable.			X
Policy 2:	Encourage the development of diverse opportunities in higher education.			X
Policy 3:	Encourage research institutions to establish branches on O’ahu.			X
Policy 4:	Establish Honolulu as a knowledge center and international Pacific crossroads hub.			X
<b>PART X: CULTURE AND RECREATION</b>				
<b>Objective A: To foster the multiethnic culture of Hawai’i and respect the host culture of the Native Hawaiian people.</b>				
Policy 1:	Recognize the Native Hawaiian host culture, including its customs, language, history, and close connection to the natural environment, as a dynamic, living culture and as an integral part of O’ahu’s way of life.			X

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Policy 2:	Promote the preservation and enhancement of local cultures, values and traditions.			X
Policy 3:	Encourage greater public awareness, understanding, and appreciation of the cultural heritage and contributions to Hawai’i made by O’ahu’s various ethnic groups.			X
Policy 4:	Foster equity and increased opportunities for positive interaction among people with different ethnic, social, and cultural backgrounds.			X
Policy 5:	Preserve the identities of the historical communities of O’ahu.			X
<b>Objective B: To preserve and enhance O’ahu’s cultural, historic, architectural, and archaeological resources.</b>				
Policy 1:	Promote the restoration and preservation of early Hawaiian structures, artifacts, and landmarks.			X
Policy 2:	Identify and, to the extent possible, preserve and restore buildings, sites, and areas of social, cultural, historic, architectural, and archaeological significance.	X		
Policy 3:	Cooperate with the State and federal governments in developing and implementing a comprehensive preservation program for social, cultural, historic, architectural, and archaeological resources.	X		
Policy 4:	Promote the interpretive and educational use of cultural, historic, architectural, and archaeological sites, buildings, and artifacts.	X		
Policy 5:	Seek public and private funds, and encourage public participation and support, to protect, preserve and enhance social, cultural, historic, architectural, and archaeological resources.	X		
Policy 6:	Provide incentives for the restoration, preservation, maintenance, and enhancement of social, cultural, historic, architectural, and archaeological resources.	X		
Policy 7:	Encourage the protection of areas that are historically important to Native Hawaiian cultural practices and to the cultural practices of other ethnicities, in order to further preserve and continue these practices for future generations.			X
<b>Objective C: To foster the visual and performing arts.</b>				
Policy 1:	Encourage and support programs and activities for the visual and performing arts.			X
Policy 2:	Encourage creative expression and access to the arts by all segments of the population.			X
Policy 3:	Provide permanent art in appropriate City public buildings and places.			X
<b>Objective D: To provide a wide range of recreational facilities and services that are readily available to residents and visitors alike, and to balance access to natural areas with the protection of those areas.</b>				
Policy 1:	Develop and maintain community-based parks to meet the needs of the different communities on O’ahu.			X
Policy 2:	Develop, maintain, and expand a system of regional parks and specialized recreation facilities, based on the cumulative demand of residents and visitors.			X
Policy 3:	Develop, maintain, and improve urban parks, squares, and beautification areas in high density urban places.			X

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Policy 4:	Encourage public and private botanic and zoological parks on O‘ahu to foster an awareness and appreciation of the natural environment.			X
Policy 5:	Encourage the State to develop and maintain a system of natural resource-based parks, such as beach, shoreline, and mountain parks.			X
Policy 6:	Ensure that public recreational facilities balance the demand for facilities against capital and operating cost constraints so that they are adequately sized and properly maintained			X
Policy 7:	Ensure and maintain convenient and safe access to beaches, ocean environments and mauka recreation areas in a manner that protects natural and cultural resources.			X
Policy 8:	Encourage ocean and water-oriented recreation activities that do not adversely impact the natural environment and cultural assets, or result in overcrowding or overuse of beaches, shoreline areas and the ocean.			X
Policy 9:	Require all new developments to provide their residents with adequate recreation space.			X
Policy 10:	Utilize our unique natural environment in a responsible way to promote cultural events and activities, and maintain cultural practices.			X
Policy 11:	Encourage the after-hours, weekend, and summertime use of public schools facilities for recreation.			X
Policy 12:	Provide for safe and secure use of public parks, beaches, and recreation facilities.			X
Policy 13:	Create and promote recreational venues for kūpuna and keiki and for kama‘āina and malihini.			X
Policy 14:	Encourage the State and Federal governments to transfer excess and underutilized land to the City and County for public recreation use.			X
<b>PART XI: GOVERNMENT OPERATIONS AND FISCAL MANAGEMENT</b>				
Objective A: To promote increased efficiency, effectiveness, and responsiveness in the provision of government services by the City and County of Honolulu.				
Policy 1:	Maintain and adequately fund County government services at the level necessary to be effective.			X
Policy 2:	Promote alignment and consolidation of State and City functions whenever more efficient and effective delivery of government programs and services may be achieved.			X
Policy 3:	Ensure that government attitudes, actions, and services are sensitive to community needs and concerns, and held accountable to the public trust.			X
Policy 4:	Sufficiently fund and staff the timely preparation, maintenance, and update of public policies and plans to guide and coordinate City programs and regulatory responsibilities.			X
Policy 5:	Expand the adoption of technology across all City agencies to achieve greater transparency, efficiency, and accountability to the general public throughout government operations.			X

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Objective B: To ensure fiscal integrity, responsibility, and efficiency by the City and County government in carrying out its responsibilities.				
Policy 1:	Provide for a balanced budget.			X
Policy 2:	Allocate fiscal resources of the City and County to efficiently implement the policies of the General Plan and Development Plans.			X
Policy 3:	Ensure accountability and transparency in government operations.			X
Objective C: To achieve equitable outcomes for City programs, policies, and allocation of resources throughout the O’ahu community.				
Policy 1:	Promote policies that actively address and eliminate disparate outcomes for historically underserved communities.			X
Policy 2:	Seek equitable distribution of City investments towards promoting employment opportunities, infrastructure, and other community benefits appropriate to the community needs and proportionate to the population size.			X
Policy 3:	Promote adherence to processes that advance procedural, distributional, structural, intergenerational, and cultural equity within the City.			X
Policy 4:	Provide resources for City employees to understand and actively advance equity solutions within all agencies of City government.			X

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**Army Training Land Retention Community  
Engagement Activities - O'ahu**

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## Appendix L

# 2024 ARMY COMMUNITY ENGAGEMENTS RELATED TO LAND RETENTION

January		
Date	Command/Unit	Engagement
1/3/2024	USARPAC, USAG-HI PTA	PTA Site Visit, Chair Dawn Chang, AG and DLNR Staff
1/4/2024 – 1/5/2024	USAG-HI PTA	Live Fire Firefighter Training with Hawai'i County Fire Department
1/6/2024	USAG-HI	Mālama Mākua Cultural Access
1/8/2024	USINDOPACOM, USARPAC, USAG-HI	Briefing to State Legislature
1/9/2024	USAG-HI PTA	Attendance at the Hawai'i Island Chamber of Commerce Meeting
1/10/2024	USAG-HI	Native Hawaiian Advisory Council Meeting
1/13/2024	USAG-HI	Mākaha Service Project
1/16/2024	USINDOPACOM, USARPAC, USAG-HI/PTA	Bi-Annual Military Affairs Council State of Indo-Pacific Event
1/16/2024	USAG-HI PTA	Mauna Kea Soil and Water Conversation District Long Range Plan for Natural Resources Conservation Service (Waimea)
1/18/2024	USARPAC	Native Hawaiian Leaders Working Group Meeting
1/18/2024	USAG-HI	Outreach and consultation with Koa Mana/Glen Kila
1/25/2024	USAG-HI PTA	Waikōloa Firewise Community Meeting
1/26/2024	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.
1/26/2024	USAG-HI PTA	Hawai'i Leeward Planning Conference
1/27/2024	USAG-HI	Mālama Mākua Cultural Access
1/27/2024	USAG-HI PTA	Participated in the Wall that Heals Ceremony (Hilo)
1/30/2024 1/31/2024	USAG-HI PTA	International Invasive Species and Climate Change Conference

February		
Date	Command/Unit	Engagement
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 Kahoohoa Dialogue Sessions
2/10/2024	USAG-HI PTA, USARPAC, USARHAW	Kāhoohoa 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

<b>March</b>		
<b>Date</b>	<b>Command/Unit</b>	<b>Engagement</b>
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 Kaouiwi (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	Palikea 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 3/17/2024	USAG-HI	Mākua Makahiki Closing Ceremony – Mālama Mākua Cultural Access (Overnight)
3/17/2024 3/18/2024	USAG-HI DPW ENV	Annual Integrated Natural Resources Management Plan meetings with federal, state and local natural resource partners.
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 Mokolē’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

<b>June</b>		
<b>Date</b>	<b>Command/Unit</b>	<b>Engagement</b>
<b>6/7/2024</b>	USAG-HI, USARPAC	Publication of Oahu DEIS
<b>6/8/2024</b>	HQDA, USARPAC	Hui Kiolo: Wai’anae Moku Kūpuna Council Pentagon Meetings
<b>6/10/2024</b>	USARPAC	Meeting with Laurie Moore and John Greene, DBEDT Military and Community Relations Office
<b>6/11/2024</b>	USAG-HI	Engagement with Hawaiian Civic Club of Wahiawā and ASD Brendan Owens
<b>6/12/2024</b>	USAG-HI	Meeting with DLNR SHPD Staff and DLNR Chair Dawn Chang
<b>6/13/2024</b>	USARPAC	Ko’olauloa Neighborhood Board Meeting - ATLR
<b>6/14/2024</b>	USARPAC	ATLR Delivery of O’ahu DEIS Informational Packets to State Legislators
<b>6/17/2024</b>	USARPAC	Wahiawā-Whitmore Village Neighborhood Board Meeting - ATLR
<b>6/17/2024</b> – <b>6/21/2024</b>	USAG-HI PTA	Multiple Fire Fighter Training with 297th Engineer Det
<b>6/18/2024</b>	USAG-HI PTA	Mauna Kea Watershed Alliance Partnership Meeting
<b>6/18/2024</b>	USARPAC	Nānākuli-Mā’ili Neighborhood Board Meeting - ATLR
<b>6/18/2024</b>	USARPAC	ATLR Delivery of O’ahu DEIS Informational Packets to County and Congressional Representatives
<b>6/20/2024</b>	USAG-HI PTA	PTA access for Stewardship /Summer Solstice Cultural Ceremony at Pu’u Koli with Kalani Flores
<b>6/21/2024</b>	USARPAC	Congressional STAFFDEL ATLR Briefing
<b>6/21/2024</b>	USAG-HI PTA	STAFFDEL Army Caucus site visit to PTA
<b>6/24/2024</b>	USAG-HI	Consultation meeting with ‘Aha Kūkaniloko
<b>6/25/2024</b>	USARPAC	North Shore Neighborhood Board Meeting - ATLR
<b>6/26/2024</b>	USARPAC, USAG-HI PTA	PTA Site Visit, Board of Land and Natural Resources Member, Ms. Aimee Barnes
<b>6/27/2024</b>	USAG-HI PTA	Waikōloa Firewise Community Meeting
<b>6/28/2024</b>	USAG-HI PTA	PTA firefighters taught basic Fire Fighting Skills with Ho’omau Fire Academy
<b>6/30/2024</b>	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>		
<b>Date</b>	<b>Command/Unit</b>	<b>Engagement</b>
<b>9/4/2024</b>	USARPAC, USARHAW, USAG-HI/PTA	Kāhoahoa Meeting
<b>9/7/2024</b>	USAG-HI	Protect & Preserve HedGar ICA Check/ Ka‘ala Volunteer Trip
<b>9/10/2024</b>	USAG-HI	Mākaha Volunteer Trip
<b>9/11/2024</b>	USAG-HI	Moanalua Valley Community Association Meeting
<b>9/14/2024</b>	USAG-HI	Mālama Mākua Cultural Access
<b>9/16/2024</b>	OSD REPI	REPI Sync with University of Hawai‘i on future opportunities
<b>9/18/2024</b>	USAG-HI	Native Hawaiian Advisory Council Luncheon (NHAC)
<b>9/19/2024</b>	USAG-HI	Engagement with Waianae Moku Kūpuna Council, Mālama Mākua, BG Okamura, COL Sullivan regarding planting proposals at MMR.
<b>9/21/2024</b>	USAG-HI DFMWR	Mauna Kea Watershed Alliance Partners Meeting

<b>October</b>		
<b>Date</b>	<b>Command/Unit</b>	<b>Engagement</b>
<b>10/2/2024 – 10/5/2024</b>	USINDOPACOM, USARPAC	2024 Annual Hawaii Executive Conference
<b>10/3/2024</b>	USARPAC	ATLR Information briefing with Governor Green Staff
<b>10/3/2024</b>	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
<b>10/9/2024</b>	USINDOPACOM USARPAC, USARHAW, USAG-HI/PTA	Kāhoahoa Meeting
<b>10/9/2024</b>	USAG-HI	Introduction to Hawai‘i Conservation Workshop with Mililani High School Students
<b>10/12/2024</b>	USAG-HI	National Public Land’s Day (NPLD) Native Hawaiian Interpretive Garden Renovation
<b>10/15/2024</b>	USARPAC	ATLR Meeting – Leimana DaMate (Aha Moku Council)
<b>10/16/2024</b>	USACE	Restoration Advisory Board (RAB) for former Waikōloa Manuever Area at Mānā Christian ‘Ohana in Waimea
<b>10/17/2024</b>	USARPAC	ATLR Meeting – OHA Trustees: Kaiali‘i Kahele (Hawaii Island), Brickwood Galuteria (At-Large) and Keoni Souza (At-Large)
<b>10/18/2024</b>	USARPAC	ATLR information briefing – Mehana Hind (CNHA)
<b>10/23/2024 – 10/24/2024</b>	USAG-HI	Ka‘ala Volunteer Trip with veteran volunteers
<b>10/26/2024</b>	USAG-HI	Ka‘ala Volunteer Trip with Miliani High School Hui Mālama
<b>10/28/2024</b>	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

<b>December</b>		
<b>Date</b>	<b>Command/Unit</b>	<b>Engagement</b>
<b>12/3/2024</b>	USINDOPACOM USARPAC	Hawai‘i State Legislature Visit to USINDOPACOM
<b>12/4/2024</b>	USAG-HI	Ka‘ala Volunteer Trip with students from Wai‘anae Intermediate School
<b>12/4/2024</b>	USINDOPACOM, USAG-HI PTA	Institute For Defense Analyses/ Hawaii Economic Impact Study Meeting
<b>12/7/2024</b>	USAG-HI	Mālama Mākua Cultural Access
<b>12/10/2024</b>	USAG-HI	Kalua‘a Volunteer Trip
<b>12/11/2024</b>	USINDOPACOM, USARPAC, USAG-HI/PTA	Kahoahoa – “Cultural Sites & Stewardship” Working Group Meeting
<b>12/11/2024</b>	USINDOPACOM, USARPAC, USAG-HI/PTA	Kahoahoa – “Education & Community Engagement” Working Group Meeting
<b>12/11/2024</b>	USAG-HI	Native Hawaiian Advisory Council Meeting
<b>12/13/2024</b>	USARPAC	ATLR Briefing for Mr. Kali Watson (DHHL Director/Chairman) and Staff
<b>12/17/2024</b>	USAG-HI	Kahanahāiki Volunteer Trip
<b>12/29/2024</b>	USAG-HI	Mālama Mākua Cultural Access

<b>2024 Other Community Coordination/Outreach</b>		
<b>Date</b>	<b>Command/Unit</b>	<b>Engagement</b>
<b>Monthly</b>	USARPAC, USARHAW, USAG-HI	‘Ohana Partner Network – Neighborhood Board Meetings Brigade-level leaders are liaisons with 10 key community neighborhood boards.
<b>Aug 2023 – Present</b>	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).
<b>Every Monday</b>	USACE Recovery Field Office Maui	Mayor’s (Maui County) Advisory Council meetings: includes RFO Commander LTC Collin Jones, Mayor Bissen, and various other advisors
<b>Every Wednesday</b>	USACE Recovery Field Office Maui	Lahaina Community Meeting: includes RFO Commander LTC Collins Jones, RFO staff, and Lahaina community.
<b>SEP-DEC</b>	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.
<b>SEP-OCT</b>	U.S. Army Museum of Hawai‘i	Kukalepa Memorial Refurbishment Project at the U.S. Army Museum of Hawai‘i at Fort DeRussy
<b>SEP-OCT</b>	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