

QUESTIONS AND ANSWERS

Record of Decision on Army Training Land Retention of State Lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Makua Military Reservation, Island of O‘ahu, Hawai‘i

August 7, 2025

Q-1. What are Kahuku Training Area (KTA), Kawaihoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR), and what are they used for?

A-1. KTA, Poamoho, and MMR are located on the island of O‘ahu in the State of Hawai‘i. KTA encompasses approximately 9,480 acres of land, of which approximately 1,150 acres are state-owned. State-owned land at KTA is primarily used for high-density helicopter training and to support large-scale ground maneuver training that occurs on adjacent federal land. Poamoho includes approximately 4,390 acres, the entirety of which is state-owned land. Poamoho provides airspace over ravines and deep vegetation, and offers realistic helicopter training for combat readiness. MMR encompasses approximately 4,190 acres of land, of which approximately 782 acres are state-owned. State-owned land at MMR is used for ground maneuver and unmanned aerial vehicle training, as well as for wildland fire suppression and security activities.

Q-2. What is the history of military training at KTA, Poamoho, and MMR, and how would these training areas support future military needs?

A-2. KTA and Poamoho have been military training sites since at least the 1960s, while MMR has been used by the military since the 1920s. All training areas continue to be utilized by Active Army units and other military entities, such as the U.S. Marine Corps and the Hawai‘i Army National Guard. Since 1964, the Army has leased approximately 6,322 acres of state-owned lands at these training sites. The 65-year leases expire in 2029. The Army seeks to retain certain lands to ensure mission readiness and deployment preparedness. Military units using these training sites on O‘ahu must be ready to deploy and perform combat operations to support the U.S. Indo-Pacific Command (USINDOPACOM) strategy.

Q-3. Why was an Environmental Impact Statement (EIS) prepared?

A-3. The National Environmental Policy Act of 1969 (NEPA) requires federal agencies to examine the potential effects of their proposed actions on the human environment.

Under Hawai‘i Revised Statutes (HRS) Chapter 343 and Hawai‘i Administrative Rules (HAR) Chapter 11-200.1, collectively referred to as the Hawai‘i Environmental Policy Act (HEPA), use of state lands requires environmental disclosure. An EIS-level analysis is being conducted in accordance with HAR Section 11-200.1-14(d)(2). The accepting authority (i.e., the Hawai‘i Department of Land and Natural Resources) determined that the Army’s proposed action may have a significant environmental effect.

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

Q-4. What is the proposed action and what alternatives were considered in the Final EIS?

A-4. The proposed action is to retain up to approximately 6,322 acres of state-owned lands at KTA, Poamoho, and MMR to support continued military training. The Final EIS evaluated 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); and

For MMR—(1) Full Retention (of approximately 782 acres); (2) Modified Retention (of approximately 572 acres); (3) Minimum Retention (of approximately 162 acres and 2.4 miles of select range roads and firebreak roads).

The Final EIS also analyzed the potential impacts of the No Action Alternative, under which Army use of the particular state-owned land would cease altogether when the lease expires in 2029.

Q-5. What is the purpose of and need for the proposed action?

A-5. The purpose of the proposed action is to retain areas for military training beyond the end of the current lease. 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 on O'ahu.

Q-6. What resource areas were analyzed in the Final EIS?

A-6. The Final EIS analyzed: land use; biological resources; historic and cultural resources; cultural practices; hazardous substances and hazardous wastes; air quality and greenhouse gases; noise; geology, topography, and soils; water resources; socioeconomics; environmental justice; transportation and traffic; and human health and safety. The Final EIS quantitatively and qualitatively analyzes and evaluates the potential environmental impacts of the proposed action.

The Final EIS was prepared according to certain, now-rescinded Executive Orders, and the Council on Environmental Quality's NEPA implementing regulations and the Army's NEPA implementing regulations, which are also now rescinded. Because analysis regarding greenhouse gases and environmental justice was already provided to the public for comment in the Draft EIS, such analysis was included in the Final EIS for transparency and continuity.

Q-7. Was the public involved during the EIS process?

A-7. Native Hawaiian Organizations, federal, state, and local agencies and officials, and other interested organizations and individuals were invited to participate in the public comment periods throughout the EIS process. The public comment process began with a 40-day scoping period from July 23, 2021, to September 1, 2021. On June 7, 2024, the Army published the Notice of Availability of the Draft EIS, which started the 60-day public comment period that ended on August 7, 2024. Throughout the EIS process, the Army conducted community outreach as part of the Army Training Land Retention Program and other activities.

Q-8. Why was a Record of Decision (ROD) prepared?

A-8. In accordance with now-rescinded Army NEPA regulations, the Army observed a 30-day waiting period after publication of the Final EIS, which occurred on April 18, 2025. After the waiting period, the Army selected an alternative for implementation. The ROD identifies the selected alternative and the basis for the Army's decision.

Q-9. What alternative did the Army select?

A-9. The Army identified Alternative 2 (Modified Retention) for KTA, and the No Action Alternative for Poamoho and MMR (the preferred alternative in the Final EIS), as the selected alternative.

Q-10. On what basis did the Army make its decision?

A-10. The Army's decision to select Alternative 2 for KTA and the No Action Alternative for Poamoho and MMR was based on consideration of the results of the analysis in the Final EIS, comments provided during the public comment and review periods, Army mission requirements, and an evaluation of the ability of each alternative to meet the purpose of and need for the proposed action.

Q-11. What resource areas may be significantly impacted from implementation of the selected alternative?

A-11. Significant beneficial impacts are expected for land not retained. Significant adverse impacts of the selected alternative are limited to land use.

Q-12. What mitigation measures will the Army implement?

A-12. For Alternative 2 at KTA, no mitigation measures are recommended beyond the existing management measures and acquisition at fair market value. No mitigation measures will be implemented for the No Action Alternative at Poamoho and MMR.

Q-13. What methods of land retention is the Army considering?

A-13. The Army will discuss with the state the most appropriate land retention method(s) for the 450 acres at KTA the Army will seek to retain.

Q-14. How does the Board of Land and Natural Resources' (BLNR's) decision to not accept the Final EIS impact the Army's ability to retain the state-owned land?

A-14. Title 10 of the U.S. Code identifies the Army's authorized methods of land retention, which include fee title, lease, and easement. The BLNR's decision not to accept the Final EIS reduced the likelihood that the Army would be able to retain the land through a lease. Given proper authority and funding, the Army may still seek to retain the land through either a fee simple purchase or exchange.

Q-15. How can the Army determine that its EIS is sufficient in terms of NEPA when the BLNR rejected it under HEPA?

A-15. NEPA and HEPA, while similar, are not the same. The Army finds that the Final EIS met the requirements of NEPA in both substance and procedure. The BLNR staff found that the Army's Final EIS did not address certain effects, and that the Army had not completed various inventories or studies. The BLNR staff determined that the BLNR could either accept or reject the Army's EIS under HEPA. The BLNR decided to reject it. Federal case law supports the idea that federal agencies' determinations regarding their NEPA documentation are entitled to deference. Federal agency decisions must be reasonable and well-explained. The Army maintains that its NEPA documentation and decision are legally sufficient.