

Environmental Assessment and
Finding of No Significant Impact

**IMPLEMENTATION OF THE
U.S. ARMY GARRISON, HAWAI'I
AND
U.S. ARMY GARRISON, PŌHAKULOA
INTEGRATED CULTURAL RESOURCES MANAGEMENT PLANS**

PREPARED FOR
U.S. ARMY GARRISON, HAWAI'I

PREPARED BY
COLORADO STATE UNIVERSITY
CENTER FOR ENVIRONMENTAL MANAGEMENT OF MILITARY LANDS
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September 2017

Finding of No Significant Impact
for Implementation of the U.S. Army Garrison, Hawai'i and
U.S. Army Garrison, Pōhakuloa
Integrated Cultural Resources Management Plans

AUTHORITY:

Pursuant to the National Environmental Policy Act of 1969, as amended (42 USC et seq.)(NEPA), the Council on Environmental Quality (CEQ) regulations for implementing NEPA (40 CFR 1500-1508), and the Final Rule on Environmental Analysis of Army Actions (32 CFR Part 651) an Environmental Assessment (EA) was prepared to analyze the potential for significant environmental impacts associated with the implementation of the United States Army Garrison, Hawai'i (USAG-HI) Integrated Cultural Resources Management Plan (ICRMP) and United States Army Garrison, Pōhakuloa (USAG-Pōhakuloa) ICRMP.

PROPOSED ACTION:

The Proposed Action, implementation of the USAG-HI and USAG-Pōhakuloa ICRMPs, is the preferred alternative. The purpose of the Proposed Action is to enable USAG-HI and USAG-Pōhakuloa to support the military mission by managing cultural resources in compliance with rules and regulations and in accordance with established practices of cultural resources management. The ICRMPs include goals and objectives for addressing specific cultural resources management needs and prioritize education and coordination with the many other programs and activities that may interact with cultural resources on USAG-HI and USAG-Pōhakuloa managed lands. Cultural resources management on USAG-HI and USAG-Pōhakuloa sub-installations is currently guided by existing Army guidance documents and federal laws and regulations.

The Department of Defense (DoD), the Department of the Army, USAG-HI and USAG-Pōhakuloa are required by Department of Defense Instruction (DoDI) 4715.16, Cultural Resources Management, and Army Regulation (AR) 200-1, Environmental Protection and Enhancement, to implement and maintain ICRMPs. An ICRMP is an instrument for compliance with the statutory management requirements of applicable statutes and regulations and provides specific procedures to comprehensively manage cultural resources while sustaining the Army's capability to successfully achieve its mission. An ICRMP is an integral part of an installation's master plan.

ALTERNATIVES CONSIDERED:

No alternatives other than the Proposed Action would satisfy the purpose and need of the proposed project as preparation and full implementation of ICRMPs are required by DoDI 4715.16 and AR 200-1. Other alternatives, including partial implementation of an ICRMP, were dismissed in favor of complying with DoD and Army regulations. Therefore, no additional alternatives except the "No Action" alternative were considered in the EA.

PUBLIC REVIEW:

This final Finding of No Significant Impact (FNSI) has been issued in conjunction with the EA and incorporates it by reference. These documents, along with the ICRMPs, were available for a 30-day public review and comment period beginning 8 November 2017 with comments accepted through 8 December 2017.

By the end of the public comment period, 38 individual, organization, or agency comments were received. The comments fell into four general categories: 1) non-substantive, 2) requesting environmental impact statement, 3) corrections and/or suggestions to the ICRMP, and; 4) general analysis. The comments are summarized in the Appendix to this FNSI. No substantive issues beyond those already considered were identified through public comment. The USAG-HI fully considered and responded to comments received.

SUMMARY OF FINDINGS:

Based upon the analysis contained in the EA, implementation of the Proposed Action would have no significant direct, indirect, or cumulative adverse impacts on environmental or socioeconomic resources. Impacts associated with the Proposed Action were found to be temporary and negligible in context and intensity. Implementation of the ICRMPs would provide long-term beneficial impacts to historic and cultural resources by ensuring compliance with rules and regulations in support of the military mission; providing direction and guidance for management activities; and improving the coordination process between the Cultural Resources Section and project proponents.

The legal requirements of DoDI 4715.6 and AR 200-1 mandate that Army installations develop and implement an ICRMP for use as a planning tool and as the guiding document for cultural resources management decisions. The ICRMPs articulate management procedures and long-range goals for cultural resources on USAG-HI and USAG-Pōhakuloa managed lands.

CONCLUSION:

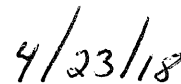
Based on information compiled and analyzed during preparation of the EA, the USAG-HI finds that the Proposed Action to implement the USAG-HI and USAG-Pōhakuloa ICRMPs would not result in significant impacts to either the man-made or natural environment. Therefore, an environmental impact statement is not required.

Approved By:



STEPHEN E. DAWSON

Colonel, U.S. Army Garrison, Hawai'i
Commanding



Date

FNSI APPENDIX					
USAG-HI Public Comment Tracker - Implementing the Integrated Cultural Resources Management Plans EA / draft FNSI					
Initial Standard Response for comments sent via email: "This email confirms receipt of your comments on the proposed implementation of the Integrated Cultural Resources Management Plans. We greatly appreciate you taking time to review the documents and provide your feedback. We value the community's input and will not make a final decision on the implementation of the plans until after reviewing public comments."					
#	Date of Comment	Commenter Name	Organization	Comment [unless otherwise stated, comments emailed to PAO Box]	RESPONSE
1	15-Nov	Sharon Prater	Self	This desecration of pohakulooa must be stopped! It is dangerous to people and complete disregard for Hawaii culture.Complete disregard for our environment. People do care. This bombardment of pohakulooa is like the worst nightmare happening in paradise stop!!!!!!	The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.
2	15-Nov	Donna Grabow	Self	My name is Donna Grabow, a citizen of East Hawai'i, requesting the US Army officials to schedule a public meeting with the community to learn about Pohakulooa Training Area.	The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process. Additionally, your request to meet to learn more about Pohakulooa Training Area was shared with the Army leadership there.
3	24-Nov	Michael Reimer	Self	The cultural management plan for public comment is available at the Army Garrison website. My server alerts me that this site is improperly configured and states data can be stolen and therefore does not allow connection with this site. The deadline for comment must be extended until some reasonable time after this site is properly configured. From a newspaper report November 11, 2017 (Hawaii Tribune Herald) the article states “The general objectives... are to eliminate impacts to the military missions arising from cultural resources.” That statement makes the “no significant impact” conclusion bogus. It is the cultural resources that must be primarily protected from impact. Given the stated objective, a full environmental impact statement is now obviously required.	11/24 - PAO emailed - Aloha Mr. Reimer, Mahalo for your email. I will share your comments with our National Enviornmental Policy Act program staff. In regard to accessing the website, please be assured that site is properly configured, and your data will not be stolen. Some users have issues because their browsers are not configured to trust the Department of Defense certificate. I've attached information and solutions regarding that issue. Alternatively if you'd prefer, I can email you the document. USAG-HI and USAG-Pohakulooa shall continue to comply with federal and Army regulatory requirements, including Army Regulation 200-1, in which it states that the major goal of Army cultural resources management programs is to protect against encumbrances to the mission and effectively manage cultural resources. The analyses in the final EA (Chapter 4: Affected Environment and Environmental Consequences) indicate that implementation of the ICRMPs would not have a significant effect on the natural or human environment, therefore an EIS is not warranted. Any future projects that may impact resources will undergo their own level of analysis as required by NEPA. The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.
4	25-Nov	Whitney Velez	self	I am a Waimea resident and recently read that the Army is seeking public comment on PTA and cultural resource management there. I would like to add my voice to those calling for an END TO BOMBING at PTA. I do not know what sort of weapons are being tested but we all hear what sounds like bombs being dropped in this archaeologically and environmentally sensitive area. Please stop. In addition, I would ask that the Army seek partners in the community who would be willing to help manage cultural resources and allow access for people trying to practice their religion and reinforce their connection to these lands, as well as giving basic respect to these precious cultural and environmental resources.	USAG-HI and USAG-Pohakalooa conducted an oral history study of Pohakalooa Training Center in 2002 and an Ethnographic Study in 2012 to identify Traditional Cultural Properties (TCPs) and properties of religious and cultural significance to Native Hawaiians, the results of which are incorporated in the ICRMP, and the Army continues to work with the community to identify the sacred sites and sacred landscapes at Pohakulooa Training Center. The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.
5	2-Dec	Mark Gordon	JM Decker Group/Self	Hi I appreciate the opportunity to comment on the Subject ICRMP for US Army Garrison Pohakulooa Overall, from a cursory review of the Subject Plan, I believe the Army has thorough SOPs if Hawaiian cultural, burial and sacred sites are located at Pohakulooa, Kawaihae or Kilauea Military Camp. Just a few comments and observations: * Continue to avoid using any areas for training and use of vehicles or other equipment on sites where archaeological, cultural, burial and sacred sites have been located. If possible, continue to perform training and related activities away from these areas. Also avoid any type of contamination in or use of these areas. * Before using a new area for training, possible construction or other activities, perform a thorough archaeological survey working with the OHA and other similar Agencies. * Continue to comply with all Federal, Native and other Regulations and requirements pertinent to the ICRMP Thank you for allowing me to share my comments. Mark Gordon, CHMM Environmental, Health and Safety Manager, JM Decker Group, Hawaii Resident - Waikoloa, HI.	The Army strives to protect cultural sites through site protection measures, avoidance, and changes to training scenarios where practicable. The Army shall continue to assess impacts resulting from federal undertakings consistent with the National Environmental Policy Act, the National Historic Preservation Act, the Archaeological Resources Protection Act, and the Native American Graves Protection and Repatriation Act. Likewise, the Army has, and will continue, to conduct archaeological surveys to identify cultural resources present on Army-controlled lands wherever health and safety requirements can be met. The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.

6	3-Dec	Mike Reimer	self	<p>COMMENTARY ON 2017 ICRMP</p> <p>By Michael Reimer</p> <p>12/03/2017</p> <p>GeoMike5@att.net < Caution-mailto:GeoMike5@att.net > c/o Satz</p> <p>256 Hualalai Rd.</p> <p>Kailua-Kona, HI 96740</p> <p>This is a commentary on the need to have a full environmental impact statement (EIS) prepared for the current 2017 Integrated Cultural Resources Management Plan (ICRMP) now under review.</p> <p>What has been prepared seems but another in a series of cultural management plans. It continues in the tradition of giving the manifestation of caring about preservation of cultural resources and artifacts when in actuality, it is more a pretension when placed in the context of what West Hawaii Today (WHT) included in its news article of the Army stated objectives on this topic.</p> <p>From WHT November 11, 2017: The general objectives of the cultural resources management program are to eliminate impacts to the military missions arising from cultural resources issues, to meet compliance requirements in conjunction with other garrison offices and to identify, enhance and implement program efficiencies.</p> <p>A simple change in word position would make all the difference. Reverse the positions of military missions and cultural resource issues.</p> <p>Then, of course, realistically move forward from that position and not give the appearance of agonizing over minimum compliance requirements but make the effort to exceed them. To be sincere about addressing cultural issues, the objectives of that plan and the military training mission must be placed at least on equal footing; one objective cannot be placed at a higher level than the other. The plans should mature, excel, and become a continuing process.</p> <p>Is it even possible for the military and culture provided by the land it occupies to coexist? Yes, certainly. In fact, cultural preservation should be part of the military training. It does not take a long past look at history to see this possibility. We recall in WWII that there was a special section of the military to try to protect culture in Europe; the stolen art work comes to mind. But that is contrasted with the Gulf War when civilian looting of artifacts from cultural museums happened when there should have been the protection of occupancy.</p> <p>General Dwight D. Eisenhower, in a message to troops on the eve of the Normandy invasion stated,</p> <p>"Shortly we will be fighting our way across the Continent of Europe in battles designed to preserve our civilization. Inevitably, in the path of our advance will be found historical monuments and cultural centers that symbolize to the world all that we are fighting to preserve. It is the responsibility of every commander to protect and preserve these monuments whenever possible."</p>	<p>The analyses in the final EA (Chapter 4: Affected Environment and Environmental Consequences) indicate that implementation of the ICRMPs would not have a significant effect on the natural or human environment, therefore an EIS is not warranted. The EA concludes that there will be no impact or a beneficial impact to a range of environmental factors from implementation of the ICRMP. Any future projects that may impact resources will undergo their own level of analysis as required by NEPA.</p> <p>USAG-HI and USAG-Pohakuloa shall continue to comply with federal and Army regulatory requirements, including Army Regulation 200-1, in which it states that the major goal of Army cultural resources management programs is to protect against encumbrances to the mission and effectively manage cultural resources.</p> <p>The Army's mission is the defense of the Nation, USAG-Pohakuloa's mission is to train military members to carry out that mission, and it is the National Park Service's mission to preserve. The Army does make efforts to revise planned projects to avoid adverse effects to cultural resources when feasible, and all units that come to train at PTA receive a briefing on the significance of the area and the sensitivity of the resources.</p> <p>The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.</p>
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7	3-Dec	Cory Harden	self	<p>comments by Cory Harden, Hilo 333cory@gmail.com</p> <p>Integrated Cultural Resources Management Plan with Environmental Assessment and Draft Finding of No Significant Impact, 2017 U.S. Army Garrison, Pōhakuloa, Hawaiʻi Island</p> <p>https://www.garrison.hawaii.army.mil/NEPA/Documents/USAG-P_ICRMP%20&%20EA_Draft%20FNSI_revised.pdf</p> <p>for citizen forum 5 PM Thursday, November 30, 2017, Aupuni Center, Hilo</p> <p>The plan has three major flaws and should be re-written.</p> <p>First, the plan turns a blind eye to the illegal takeover of the nation of Hawaiʻi.</p> <p>The history section, heavily sanitized, says “The Hawaiian monarchy was overthrown and the subsequent republican government appealed to the U.S. for annexation, eventually succeeding in August 1898.” (p. 36) But the plan should say that U.S. troops assisted in the takeover, the nation of Hawaiʻi never agreed to annexation, and the U.S. is an illegal occupier.</p> <p>The second flaw is that the plan also turns a blind eye to the military’s destruction of native Hawaiian culture, by actions directly affecting the culture, and also by destruction of the natural world to which the culture is inextricably bound. The plan says nothing about the radioactivity in Pearl Harbor, tons of hazardous old ordnance left on land and in the sea, the threat to the aquifer from Red Hill fuel tanks, and much, much more.</p> <p>Some of the most brazen sanitized history describes tests in ‘Ola’a Forest Reserve in 1964 and an upland area in 1966. (p. 39). The history fails to reveal that germ warfare agents, hallucinogenic benzillic acid, and sarin were used, and lies were told to the public to cover up.</p> <p>The third flaw is that surveys for cultural resources are inadequate, leaving the plan with no valid basis.</p> <ul style="list-style-type: none">• only one-fifth of the Pohakuloa impact area has been surveyed for cultural resources (p. 48)• half of non-impact areas at Pohakuloa have not been surveyed--about 62,000 acres (pp. 47 and 48)• the plan questions whether past surveys were “ ‘reasonable and in good faith’ ” (p. 52)• the plan notes that older surveys need updating because they are less thorough than modern surveys (p. 84)• even with all these inadequacies, surveys have found almost 1,200 archaeological sites, indicating many sites remain undiscovered <p>Thorough surveys should be done for the entire Pohakuloa area, then the plan should be re-written based on the updated information.</p> <p>...</p> <p>The mindset and actions required to achieve death, destruction, and domination pull us away from nurturing the finely woven threads that connect us to the natural world and our cultural heritage. If we lose that connection, who won?</p>	<p>The ICRMP is now revised to include Public Law 103-150, which addresses overthrow of the Kingdom of Hawaii in 1893. The Army is dedicated to fulfilling its responsibilities under the National Historic Preservation Act, the American Indian Religious Freedom Act, the Archaeological Resources Protection Act, and the Native American Graves Protection and Repatriation Act. The Army has, and will continue, to conduct archaeological surveys to identify cultural resources present on Army-controlled lands wherever health and safety requirements can be met.</p> <p>The Army notes your concern regarding germ warfare and radioactivity but they are outside the scope of this EA.</p> <p>The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.</p>
8	3-Dec	Clare Loprinzi	self	<p>Aloha kakou,</p> <p>clare loprinzi traditional midwife</p> <p>Caution-www.mammaprimitiva.com < Caution-http://www.mammaprimitiva.com ></p> <p>birth sovereignty advisor</p> <p>Birth Sovereignty supports basic public health measures and projects that create sovereignty in birth choices, health care access and environmental health as a vital component of broader cultural, social, economic and environmental sovereignty and justice issues.</p>	<p>The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.</p>
9	5-Dec	Gary Harrold	self	<p>Mailed to DPW ENV Division - Dear Directorate of Public Works, As you well know, the 132,000 acre Pohakuloa Training Area has been devastated for years. Live fire, depleted uranium, oxide dust, military vehicular and airborne impact, explosions, ordinances, construction of facilities, runways, roads and bombs have deleted *forever* sacred Hawaiian cultural go-to prayer sites. As a lifetime member and Executive Committee member of the Hawaii Island chapter of Sierra Club, I deplore the geologic, ecological, botanical and zoological destruction of PTA. Everyone in the club stands united on this issue. The US Army continues to restrict native people, and the tax-paying public, from access to archaeological and spiritual locations within PTA. This is unacceptable. The Army - and the DoD, in total- needs to take responsibility for horrid contamination of radioactivity on Pohakuloa and over 700 toxic sites at Pearl Harbor. The military MUST clean up their mess - including subterranean explosives on Kahoʻolawe. The public, you and me included, have to eat out of a dirty dish; military-originated toxicity is omnipresent throughout the state of Hawaiʻi. Thank you for listening to my concerns. Finally, do you want your children to live surrounded by such immune system-destroying pollution? Gary Harrold November 30, 2017</p>	<p>The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.</p>

10	5-Dec	Jim Albertini	Malu 'Aina Center for Non-violent Education & Action/self	<p>Please include this for the record ----- testimony calling for a full EIS, not simply an EA on U.S. Army Garrison-Pohakuloa 2017 Draft Integrated Cultural Resource Management Plan.</p> <p>Please initiate a Full Environmental Impact Statement on military impacts to Hawaiian Cultural resources at Pohakuloa.</p> <p>Please include this video of my testimony at a People's hearing on the issues.</p> <p>Caution-http://www.bigislandvideonews.com/2017/12/01/video-jim-albertini-testifies-about-pohakuloa-ea/ <</p> <p>Caution-http://www.bigislandvideonews.com/2017/12/01/video-jim-albertini-testifies-about-pohakuloa-ea/ > Also include for the record the complete testimony of the people's hearing on the issues.Testimony and Comments on The Integrated Cultural Resource Management Plan for Pohakuloa Training Ar < Caution-https://www.youtube.com/watch?v=WmEBdyYchg&feature=youtu.be > In short you need to disclose how many and what kinds of live-rounds are fired annually at PTA, including if B-1, B-2, and B-52 bombers still fly from Guam, Louisiana, and Missouri to bomb at Pohakuloa. List all the other kind of firing systems and the number and kinds of weapons used at PTA. Answer questions submitted in writing to LT Col. Marquez on Sept. 30, 2016 which to date I have not received any answers. Cover letter 9/30/16 of packet handed to Lt.Col. Marquez is below.</p> <p>Malu 'Aina Center for Non-violent Education & Action</p> <p>Christopher M. Marquez</p> <p>LTC, FA</p> <p>Commanding Officer</p> <p>U.S. Army Garrison</p> <p>Pohakuloa Training Area</p> <p>P.O. Box 4607</p> <p>Hilo, Hawaii 96720-0607</p> <p>September 30, 2016</p> <p>Aloha LTC Marquez,</p> <p>Attached is a (26 page) packet of background material and questions presented to several former commanding officers of this command, some dating back to 2007 that have yet to be answered. I hope that finally you will provide answers. As citizens, we deserve answers.</p> <p>The following three points represent a summary of deep concerns not only representing our organization but many others on Hawaii Island: A) We consider the Army's occupation of PTA illegal and will continue to work toward returning the entire area back to Kanaka Maoli sovereignty; B) We also consider military continuing bombing and live fire at PTA desecration of the land, grotesque destruction of the environment, and violation of the trust agreement implicit in the lease with the DLNR; C) In the meantime, we demand and expect the Army to respect the 2008 County of Hawaii Resolution 639-08, especially the points regarding stopping live fire, setting up a transparent and high-tech permanent monitoring system and thorough cleanup of Depleted Uranium(DU) and other toxic chemicals already present...</p> <p>Thank you for your assistance.</p>	<p>12/6 Mr. Albertini,</p> <p>This email confirms receipt of your comments on the proposed implementation of the Integrated Cultural Resources Management Plans. We greatly appreciate you taking time to review the documents and provide your feedback. We value the community's input and will not make a final decision on the implementation of the plans until after reviewing public comments.</p> <p>As a reminder, we are accepting written comments via email or mail during this public comment period. If you need additional time to transcribe the content of your video so that it may be submitted as written comment, please email it by close of business Monday, December 11, 2017 to usarmy.wheeler.id-pacific.list.community-relations@mail.mil.</p> <p>Mahalo,Lisa Graham</p> <p>NEPA Program Manager</p> <p>U.S. Army Garrison Hawaii</p> <p>The ICRMP is now revised to include Public Law 103-150, which addresses overthrow of the Kingdom of Hawaii in 1893. The 2008 Hawaii Resolution, however, recognizes that it has no binding or legal effect on the Army. The Army and other military services have an ongoing need to conduct live-fire training at Pohakaloa Training Center. The Army remains committed to continuing to protect the health and safety of people in surrounding communities, Soldiers and their Families, and the civilian work force who live near and work at PTA. To that end, the Army is continuing to work with the State of Hawaii and other federal agencies to monitor the land for potential transport of pollutants caused by military actions.</p> <p>The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.</p>
11	5-Dec	Sharon Rudolph	self	<p>Aloha!</p> <p>RE: U.S. Army Garrison-Pohakuloa 2017 Draft Integrated Cultural Resource Management Plan /Comment. Please initiate a Full Environmental Impact Statement on military impacts to Hawaiian Cultural resources at Pohakuloa. And please clean up the depleted uranium.. or at least do some real air monitoring. Mahalo/Thank you, Shannon Rudolph P. O. 243 Holualoa, Hi. 96725</p>	<p>The analyses in the final EA (Chapter 4: Affected Environment and Environmental Consequences) indicate that implementation of the ICRMPs would not have a significant effect on the natural or human environment, therefore an EIS is not warranted. The Army remains committed to continuing to protect the health and safety of people in surrounding communities, Soldiers and their Families, and the civilian work force who live near and work at PTA. To that end, the Army is continuing to work with the State of Hawaii and other federal agencies to monitor the land for potential transport of pollutants caused by military actions. The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.</p>
12	5-Dec	Julie Paul	self	<p>Aloha!</p> <p>RE: U.S. Army Garrison-Pohakuloa 2017 Draft Integrated Cultural Resource Management Plan /Comment.</p> <p>Please initiate a Full Environmental Impact Statement on military impacts to Hawaiian Cultural resources at Pohakuloa.</p> <p>Mahalo/Thank you,</p> <p>Julie Paul, CIPS, CRS, ABR, SRS</p> <p>RB 15523</p> <p>Pahoa Properties LLC</p>	<p>The analyses in the final EA (Chapter 4: Affected Environment and Environmental Consequences) indicate that implementation of the ICRMPs would not have a significant effect on the natural or human environment, therefore an EIS is not warranted.</p> <p>The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.</p>
13	6-Dec	Sharron Cushman	self	<p>Aloha, RE: U.S. Army Garrison-Pohakuloa 2017 Draft Integrated Cultural Resource Management Plan /Comment.Please initiate a Full Environmental Impact Statement on military impacts to Hawaiian Cultural resources at Pohakuloa. I am extremely concerned how this area has not been protected.Mahalo,</p> <p>Sharron Cushman</p>	<p>The analyses in the final EA (Chapter 4: Affected Environment and Environmental Consequences) indicate that implementation of the ICRMPs would not have a significant effect on the natural or human environment, therefore an EIS is not warranted.</p> <p>The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.</p>

14	6-Dec	Nedi McKnight	self	<p>Gentlepersons,</p> <p>I write as a concerned citizen and resident of Hawai'i Island. I have a few questions and comments.What is going on at Pohakuloa? Why is there a need to relentlessly bomb a pristine Hawaiian island and U.S. state?</p> <p>With all of the technologies, military actions and available landscapes in the U.S. and abroad, why is the military focused on harmful practice in an ecologically and culturally sensitive area? Does the Army even know what the actual impacts are?</p> <p>In reaching out to my legislators, I have been informed that it is important for the army to train here to "prepare for a potential conflict with China." What kind of nonsense is this? It is bad enough to own property and pay a mortgage on the front lines of an unfortunate and totally avoidable conflict with nuclear armed North Korea, but now we are being told that have to allow the destruction of pristine landscape and Hawaiian culture in order to prepare for a World War? I sincerely doubt the residents of Hawai'i will fair very well if we go to war with China. So, why is practice necessary here on the Big Island? On this precious jewel in the Pacific? In reality, the activities of the military in Hawai'i endanger the civilian population, making us a worthy target, and much less safe than if the bases and practice areas were elsewhere.</p> <p>Hawaiians are deeply connected to the natural world. Bombing the bases of the mountain that they consider to be their ancestor, destroying archaeological and burial sites and residues of chemical pollution qualifies as destruction of Native Hawaiian Culture. It's heartbreaking and shameful. One doesn't have to be of Hawaiian blood or born on this island to understand that what the military is doing in Pohakuloa is totally wrong.I, like most residents, am very concerned with the possibly contamination by depleted uranium. If dust and particulates are being aerosolized by current bombing, what is to prevent the contamination from being picked up by wind and water? There are thousands of people living downwind. I drive the upper road in Waimea all the time and can't help but wonder; what kind of contamination am I breathing? Our primary agricultural lands are in Waimea. How can you assure us that our food supply is safe?</p> <p>I urge you to reconsider your plan of action, insist on more environmental and cultural studies and preserve the Pohakuloa area for past and future generations.</p> <p>Sincerely, Nedi McKnight Oahu, Hawai'i</p>	<p>The Army and other military services have an ongoing need to conduct live-fire training at Pohakaloa Training Center. The Army remains committed to continuing to protect the health and safety of people in surrounding communities, Soldiers and their Families, and the civilian work force who live near and work at PTA. To that end, the Army is continuing to work with the State of Hawaii and other federal agencies to monitor the land for potential transport of pollutants caused by military actions.</p> <p>The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.</p>
15	6-Dec	Julie Stowell	self	<p>Aloha,</p> <p>RE: U.S. Army Garrison-Pohakuloa 2017 Draft Integrated Cultural Resource Management Plan /Comment.Please initiate a Full Environmental Impact Statement on military impacts to Hawaiian Cultural resources at Pohakuloa.</p> <p>Mahalo, Julie Stowell</p>	<p>The analyses in the final EA (Chapter 4: Affected Environment and Environmental Consequences) indicate that implementation of the ICRMPs would not have a significant effect on the natural or human environment, therefore an EIS is not warranted.</p> <p>The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.</p>
16	6-Dec	Patricia Ikeda	self	<p>Please initiate a full environmental impact statement on military impacts on Hawaiian cultural sites, resources and critical habitat at Pohakuloa</p> <p>Military camp.</p> <p>Mahalo!</p> <p>~Patricia Ikeda~</p>	<p>The analyses in the final EA (Chapter 4: Affected Environment and Environmental Consequences) indicate that implementation of the ICRMPs would not have a significant effect on the natural or human environment, therefore an EIS is not warranted.</p> <p>The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.</p>
17	6-Dec	Amanda Rieux	self	<p>To Whom it May Concern,</p> <p>Director of Public Works at the US Army Garrison,</p> <p>I am writing today to request that do do everything in your power to be sure that there is a full EIS for Pohakuloa's Cultural resource Management Plan. Only a fraction of the sites at Pohakuloa have had full archaeological survey.Moreover as a citizen of Hawaii Island, I am very concerned about the environmental and health impacts that live fire bombing conducted there pose to all living things on our island.I ask that you let me know what action you have taken on this. Please use this email address to communicate about your actions on this issue with me.Thank you for your time and your integrity in dealing with this for the best, most farsighted outcome.</p>	<p>The analyses in the final EA (Chapter 4: Affected Environment and Environmental Consequences) indicate that implementation of the ICRMPs would not have a significant effect on the natural or human environment, therefore an EIS is not warranted.</p> <p>The Army and other military services have an ongoing need to conduct live-fire training at Pohakaloa Training Center. The Army remains committed to continuing to protect the health and safety of people in surrounding communities, Soldiers and their Families, and the civilian work force who live near and work at PTA. To that end, the Army is continuing to work with the State of Hawaii and other federal agencies to monitor the land for potential transport of pollutants caused by military actions.</p> <p>The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.</p>

18	6-Dec	Geoff Shaw	self	<p>[SEE PDF of COMMENT for CHARTS] Response to USAG-Pohakuloa ICRMP & EA This document raises more questions than it answers and I can't assume to include all but I will attempt to raise the most egregious concerns. I will start with the chart in section 1.3, which I assume is an overview of USAG-Pohakuloa properties. I wonder why the catonment area is listed as being 124 acres instead of the 758 acres granted in the gubernatorial EO of 1956. It is also curious that the state lease is not mentioned here. I have never done a count myself of all the buildings in the catonment area but I have seen a reference to more than 120.I have no comment about the section detailing all the regulations USAG-Pohakuloa is supposed</p> <p>to comply with other than to note that these regulations aren't even being met with the benefit of your circular reasoning. If there was any respect for these regulations you would cease using this sacred land for training purposes and clean it up.</p> <p>In the section about the geographic context nothing is said about the unique geography underlying PTA, other than the fact that there are 3 distinct volcanoes overlapping each other. While the formation of the Hawaiian Islands is mostly theory the prevailing conclusion is that there are two paths the hot spot is on, with Hualalai and Mauna Loa on one path and Mauna Kea on another that it shares with Kilauea. The volcanoes are at different stages of development which could create unstable conditions that seemingly can be compromised by the constant bombardment implicit with the ongoing training exercises at PTA. I have asked the commander if any study has been done on the effect of explosive munitions at PTA on the geology and hydrology of Hawaii Island and he replied that he isn't aware of any. Why is this unique geology not more of a concern. At a recent community meeting in Waimea the residents complained that their houses were shaking more than in the past and wondered if stronger munitions were being used, but the commander said they weren't. There is nothing detailed here on the hydrology of Hawaii Island, in past documents the Army said little is known but since then a test well was dug but nothing has been said about the results. Considering that they have a future superfund site developing over the island's aquifer the citizens of Hawaii Island have a right to know what the Army knows about this test well. The section about cultural context should come from a Kanaka Maoli perspective as much as possible when it relates to the pre-contact era. A distinct people should be able to tell it's own story and any effort to write that story for them should be considered ethnocide. Once western contact commences there are two sides of the story but it would behoove us westerners to own our part in suppressing the Hawaiian culture, starting with the missionaries, which get no mention in this section. I feel no need to go over this supposed history in detail, it is basically a rewriting of the story to support PTA's mission, which is seemingly genocide. I will point out there is no mention of Umi's Hei'au, which is only a few miles from PTA's western border or the fact that Umi himself may have resided in the area. There are still many questions that need to be answered about the early development of a training area in the Saddle Ridge. How did the</p>	<p>The analyses in the EA (Chapter 4: Affected Environment and Environmental Consequences) indicate that implementation of the ICRMPs would not have a significant effect on the natural or human environment, therefore an EIS is not warranted. The ICRMP includes only a brief summary of the geographic context; and the soils description was created from information provided in the USAG-Paōhakuloa Integrated Natural Resources Management Plan, soil surveys conducted by the U.S. Department of Agriculture, and findings from decades of land management on the installation. For a more detailed analysis of Pahokaloa's geography and soils, please see https://www.ctahr.hawaii.edu/oc/freepubs/pdf/SCM-20.pdf. Please also note that the listed acreage applies to the cantonment, while the 1956 gubernatorial EO included not only the cantonment, but also Bradshaw Army Airfield and a tract adjacent to Old Saddle Road.</p> <p>USAG-HI and USAG-Pohakaloa conducted an oral history study of Pahakaloa Training Center in 2002 and an Ethnographic Study in 2012 to identify Traditional Cultural Properties (TCPs) and properties of religious and cultural significance to Native Hawaiians, the results of which are incorporated in the ICRMP, and the Army continues to work with the community to identify the sacred sites and sacred landscapes at Pohakuloa Training Center. The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.</p>
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				<p>fact that Umi himself may have resided in the area. There are still many questions that need to be answered about the early development of a training area in the Saddle Region. How did the US military feel entitled to use this area for training exercises previous to 1956, was it just a general sense that they could do whatever they want. The only thing that was clarified in 1956 was the location of the catonment, it seems that the rule that the rest of the saddle region could be used for live-fire training with no boundaries was still applied. Did that training stay within the boundaries of what is now PTA or should people be aware of unexploded ordnance throughout this area. In 1964 the military finally designated boundaries for their activity, is there any explanation why most was seized with an EO but a large piece was also leased from the DLNR. This is the history I would like to see made clear in this document. These decisions seem to show a contempt for the Hawaiian people and their love of the land.The cultural resources overview does not go into detail of all the instances that the poor planning of the past make it impossible to comply with these regulations. It is my understanding that the military considers most of the impact area to be too dangerous to do the required surveys. They site national security as the reason they shouldn't have to follow regulations in this area. I would like an explanation as to what the specific threat is to national security. The Army needs to establish training areas that comply to regulations rather than overlookregulations to keep using training areas that are in non-compliance unless they can prove an actual threat to national security. They are used to the convenience of using non-compliant training areas but convenience is not a justifiable excuse. Of course if you aren't part of the consultation process you would never hear that the military is non-compliant, they don't own up to that in this document but they did behind closed doors. Since I pressed them on this and other issues I am now shut out of their consultation process but that is to be expected. They have no intention of consulting in good faith, they only want to continue their mission of genocide disguised as training. In the part of this document where they explain the Section 106 process they mention identifying the historic properties and I can honestly say do as little as humanly possible to make public what these historic properties are which would seem to beunderstanding of what these historic properties are then it becomes fairly easy to declare there are no sacred sites. They claim to have located over a 1000 possible sites but provide very little detail about any of them. They utilize their narrow definitions to eliminate many locations and then ignore others, such as a kipuka that I was told is considered specifically sacred but probably does not match their definition of something that could be considered sacred or even a historic site. I would not be surprised if their compliance with NAGPRA conditions is shoddy outside the impact area since there seems to be little oversite to the goings on inside PTA but inside of the impact area it is a virtual impossibility to meet these conditions. The saddle region</p>	
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				<p>environmental factors were analyzed or not analyzed in the EA. I can think of many reasons to include most of the categories not analyzed in the EA.</p> <p>An example of a conclusion that is flat out wrong is the statement that “Soils are poorly developed and soil erosion is less of an issue on the Island of Hawaii as compared to Oahu due to the limited amount of soil present.” This statement totally disregards the ecosystems dependant on that minimal soil and how much even minimal disturbance affects it. This would be the same as saying thievery is not an issue in neighborhoods inhabited by poor people because they didn’t have much money to begin with. How this passed the smell test is beyond my comprehension, that statement should have stunk up the room. A full EIS should be done, the effect of PTA and other military installations in Hawaii on a living culture should be examined also. In the era of “Me Too” the largest perpetrator of Hewa on the planet, the US military, needs to stand up, show some courage, and become accountable for itself. That would be a great step forward towards World Peace.</p> <p>Mahalo for your consideration,</p> <p>Geoff Shaw</p>	
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19	6-Dec	Ruth Callahan	self	<p>Everyone is having trouble viewing the provided EA site, just submit a comment on why you feel it's important via email, or simply ask for a full EA to protect the cultural resources. Only a fraction of the sites at Pohakuloa have had full archaeological survey. Despite adverse impacts to archaeological resources and sacred sites, the Environmental Assessment concluded a Finding Of No Significant Impact. Send your comments to: usaghi.pao.comrel@us.army.mil < Caution-mailto:usaghi.pao.comrel@us.army.mil ></p> <p>Here's some info: via Jim Albertini</p> <p>Please send in testimony calling for a Full Environmental Impact Statement on military impacts to Hawaiian Cultural resources at Pohakuloa ~ BY Dec. 7th, 2017 (visitors comments welcomed, too!)</p> <p>Send To:</p> <p>usaghi.pao.comrel@us.army.mil < Caution-mailto:usaghi.pao.comrel@us.army.mil > (see bottom for mailing address & Link to Environmental Assessment)</p> <p>*Military Pohakuloa Training Area Fact Sheet The Military Pohakuloa Training Area (PTA), located in the center of Hawaii Island is the largest military training area outside the continental United States. PTA encompasses 133,000-acres, and is nearly 5 times the size of Kaho'olawe Island, or larger than the islands of Kaho'olawe and Lanai combined.</p> <p>The land at PTA is Hawaiian Kingdom government and crown lands. It's been used as a military training area since WWII. Over 84,000-acres were simply seized through presidential executive order #11167 at no cost. Nearly 23,000 acres are leased by the Army from the State of Hawaii for 65 years at a total cost of \$1.00.</p> <p>Po-haku-loa is translated to mean: The Land of the Night of Long Prayer. Pohakuloa is known as the sacred heavenly realm of unity between the three great mountains – Mauna Kea, Mauna Loa, and Hualalai. To bomb Pohakuloa is considered desecration and sacrilegious to Hawaii's native people –the Kanaka Maoli.</p> <p>Military documents claim that up to 14.8 million live-rounds are fired annually at Pohakuloa by all branches of the U.S. military and other countries. Weapon systems of all sorts are used at PTA, including small arms, artillery, helicopter gun ships, bombing by fighter jets, B-52, B-1 and B-2 bombers, etc. In 2007, the Army confirmed that it has used Depleted Uranium (DU) radiation weapons at PTA dating back to the 1960s. The number of DU rounds fired is not known but the Army has said it is prohibited from firing DU weapons in training at PTA since 1996. Comprehensive, independent, testing and monitoring to determine the full extent of radiation contamination at PTA is being opposed by the military.</p> <p>Unmanned Aerial Vehicles (UAV) drone aircraft are used in training at PTA. A drone airfield has been constructed less than 1 mile on the Hilo side of Mauna Kea Park between the old and new Saddle Rd.</p> <p>PTA contains many important cultural and historic sites and has the highest concentration of endangered species of any U.S. Army installation in the world, native and endangered birds such as, Nene, Palila, Amakihi and many others.</p> <p>PTA has known health hazards – lead, radiation, and other military toxins, and is located in a dry environment adjacent to a Girl Scout Camp where continued bombing and military maneuvers, together with frequent high winds, risk spreading the contamination in small dust particles.</p>	<p>The analyses in the final EA (Chapter 4: Affected Environment and Environmental Consequences) indicate that implementation of the ICRMPs would not have a significant effect on the natural or human environment, therefore an EIS is not warranted.</p> <p>The Army and other military services have an ongoing need to conduct live-fire training at Pohakaloa Training Center. The Army remains committed to continuing to protect the health and safety of people in surrounding communities, Soldiers and their Families, and the civilian work force who live near and work at PTA. To that end, the Army is continuing to work with the State of Hawaii and other federal agencies to monitor the land for potential transport of pollutants caused by military actions.</p> <p>The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.</p>
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20	6-Dec	Josephine Keliipio	self	<p>PLEASE INITITATE A FULL ENVIRONMENTAL IMPACT STATEMENT on Military Impacts to Hawaiian Cultural Resources Pohakuloa.</p> <p>Mahalo and Thank you,</p> <p>Josephine Keliipio</p> <p>Kailua Kona, Hawaii</p>	<p>The analyses in the final EA (Chapter 4: Affected Environment and Environmental Consequences) indicate that implementation of the ICRMPs would not have a significant effect on the natural or human environment, therefore an EIS is not warranted.</p> <p>The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process..</p>

21	6-Dec	Ruth Aloua	self	<p>Aloha,</p> <p>I am a Kanaka Maoli (Native Hawaiian) who has genealogical ties to the islands of Hawai'i. I have reviewed the ICRMP and have several issues with plan that deal with:</p> <p>*</p> <p>Military priorities being placed before consideration/protection to cultural resources. The plan states that the Cultural Resource Management plan is to "develop and implement procedures to protect against encumbrances to mission by ensuring that Army installations effectively manage cultural resources." This is problematic because cultural resources are being treated second to the military mission when in fact, this plan should seek to achieve the opposite. Cultural Resources are not "encumbrances." The military should be seeking to avoid any impact to cultural resources, including, the area itself. Many Native Hawaiians actively oppose the use of this area for live-fire trainings. There is no discussion or mention of these perspectives in this plan. There is a growing movement of individuals who actively and openly oppose militarization of Hawai'i and call for peace and non-violence.</p> <p>* Lack of understanding, inventory, description of the cultural resources at PTA. According to the ICRMP only 20% of the Impact Area has been surveyed leaving 80% that remains to have an Archaeological Inventory Survey (AIS) conducted. The archaeological resources in this area are those which have the greatest chance of being destroyed. Being that this is the case, it seems appropriate that the plan be revised to include a full AIS of the Impact Area as a minimal requirement for approval. How can any type of consideration/ protection be given to these cultural resources when the managers themselves have no clue about what cultural resources are located at in the Impact Area? Furthermore, the plan states that only 50% of the area outside of the Impact Area has been surveyed leaving 50% unsurveyed. Again, how can the cultural resource mangers expect to protect resources they do not know exists?Are they not asking these questions? Who are the archaeologists on staff that will be conducting surveys and what are their feelings about the ICRMP? Live-fire trainings involve earth shaking actions that have the potential to damage sites due to repeated, intense, shaking (to resources in Impact Area and outside of this area). In construction the use of heavy equipment is given mitigation and yet the use of live-fire trainings are not when they create vibrations of a much greater intensity. Because of these irreversible damages to these archaeological resources (that are non-renewable resources) it seems more than appropriate that the plan call for an AIS for this unsurveyed area and resurveying of those previously surveyed.</p> <p>* No description, discussion or mention of intangible values associated with the area. Many Kanaka Maoli (including myself) have cultural and spiritual connections to Pōhakuloa. No where in this plan is there any discussion of any intangible values and how they will be impacted by training activities, why not? No plan, whether for Pōhakuloa or another area, can efficiently do its due diligence to address cultural resources without acknowledging the intangible values associated with the area and sites. This area lies along the slopes of Mauna Kea and Mauna Loa. Considerations of the effect of training on the broader area and areas of significance should be included Pōhakuloa is a cultural resource why is this not discussed? Again who is the archaeologist(s) that will stand by this plan? They should know that this plan is inadequate and their efforts must be greater and far more expansive and inclusive. The Section 106 process should be initiated and reopened to include myself and others who were missed during initial discussions.</p>	<p>USAG-HI and USAG-Pohakuloa shall continue to comply with federal and Army regulatory requirements, including Army Regulation 200-1, in which it states that the major goal of Army cultural resources management programs is to protect against encumbrances to the mission and effectively manage cultural resources.</p> <p>The Army is dedicated to fulfilling its responsibilities under the National Historic Preservation Act, the American Indian Religious Freedom Act, the Archaeological Resources Protection Act, and the Native American Graves Protection and Repatriation Act. Likewise, the Army has, and will continue, to conduct archaeological surveys to identify cultural resources present on Army-controlled lands wherever health and safety requirements can be met.</p> <p>USAG-HI and USAG-Pohakaloa conducted an oral history study of Pohakaloa Training Center in 2002 and an Ethnographic Study in 2012 to identify Traditional Cultural Properties (TCPs) and properties of religious and cultural significance to Native Hawaiians, the results of which are incorporated in the ICRMP, and the Army continues to work with the community to identify the sacred sites and sacred landscapes at Pohakuloa Training Center. The analyses in the final EA (Chapter 4: Affected Environment and Environmental Consequences) indicate that implementation of the ICRMPs would not have a significant effect on the natural or human environment, therefore an EIS is not warranted. The EA concludes that there will be no impact or a beneficial impact to a range of environmental factors from implementation of the ICRMP. Any future projects that may impact resources will undergo their own level of analysis as required by NEPA.</p> <p>The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.</p>
				<p>* Despite Potential Adverse Effects to Archaeological Resources there will be a potential for Findings of No Significant Impact . The ICRMP assumes that there will be a Finding of No Significant Impact despite potential adverse effects to archaeological resources and without fully discussing what type of training activities will be conducted, how training activities will impact the cultural resources, types of chemicals/disturbance that will be created through live-fire trainings. Given the ICRMP finding of Potential Adverse Effects to Archaeological Resources the ICRMP should be revised to a have a finding of Adverse Impacts.</p> <p>Lack of information in this plan. There are numerous questionable conclusions that the ICRMP will have either "No Impact" or "Beneficial Impact" to the Air Quality, Soils, Water, Native Ecosystems and Biological Diversity, Threatened and Endangered Species, Invasive Species, Aesthetic and Visual Resources, Socioeconomics, Protection of Children and Private Property, and Environmental Justice. All of these are cultural resources - why aren't they included in the cultural resource discussion? Furthermore, to make these statements there must be evidence of some sort (e.g., scientific, cultural, etc.) that can support these claims. These claims do not exist in a vacuum separate from other plans that exist and the actual training that occurs in the area. The U.S. Army Garrison-Pohakuloa should initiate a Full Environmental Impact Statement.</p> <p>Given the issues noted I find that this plan has Adverse Impacts and thus the U.S. Army Garrison-Pohakuloa should initiate a Full Environmental Impact Statement and reopen the Section 106 consultation. I and other Kanaka Maoli would like to be consulted regarding this plan and others for the area.</p> <p>Comments made by:</p> <p>Ruth Aloua Kanaka Maoli District: Kona</p>	

22	6-Dec	Geoff Shaw	self	Emailled to PAO Box - [SEE PDF of COMMENT for CHARTS] Please consider using this fine tuned version of my earlier response, the content is mainly the same, just corrected some wording. If you have any questions email me at	The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.
23	6-Dec	Pua'ena Ahn	self	Emailled to PAO Box - The following comments in response the 2017 USAG-Pohakuloa ICRMP were collected and video recorded in a public meeting on November 30, 2017. Full video is available publicly for viewing at the following link: Caution-http://www.bigislandvideonews.com/2017/12/02/video-peoples-hearing-on-pohakuloa-in-hilo/ <Caution-http://www.bigislandvideonews.com/2017/12/02/video-peoples-hearing-on-pohakuloa-in-hilo/> Thank you	12/07 - Aloha Pua'ena Ahn, This email confirms receipt of your comments on the proposed implementation of the Integrated Cultural Resources Management Plans. We greatly appreciate you taking time to review the documents and provide your feedback. We value the community's input and will not make a final decision on the implementation of the plans until after reviewing public comments. As a reminder, we are accepting written comments via email or mail during this public comment period. If you need additional time to transcribe the content of your video so that it may be submitted as written comment, please email it by close of business Monday, December 11, 2017 to: usarmy.wheeler.id-pacific.list.community-relations@mail.mil. Mahalo, Lisa Graham NEPA Program Manager U.S. Army Garrison Hawaii The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.
24	6-Dec	Robert and Marion McHenry	self	Emailled to PAO Box - Aloha! RE: U.S. Army Garrison-Pohakuloa 2017 Draft Integrated Cultural Resource Management Plan /Comment. Please initiate a Full Environmental Impact Statement on military impacts to Hawaiian Cultural resources at Pohakuloa. These are public treasures. Mahalo/Thank you, Robert and Marion McHenry Princeville, HI	The analyses in the final EA (Chapter 4: Affected Environment and Environmental Consequences) indicate that implementation of the ICRMPs would not have a significant effect on the natural or human environment, therefore an EIS is not warranted. The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.
25	6-Dec	Loa Patao	self	Please initiate a full Environment Impact Statement on military impacts to Hawaiian Cultural resources at Pohakuloa. Mahalo, Aoloa Patao -- Loa Patao	The analyses in the final EA (Chapter 4: Affected Environment and Environmental Consequences) indicate that implementation of the ICRMPs would not have a significant effect on the natural or human environment, therefore an EIS is not warranted. The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.
26	6-Dec	Pi'ikea Keawekane-Stafford	self	Aloha! Please initiate a Full Environmental Impact Statement on military impacts to Hawaiian Cultural resources at Pohakuloa. Mahalo/Thank you, Pi'ikea Keawekane-Stafford	The analyses in the final EA (Chapter 4: Affected Environment and Environmental Consequences) indicate that implementation of the ICRMPs would not have a significant effect on the natural or human environment, therefore an EIS is not warranted. The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.
27	6-Dec	Natalie Santiago	self	Aloha! RE: U.S. Army Garrison-Pohakuloa 2017 Draft Integrated Cultural Resource Management Plan /Comment. Please initiate a Full Environmental Impact Statement on military impacts to Hawaiian Cultural resources at Pohakuloa. Mahalo/Thank you,	The analyses in the final EA (Chapter 4: Affected Environment and Environmental Consequences) indicate that implementation of the ICRMPs would not have a significant effect on the natural or human environment, therefore an EIS is not warranted. The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.

28	6-Dec	Shay	self	<p>To whom this concerns,</p> <p>My name is Shay and I have come forward to request, or as a native Hawaiian, humbly demand a full environmental impact report, regarding the Pohakuloa Training Area. I have spoken to Army Garrison Eric Hamilton and have read the reports, studies and claims on the training area website. Eric is in a pivotal position. On one side, he has a job to do and orders to carry out, on the other, he has a nation of hurt people, who are voicing concerns that NEED to be heard. He is not in an authoritative position to hold discussion boards which include the public, but You who received this email most certainly are.</p> <p>I expressed my concerns of present day use of DU on our land. Eric explained there is no present day use and it's illegal. This doesn't discount the past. The sediment is there, so everytime they train and shoot into the mountain, the DU is unearthed and travels to water sources and farm lands. If this is untrue, then the solution is simple- follow through with a FULL ENVIRONMENTAL IMPACT report. Show us that what your website's say and the words you speak are true to the best of your ability.</p> <p>At some point, you must stop and ask yourself "when will the United States military be content with the power and progress they've obtained?" When the water is undrinkable? When the Earth has nothing left to give us? This affects ALL of us. You are no better than I am, as I am no better than you are. Please bring empathy and compromise to the forefront of your judgement and do the right thing. Not what you're told, or ordered to do. When people are just " following orders" the nightmares don't care where the order came from. This island IS very much alive, and she feels the pain and hurt brought upon her AND her people. Please do what is right, not legal.</p> <p>I look forward to hearing from you.</p> <p>Aloha, Shay</p>	<p>The analyses in the final EA (Chapter 4: Affected+F28 Environment and Environmental Consequences) indicate that implementation of the ICRMPs would not have a significant effect on the natural or human environment, therefore an EIS is not warranted.</p> <p>The Army and other military services have an ongoing need to conduct live-fire training at Pohakaloa Training Center. The Army remains committed to continuing to protect the health and safety of people in surrounding communities, Soldiers and their Families, and the civilian work force who live near and work at PTA. To that end, the Army is continuing to work with the State of Hawaii and other federal agencies to monitor the land for potential transport of pollutants caused by military actions.</p> <p>The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.</p>
29	6-Dec	Keala Kahuanui	self	<p>Aloha!</p> <p>RE: U.S. Army Garrison-Pohakuloa 2017 Draft Integrated Cultural Resource Management Plan /Comment.</p> <p>Please initiate a Full Environmental Impact Statement on military impacts to Hawaiian Cultural resources at Pohakuloa.</p> <p>Mahalo, Keala Kahuanui</p>	<p>The analyses in the final EA (Chapter 4: Affected Environment and Environmental Consequences) indicate that implementation of the ICRMPs would not have a significant effect on the natural or human environment, therefore an EIS is not warranted.</p> <p>The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.</p>
30	6-Dec	Kau'i Trainer	self	<p>ERE: U.S. Army Garrison-Pohakuloa 2017 Draft Integrated Cultural Resource Management Plan /Comment.</p> <p>Dear sir or madam:</p> <p>Please initiate a Full Environmental Impact Statement on military impacts to Hawaiian Cultural resources at Pohakuloa. I am certain that the findings of “no significant impact” are a fabrication. Please clean up Pohakuloa, Makua Valley and Kahoolawe.</p> <p>Mahalo, Kau'i Trainer</p>	<p>The analyses in the final EA (Chapter 4: Affected Environment and Environmental Consequences) indicate that implementation of the ICRMPs would not have a significant effect on the natural or human environment, therefore an EIS is not warranted.</p> <p>The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.</p>
31	7-Dec	Barbara Barry	self	<p>Aloha</p> <p>I want to voice my deep opposition to the US military using the sacred lands of Pohakuloa as a military training facility. These lands do not belong to you and the use of depleted uranium in a geographical important place where the watershed for many people is can only be described as deplorable. Find somewhere else like the Mohave desert to play your war games. Not Hawaii, not Pohakuloa.</p> <p>The US military is putting a bullseye on these sacred islands.</p> <p>Its time for the military to go.</p> <p>Aloha, Barbara Barry Maui, Hawaii</p>	<p>The Army and other military services have an ongoing need to conduct live-fir+F32e training at Pohakaloa Training Center. The Army remains committed to continuing to protect the health and safety of people in surrounding communities, Soldiers and their Families, and the civilian work force who live near and work at PTA. To that end, the Army is continuing to work with the State of Hawaii and other federal agencies to monitor the land for potential transport of pollutants caused by military actions.</p> <p>The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.</p>


32	7-Dec	Claud Sutcliffe	self	<p>Aloha!</p> <p>I wish to register my strong opposition to the Army's continued conduct of any activities at Pohakuloa other than shutting all operations down and beginning the process of restoring our 'Aina (sacred land) to its former condition.</p> <p>I find it very sad that you minimize the damage that has been done to Mauna a Wakea and its cultural resources... Perhaps you don't understand that many of us -newcomers as well as Kanaka Ma'oli- literally cry when we feel the bombs and artillery shells...</p> <p>Mahalo</p> <p>Claud Sutcliffe, Ph.D.</p>	<p>The Army and other military services have an ongoing need to conduct live-fire training at Pohakaloa Training Center. The Army remains committed to continuing to protect the health and safety of people in surrounding communities, Soldiers and their Families, and the civilian work force who live near and work at PTA. To that end, the Army is continuing to work with the State of Hawaii and other federal agencies to monitor the land for potential transport of pollutants caused by military actions.</p> <p>The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.</p>
33	7-Dec	Claud Sutcliffe	self	<p>Aloha!</p> <p>Please register my comment as strong opposition to any U.S. army activities at Pohakuloa other than leaving the area and restoring the 'Aina.</p> <p>Mahalo!</p> <p>Claud Sutcliffe, Ph.D.</p>	<p>The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.</p>
34	7-Dec	Alison Yahna	self	<p>Aloha!</p> <p>RE: U.S. Army Garrison-Pohakuloa 2017 Draft Integrated Cultural Resource Management Plan /Comment.</p> <p>Please initiate a Full Environmental Impact Statement on military impacts to Hawaiian Cultural resources at Pohakuloa.</p> <p>The essence of Hawaiian Culture is ALOHA 'AINA ... to love and care for the land. The continued bombing of our Mother Earth, our papahanaumoku, has an extremely detrimental impact on our mental health as well as negative environmental impacts such as the release of depleted uranium dust into the atmosphere and water table.</p> <p>Mahalo/Thank you,</p> <p>Alison Yahna</p>	<p>The analyses in the final EA (Chapter 4: Affected Environment and Environmental Consequences) indicate that implementation of the ICRMPs would not have a significant effect on the natural or human environment, therefore an EIS is not warranted.</p> <p>The Army and other military services have an ongoing need to conduct live-fire training at Pohakaloa Training Center. The Army remains committed to continuing to protect the health and safety of people in surroundi+F34ng communities, Soldiers and their Families, and the civilian work force who live near and work at PTA. To that end, the Army is continuing to work with the State of Hawaii and other federal agencies to monitor the land for potential transport of pollutants caused by military actions.</p> <p>The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.</p>
35	5-Dec (Postmarked)	Shelly S. Mahi-hanai	self	<p>see digital copy titled 35.Mailed_Shelley Mahi-hanai</p>	<p>The analyses in the final EA (Chapter 4: Affected Environment and Environmental Consequences) indicate that implementation of the ICRMPs would not have a significant effect on the natural or human environment, therefore an EIS is not warranted.</p> <p>The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.</p>
36	12/8/2017 (Postmarked)	Hawaii Academy of Arts and Science/ Jim Albertini	Hawaii Academy of Arts and Science	<p>see digital copy titled 36.Mailed_Jim Albertini_HI Academy of Arts Science. Note issue with PPI.</p>	<p>The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.</p>

37	14-Dec	Alan Downer	State Historic Preservation Division	<p>On November 7, 2017, the State Historic Preservation Division (SHPD) received a notification letter from the Department of the Army, Office of the Garrison Commander attached with two draft Integrated Cultural Resources Management Plans (ICRMPs) for review. One draft ICRMP has been prepared for the U.S. Army Garrison, Hawaii (USAG-HI) on Oahu Island and the other has been prepared for the U.S. Army Garrison, Pohakuloa (USAG-Pohakuloa) on Hawai'i Island. Thank you for the opportunity to comment on the ICRMPs prepared for Oahu Island and Hawai'i Island. The SHPD has reviewed the documents and offers the following comments for your consideration:</p> <p>1) The ICRMPs are lacking essential information such as standard operating procedures (SOPs) and best management practices to avoid, minimize or mitigate any adverse effects on historic properties during the process of the undertaking. The subject ICRMPs need clear and concise processes recorded for how installation personnel, and project proponents and planners will receive information and carry out proposed undertakings.</p> <p>2) The ICRMP requires maps, guidelines and timelines for updating GIS information and surveys, SOPs for data collection including GIS standards and the types of GPS equipment for use including the methods in which GIS data will be collected and formatted for the purpose of data sharing.</p> <p>3) Important information and data should be provided so that installation personnel, and project proponents and planners are aware of the locations of historic properties, historic districts, and culturally sensitive areas during the planning and implantation phases of projects. This includes a synthesis of previous surveys and studies as well as maps illustrating the following: installation boundaries, historic districts, land jurisdiction, the boundaries in which agreement documents are applicable, cultural sensitivity areas with defined low, medium, and high sensitivity areas, the locations of previous survey areas with indication to the type of survey conducted, and the locational boundaries of historic properties, as well as a color coded map of buildings that are on the register, have been determined eligible or ineligible, and those which need to be evaluated or re-evaluated.</p> <p>4) The document is in need of clear and concise consultation processes. This includes commitments such as recording and sharing public meeting minutes with consuting parties for their review, a standard timeline for consulting parties to review and comment on meeting mintues and proposed undertakings, and standard methods for correspondence transmittal.</p> <p>5) The ICRMPs indicate deficiencies in the Army's cultural resource managment program. For example, the level of surveys, GIS data and updates, and updates to inventory information; the ICRMPs should outline procedures and timelines for addressing these deficiencies.</p>	<p>The Army thanks you for your comment and greatly appreciates SHPD's review and input on the ICRMPs. In response to your comments, the ICRMPs will be updated to include sub-installation location maps and corrected information regarding the Hawaii Register of Historic Places. The Army anticipates future updates to the ICRMPs, which may include procedures for updating inventory information, best management practices, and an expanded bibliography of prior surveys. The Army likewise appreciates any input SHPD can offer regarding errors within the Cultural Context and a list of studies in SHPD's library pertaining to surveys and documentation of historic properties on Army lands. Please see below for specific responses to particular items in your comment.</p> <p>1) ICRMP Section 5.0 contains a set of nine (9) Standard Operating Procedures, the first of which generally describes USAG-HI's and USAG-Pohakuloa's process for review of undertakings in accordance with Section 106 of NHPA. Efforts to avoid or minimize adverse effects to historic properties are acknowledged (p. __) and shall be determined through individual consultations. The Section 106 process, as outlined in the ICRMPs, favors flexibility over restriction to allow for unique circumstances that may arise in the future.</p> <p>2) In response to your comments, locational maps of the Army sub-installations on each island shall be added to each ICRMP.</p> <p>3) The ICRMPs are a public document that serve as a planning tool to establish procedures for coordination between Cultural Resources staff and other personnel at the installation. Some of this information is sensitive and therefore restrictions regarding public dissemination apply. The information you have listed is generally available for internal use only through a GIS system maintained by the Directorate of Public Works (DPW), compatible with spatial data standards imposed by the Department of Defense.</p> <p>4)ICRMP Standard Operating Procedure (SOP) 1 establishes consultation processes for Section 106 consultations, SOP 5 describes consultation under NAGPRA, and SOP 7 addresses Native Hawaiian consultation in general. Specifics of how consultations will be conducted are unique to each consultation, therefore the SOPs are general to allow for situation dependent flexibility. DoDI 4715.16 and AR 200-1 do not require a certain level of specificity in articulating the consultation processes in an ICRMP.</p> <p>5) Resolving inconsistencies in the inventory data has been identified as a major goal for the Cultural Resources Program, but the ability to do so is dependent upon funding and staff availability, which are influenced by factors beyond the control of the installations. A firm timeline for completing this goal is premature, but future updates to the ICRMPs may include a more detailed procedure for updating inventory data.</p>
38	14-Dec	Alan Downer	State Historic Preservation Division	<p>6) The ICRMPs should acknowledge that eligibility can change over time and include procedures for updating determinations of eligibility. More over the ICRMPs should include the dates of when determinations of eligibility were made.</p> <p>7) The ICRMPs need to correctly differentiate between the State Inventory of Historic Places (SIHP) and the Hawaii Register of Historic Places. The inventory is a list of properties that have been surveyed; the Hawaii Register is a list of properties that meet eligibility requirements and have been nominated for or listed in the Hawaii Register. Please note, the Richardson Theater and Palm Circle are listed in the Hawaii Register of Historic Places (page 54).</p> <p>8) Will the ICRMP be used to implement the Army Alternate Procedures (AAP)?</p> <p>9) These documents should interface with previous studies including environmental assessments, environmental impact statements, biological impact statements as well as contemporary and future agreement documents. Furthermore, this document needs to define how these studies will be shared with cultural resources managers and project personnel as they conduct their responsibilities.</p> <p>10) Each command has responsibilities with respect to licensing and permits. For example, a license for the possession of depleted uranium was issued to the U.S. Army Installation Management Command at Schofield Barracks and Pohakuloa Training Area; the ICRMPs should include commitments to ensure licenses and permits are up to date and providing availability of verification.</p> <p>11) As indicated by the Advisory Council on Historic Preservation (ACHP), the Army's has emphasized the need for integrated cultural resources management; this is a "cultural landscape approach" to planning and management, whereby the military installation is viewed as an integrated landscape of natural and cultural resources and processes including militaty operations. Rather than a compliance driven approach to cultural resource management, the Army is moving towards a comprehensive integrated planning concept.</p> <p>12) The ICRMP is in need of a complete bibliography referencing all previous studies and surveys relating to archeological, architectural, and cultural resources for the islands of O'ahu and Hawaii.</p> <p>13) The ICRMPs should address whether, if at all, the Army will provide updates on work progress such as annual reports to consulting agencies such as the SHPD and ACHP.</p> <p>14) Lastly, the SHPD's review is focused on broad, general concerns rather than specific details. However, it is noted that information in portions of Section 2.2 Cultural Context contain errors to be addressed.</p>	<p>6) The DoD requires auditable tracking of documentation supporting the Historic Status Code determination, as applied to buildings and structures. This requirement is likely to be expanded to cover all other historic properties (for example, archaeological sites) in coming years. The ICRMP may be improved by adding the effective date for current status with respect to the National Register and the means by which that status is documented for each historic property. At present, Army is more concerned with focusing limited resources on evaluating the unevaluated cultural resources, rather than systematically revisiting past determinations. If new information becomes available it will be taken into consideration.</p> <p>7) Future versions of the ICRMP will address the State of Hawaii's use of State Inventory of Historic Property (SIHP) numbers, and the interaction/overlap with National Register status and other cultural resources inventory tracking numbers/labels.</p> <p>8) USAG-HI and USAG-Pohakuloa have no plans to implement the Army Alternative Procedures at this time.</p> <p>9) In accordance with DoDI 4715.16 and AR 200-1, ICRMPs are to be integrated with the installation Master Plan and other planning documents.</p> <p>10) The ICRMP addresses the cultural resources responsibilities of the installation. While some licenses and permits require evaluation under Section 106, ARPA, and/or NAGPRA, an ICRMP does not establish the validity or applicability of licenses and permits for other purposes beyond the purview of Cultural Resources.</p> <p>11) An ICRMP is a plan that defines the process for the management of cultural resources on Department of Defense installations (DoDI 4715.16: 27) specifically for the purpose of compliance with statutory management requirements (DoDI 4715.16: 5). "Integrated" refers to integration of Cultural Resources processes and requirements with other directorates and divisions on the installation.</p> <p>12) The Army anticipates future updates to the ICRMP, which may include an expanded bibliography of previous studies and surveys.</p> <p>13) The Army provides annual reports and other updates in compliance with those agreement documents stipulating them.</p> <p>14) A list of such commitments will be considered for inclusion in future updates of the ICRMPs.</p> <p>These documents have been reviewed numerous times by the historic preservation professionals at the Garrisons and are accurate to our understanding of the history.</p>

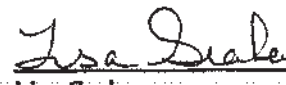
ENVIRONMENTAL ASSESSMENT
for
Implementation of the
U.S. Army Garrison, Hawai'i
and
U.S. Army Garrison, Pōhakuloa
Integrated Cultural Resources Management Plans

September 2017


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LIST OF ACRONYMS

AMR	Āliamanu Military Reservation
AR	Army Regulation
ARPA	Archaeological Resources Protection Act
CA	Comprehensive Agreement
CEQ	Council on Environmental Quality
CRM	Cultural Resource Manager
DoD	Department of Defense
DoDI	Department of Defense Instruction
DMR	Dillingham Military Reservation
DPW	Directorate of Public Works
DRD	Drum Road (Pūpūkea-Pa‘ala‘a-Uka Military Road)
EA	Environmental Assessment
EO	Executive Order
EPA	Environmental Protection Agency
FDR	Fort DeRussy Military Reservation
FNSI	Finding of No Significant Impact
FSK	Field Station Kunia
FSMR	Fort Shafter Military Reservation
FY	Fiscal Year
GIS	Geographic Information System
HAW	Hawai‘i Army Weekly
HBMP	Hawai‘i Biodiversity and Mapping Program
HPC	Historic Property Component Plans
HMR	Helemano Military Reservation
ICRMP	Integrated Cultural Resource Management Plan
IMCOM-PAC	Installation Management Command-Pacific
KAS	Kīpapa Ammunition Storage Site
KLOA	Kawailoa Training Area
KMC	Kīlauea Military Camp
KTA	Kahuku Training Area
MAB	Mokulē‘ia Army Beach
MKS	Mauna Kapu Communication Station Site
MOU	Memoranda of Understanding
MMR	Mākua Military Reservation
NAGPRA	Native American Grave Protection and Repatriation Act
NEPA	National Environmental Policy Act of 1969
NEV	Not Yet Evaluated
NHL	National Historic Landmark
NHO	Native Hawaiian Organization
NHPA	National Historic Preservation Act of 1966
NPS	National Park Service
NRHP	National Register of Historic Places
NRP	Natural Resources Program
PTA	Pōhakuloa Training Area
RPLANS	Real Property Planning and Analysis System
SBER	Schofield Barracks East Range
SBMR	Schofield Barracks Military Reservation

SBWR	Schofield Barracks West Range
SBSR	Schofield Barracks South Range
SHPD	State Historic Preservation Division
SHPO	State Historic Preservation Office
SOP	Standard Operating Procedure
TAMC	Tripler Army Medical Center
TNC	The Nature Conservancy
UPH	Unaccompanied Personal Housing
USACE	United States Army Corps of Engineers
USAEC	United States Army Environmental Command
USAG-HI	United States Army Garrison, Hawai'i
USAG-Pōhakuloa	United States Army Garrison, Pōhakuloa
USPACOM	United States Pacific Command
USARHAW	United States Army Hawai'i
USARHAW TSS	United States Army Hawai'i Training Support Systems
USARPAC	United States Army Pacific
WAAF	Wheeler Army Airfield
WAST	Waikakalaua Ammo Storage Tunnels Site
WMR	Waianae-Kai Military Reservation

CHAPTER 1 PURPOSE AND NEED FOR THE PROPOSED ACTION

1.1 How to Read this Environmental Assessment

Chapter 1: Purpose and Need for the Proposed Action describes the purpose and need for U.S. Army Garrison, Hawai'i (USAG-HI) and U.S. Army Garrison, Hawai'i Pōhakuloa (USAG-Pōhakuloa) to implement Integrated Cultural Resources Management Plans (ICRMPs) for sub-installations on the islands of O'ahu and Hawai'i. This chapter also describes the scope of this environmental assessment (EA); summarizes the agency and public participation process; and provides a brief overview of the Proposed Action and the alternatives considered.

Chapter 2: Description of Proposed Action provides an in-depth discussion of the Proposed Action, which is ICRMP implementation for both USAG-HI and USAG-Pōhakuloa sub-installations.

Chapter 3: Alternatives Considered examines alternatives to the Proposed Action.

Chapter 4: Affected Environment and Environmental Consequences presents the affected environment, resources with the potential to be impacted, and analyzes any plausible environmental, cultural, social, and economic consequences that are projected to occur from implementing the preferred alternative and the No Action Alternative.

Chapter 5: Conclusions summarizes potential effects associated with the alternatives and recommends which alternative should be implemented.

Chapter 6: Agencies and Persons Consulted lists the agencies and the persons/groups that were consulted during this process.

Chapter 7: List of Preparers lists the individuals who prepared this EA.

Chapter 8: References documents the sources referenced in this analysis.

1.2 Introduction

USAG-HI and USAG-Pōhakuloa propose to implement two separate ICRMPs to integrate the entirety of Garrison Cultural Resources Sections with ongoing mission activities and to consolidate legal responsibilities into an efficient and coherent cultural resources program. The ICRMPs include goals and objectives for addressing specific cultural resources management needs and prioritize education and coordination with the many other programs and activities that may interact with cultural resources on USAG-HI and USAG-Pōhakuloa managed lands.

The Department of Defense (DoD), the Department of the Army, USAG-HI, and USAG-Pōhakuloa are required by Department of Defense Instruction (DoDI) 4715.16, *Cultural Resources Management*, and Army Regulation (AR) 200-1, *Environmental Protection and Enhancement*, to implement and

maintain ICRMPs. An ICRMP is an instrument for compliance with the statutory management requirements of applicable statutes and regulations and provides specific compliance procedures to comprehensively manage cultural resources while sustaining the Army's capability to successfully achieve its mission. An ICRMP is an integral part of an installation's master plan.

This EA addresses the requirements of the National Environmental Policy Act (NEPA) of 1969 and adheres to the NEPA processes as outlined by the Council on Environmental Quality (CEQ) guidelines 40 CFR 1500-1508 *Protection of Environment*, and 32 CFR Part 651, *Environmental Analysis of Army Actions*. This EA informs decision-makers and the public of the possible environmental consequences of following the Proposed Action and the "no action" alternative of maintaining the status quo by evaluating the direct and indirect environmental and socioeconomic impacts of each alternative. This EA also addresses the potential for cumulative effects from the action when added to past and reasonably foreseeable future impacts.

1.3 Purpose and Need for Action

The purpose of the Proposed Action is to ensure that USAG-HI and USAG-Pōhakuloa make informed decisions regarding cultural resources, in compliance with rules and regulations, supportive of the military mission, and in accordance with established practices of cultural resources management. Adopting and implementing both USAG-HI and USAG-Pōhakuloa ICRMPs will provide comprehensive guidance for the identification, protection, preservation, restoration, and enhancement of cultural resources on Garrison-managed lands. ICRMPs are needed to ensure successful stewardship of cultural resources and to maintain compliance with DoDI 4715.16 and AR 200-1. ICRMPs ensure consistency in application by consolidating management principles included in over 40 separate statutes, regulations, and other binding guidance that dictate the responsibilities for managing cultural resources on military lands. Implementation of the Proposed Action would fulfill USAG-HI and USAG-Pōhakuloa requirements to maintain mission readiness and will improve coordination between management units at 19 sub-installations managed by USAG-HI on the island of O'ahu and three sub-installations managed by USAG-Pōhakuloa on the island of Hawai'i.

Cultural resources management on USAG-HI and USAG-Pōhakuloa sub-installations is currently guided by existing Army guidance documents and federal laws and regulations. Programmatic agreements and memorandums of agreement are enacted in accordance with regulations.

1.4 Scope of the Document

This EA analyzes the potential environmental and socioeconomic impacts associated with the No Action Alternative of continuing existing management direction and the potential impacts of the preferred alternative: implementation of both the USAG-HI and USAG-Pōhakuloa ICRMPs. The ICRMPs provide guidance for the following 22 sub-installations on the islands of O'ahu and Hawai'i:

O ‘ahu (USAG-HI)

Cantonments

Āliamanu Military Reservation (AMR)
Fort Shafter Military Reservation (FSMR)
Helemanu Military Reservation (HMR)
Tripler Army Medical Center (TAMC)
Wheeler Army Airfield (WAAF)

Training Areas

Dillingham Military Reservation (DMR)
Kahuku Training Area (KTA)
Kawailoa Training Area (KLOA)
Mākua Military Reservation (MMR)
Schofield Barracks Military Reservation (SBMR)

Recreational Areas

Fort DeRussy Military Reservation (FDR)
Mokulē‘ia Army Beach (MAB)
Pirilā‘au Army Recreation Center (PARC) located within Wai‘anae Kai Military Reservation (WMR)

Other Use Areas

Kīpapa Ammunition Storage Site (KAS)
Field Station Kunia (FSK)
Mauna Kapu Communication Station Site (MKS)
Pūpūkea-Pa‘ala‘a-Uka Military Road (Drum Road) (DRD)
Signal Cable Trunking System
Waikakalaua Ammo Storage (WAS)

Hawai‘i (USAG-Pōhakuloa)

Kawaihae Military Reservation
Kīlauea Military Camp (KMC)
Pōhakuloa Training Area (PTA)

This EA does not attempt to provide a quantitative analysis of site-specific impacts from individual projects that will be implemented during the next five-year funding period (FY2017-FY2021). Consistent with NEPA and other applicable statutes and regulations, additional analysis will be considered to analyze any impacts, prior to proceeding with specific projects or installation training activities that may affect cultural resources.

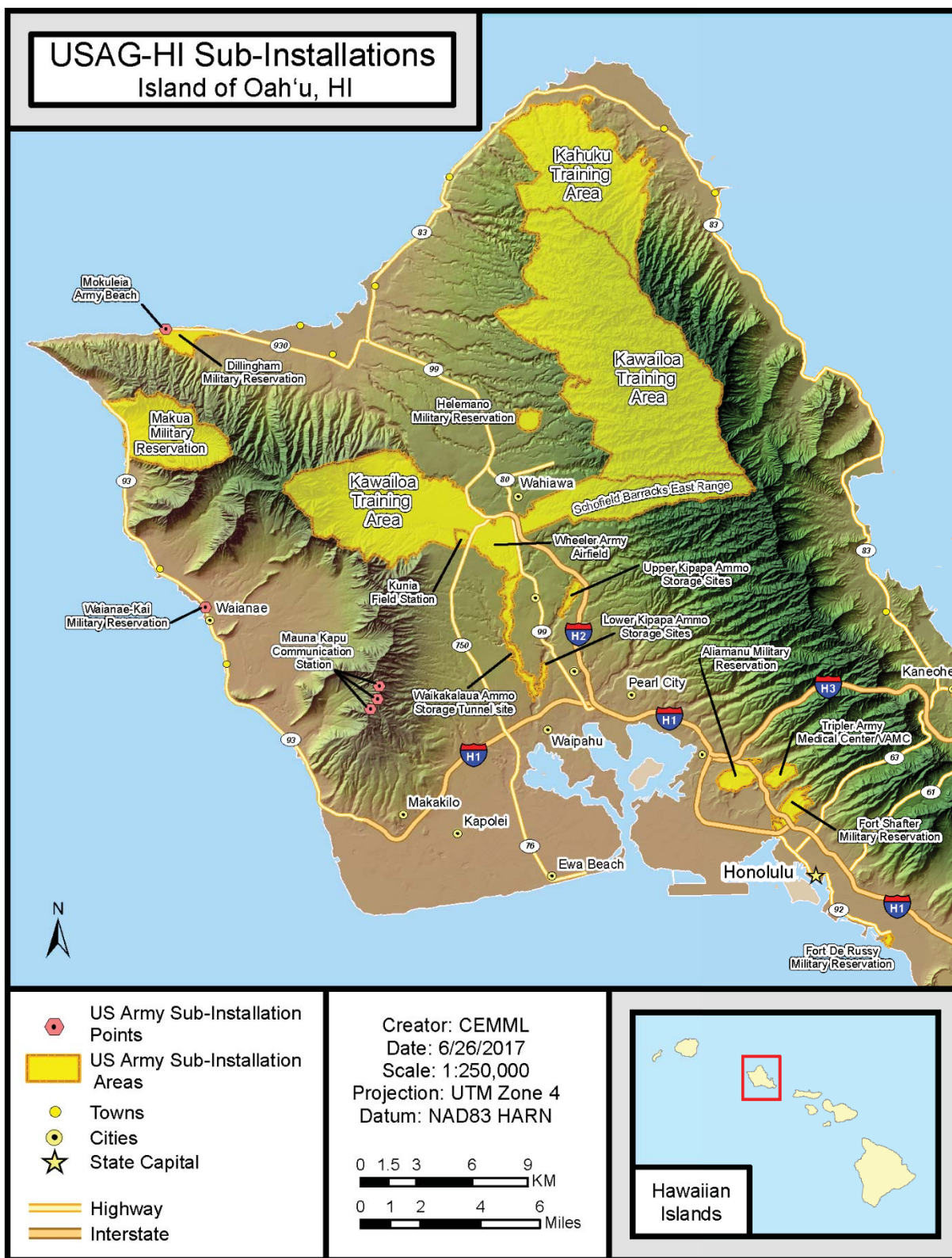


Figure 1-1: Island of O 'ahu Sub-installations

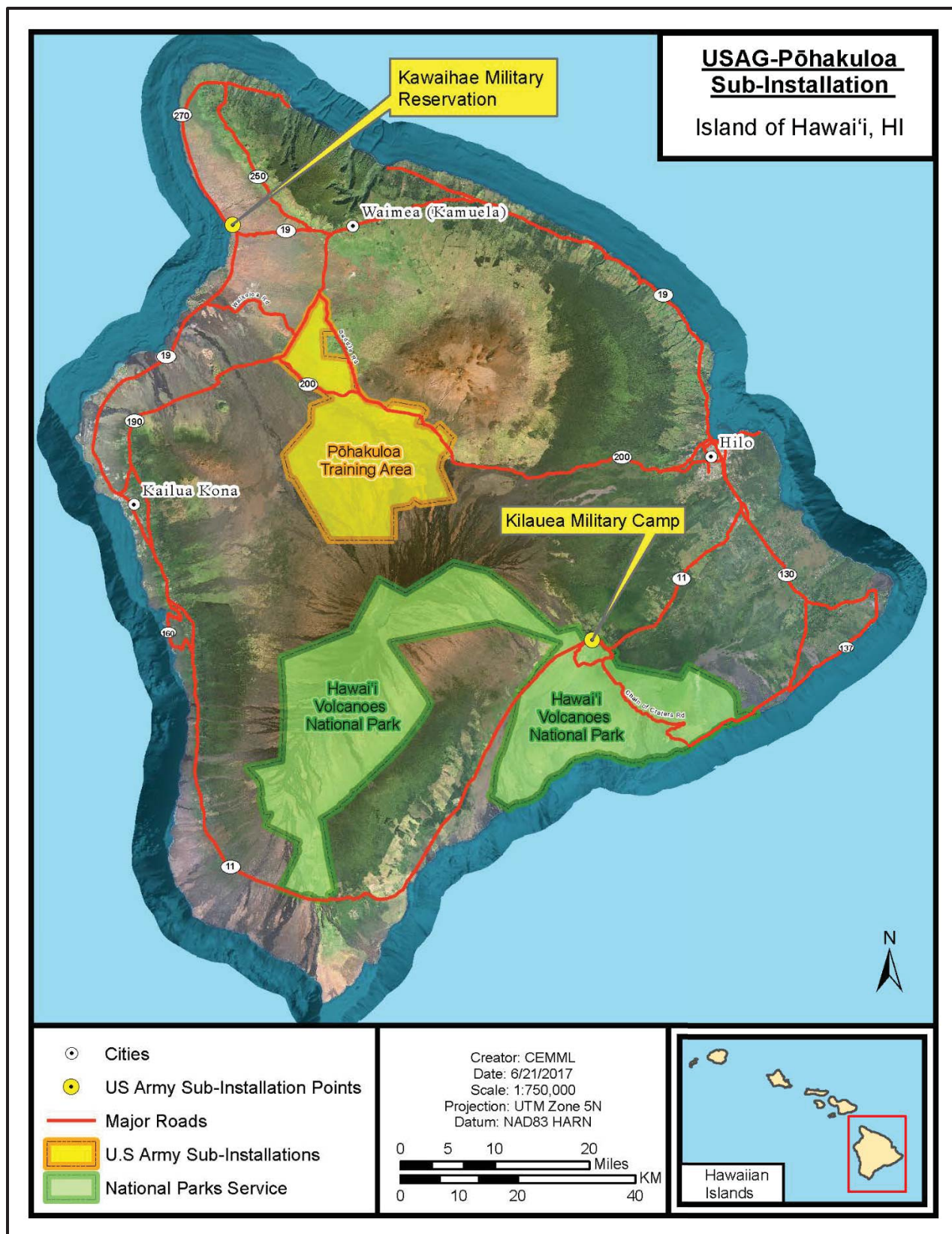


Figure1-2: Island of Hawai'i Sub-installations

1.5 Agency and Public Participation

Public participation in the NEPA process promotes informed decision-making and open communication between the public and the government. Based upon the analysis conducted in this EA, adoption and implementation of both ICRMPs, as written, would not constitute a major federal action significantly affecting the equality of the human environment. A draft Finding of No Significant Impact (FNSI) has been issued along with this EA. These documents, along with the ICRMPs, are being made available for a 30-day comment period, during which time all comments submitted by agencies, organizations, or members of the public on the Proposed Action will be considered.

Notice of public comment periods and availability of the documents are being advertised in the Star-Advertiser, Hawai'i Tribune Herald, and West Hawai'i Today. Individuals and organizations that have expressed interest in cultural resources on Army lands, including Native Hawaiian Organizations (NHOs), will receive notification via email or mail of the availability of the ICRMPs and EA and draft FNSI for public review and comment. All persons, agencies, and organizations, including Native Hawaiian groups, minorities, low income, or disadvantaged individuals, are encouraged to review and provide comments on the EA and draft FNSI. Agency and public participation is an essential and beneficial requirement of the NEPA process. The ICRMPs and the EA and draft FNSI will be sent to the Hawai'i State Historic Preservation Division (SHPD) and the Office of Hawaiian Affairs (OHA). Additionally, the ICRMPs and the EA and draft FNSI will be available on the Army's website:

<https://www.garrison.hawaii.army.mil/NEPA/NEPA.htm>.

Hard copies will be available at the following public libraries:

- Island of O'ahu library locations
 - Honolulu Library
 - Waianae
 - Waialua Library
 - Mililani Library
 - Wahiawā Library
- Island of Hawai'i library locations
 - Hilo Library
 - Kona Library
 - Waimea Library

1.6 Alternatives Considered

Early in the planning process it was determined that no alternatives other than the Proposed Action would satisfy the purpose and need of the proposed project. Two alternatives, the Proposed Action and the No Action Alternative, were evaluated for their potential direct, indirect, and cumulative effects on the human environment. The Proposed Action would involve full implementation of the ICRMPs, as required by law. The No Action Alternative is the continuation of management activities currently being conducted without an ICRMP. If the No Action Alternative was to be selected, the ICRMP would not be implemented, and USAG-HI and USAG-Pōhakuloa would not be in compliance

with DoD and Army regulations. The No Action Alternative analysis within this EA serves as a baseline to compare with the environmental consequences of implementing the Proposed Action. Because implementation of the ICRMP is a regulatory requirement, USAG-HI and USAG-Pōhakuloa did not consider additional alternatives.

CHAPTER 2 DESCRIPTION OF THE PROPOSED ACTION

The Proposed Action is to implement both the USAG-HI ICRMP and USAG-Pōhakuloa ICRMP. The ICRMPs provide direction for routine activities that may impact cultural resources and also guidance for carrying out management activities outlined in the Standard Operating Procedures (SOPs) chapter of the plan. Implementing both ICRMPs promotes:

- USAG-HI and USAG-Pōhakuloa personnel with making informed decisions regarding the cultural resources under their control, resulting in more effective and efficient management of cultural resources.
- USAG-HI and USAG-Pōhakuloa compliance with cultural resource statutes and regulations and other binding commitments.
- Support of the military mission.
- Consistency in application of cultural resource management principles.

2.1 Military Mission and Command Structure

2.1.1 U.S ARMY GARRISON, HAWAI'I (USAG-HI)

The mission for USAG-HI is “The most innovative, customer-focused garrison in the Army, ensuring our supported unit's mission accomplishment and supported community's sustainment.”

USAG-HI manages all Army installations in Hawai'i. USAG-HI provides installation management service and logistical support for approximately 93,700 Soldiers, civilian personnel, military retirees and dependents, and others. Many of USAG-HI's responsibilities are comparable to the operation of a mid-size urban area, with purview over housing, roads, utilities, schools, libraries, recreational facilities and programs, safety and emergency responses, and other amenities that support the mission and both life and work of those on the installation.

The USAG-HI Commander reports to both the Pacific Region of the Installation Management Command-Pacific (IMCOM-PAC) and to the Senior Military Commander of the United States Army, Hawai'i (USARHAW). USAG-HI maintains oversight and support responsibilities for the subordinate, indirect garrison of USAG-Pōhakuloa, and jointly with USAG-Pōhakuloa facilitates cultural resources responsibilities of the Army at Pōhakuloa Training Area (PTA), Kawaihae Military Reservation, and Kīlauea Military Camp (KMC). While USAG-HI is responsible for basic support and management services; there are many military commands and units working within the installations. The activities and requirements of these units affect the demands facing cultural resources management within USAG-HI jurisdiction.

2.1.2 U.S. ARMY GARRISON, PŌHAKULOA (USAG-PŌHAKULOA)

The mission for USAG-Pōhakuloa is to “provide support for single service, Joint, and Combined training to afford warfighters the most realistic and flexible training environment available in the Pacific.”

The USAG-Pōhakuloa Commander has command and control authority for PTA as an indirect Garrison to USAG-HI and reports to both the U.S. Army Pacific (USARPAC) Command and IMCOM-PAC through USAG-HI Command and USARHAW. PTA is the primary tactical training area that provides the United States Pacific Command (USPACOM) Commander with joint/multinational training capabilities to support home-station training, joint training, and enables theater regional engagements. As a remote location, PTA is ideally suited for emergency deployment readiness exercises, regional Joint Reception, Staging, Onward Movement and Integration training, and multinational exercises in support of Theater Security Cooperation Programs and Shaping Operations.

USAG-HI activities support USAG-Pōhakuloa staff with technical oversight, as well as continued administrative and logistical support as USAG-Pōhakuloa grows its capabilities. USAG-Pōhakuloa also has oversight of KMC and Kawaihae Military Reservation and provides cultural resources support for both. The USAG-Pōhakuloa actively supports USAG-HI tenant activities, organizations, and units when they deploy to PTA for training. Tenants are required to notify the CRM of any potential changes to historic properties and to coordinate National Historic Preservation Act (NHPA) Section 106 processes through the USAG-Pōhakuloa Cultural Resources Section.

2.2 Cultural Resources Management

The major goal of a cultural resources program is to “develop and implement procedures to protect against encumbrances to mission by ensuring that Army installations effectively manage cultural resources” (U.S. Army 2007). The USAG-HI and USAG-Pōhakuloa Commanders ensure that USAG-HI and USAG-Pōhakuloa sub-installations meet the general cultural resources requirements assigned. As the leading authority in charge of cultural resources, the Garrison Commanders are specifically designated as the federal agency official for purposes of the NHPA (36 CFR § 800), as the Federal Land Manager for purposes of the Archaeological Resources Protection Act (ARPA) (32 CFR § 229), as the Federal Agency Official with management authority over archeological collections and associated records (36 CFR § 79), and as the Federal Agency Official for purposes of the Native American Graves Protection and Repatriation Act (NAGPRA) (43 CFR § 10).

The USAG-HI cultural resource manager (CRM) is appointed by the USAG-HI Commander. The USAG-Pōhakuloa CRM is appointed by the USAG-Pōhakuloa Commander. CRMs provide day-to-day management of cultural resources and ensure that all installation activities are in compliance with applicable cultural resources requirements, serve as liaisons between all persons involved in implementing the ICRMP, and carry out the cultural resource management activities as outlined in the SOPs.

2.3 ICRMP Implementation

2.3.1 ICRMP GOALS

Both ICRMPs provide the necessary authority to manage the cultural resources contained within all 22 sub-installations. ICRMPs are reviewed and updated every year to ensure accuracy, and revised approximately every five years as needed. The overall purpose of an ICRMP is to incorporate guidelines and consolidate procedures for cultural resources management into a single document to more efficiently fulfill management responsibilities. The USAG-HI and USAG-Pōhakuloa ICRMPs share the following goals:

- Meet USAG-HI and USAG-Pōhakuloa obligations for compliance with NHPA, NEPA, NAGPRA, ARPA and other legal requirements in an efficient and effective manner consistent with DoD standards while minimizing effects on the military mission.
- Enforce federal laws that prohibit vandalism of cultural resources on federal properties through law enforcement, monitoring, and public awareness.
- Ensure that current and planned installation programs, plans, and projects are integrated with cultural resources management initiatives.
- Identify and evaluate cultural resources eligibility for inclusion in the National Register of Historic Places (NRHP) and maintain an up-to-date inventory of historic properties.
- Avoid or minimize adverse effects on historic properties that meet eligibility criteria for inclusion in the NRHP.
- Preserve significant historic properties whenever possible and mitigate in accordance with the outcome of consultation in the long-term public interest when adverse effects cannot be avoided.
- Ensure that appropriate consultation procedures are followed at the earliest planning stage of any undertaking that may affect historic properties.
- Maintain a cultural resources program staff that meets the *Secretary of the Interior Professional Qualification Standards* (36 CFR §61).
- Maintain confidentiality regarding the nature and location of cultural resources unless the federal agency determines that it would not create a risk of harm to the sites and would further the purposes of ARPA.
- Maintain curation of archaeological collections and records, and orderly control of the technical libraries and associated records needed to support the Cultural Resources Sections pursuant to 36 CFR § 79.

2.3.2 ICRMP OBJECTIVES

The planning objectives for both ICRMPs are to improve coordination between proponents and CRMs and encourage use of the DPW GIS for more reliable exchange of planning information among programs. Compiling and maintaining the locations, extent, and important attributes of each known cultural resource will help the Cultural Resources Sections to provide the best available current data for all planners within both USAG-HI and USAG-Pōhakuloa sub-installations.

The ICRMPs provide direction for routine activities that may impact cultural resources by establishing SOPs, identifying various public consultation requirements, and providing goals that

would benefit the management of cultural resources on Garrison lands. The ICRMPs do not detail site-specific individual projects. Consistent with NEPA and other applicable statutes and regulations, additional NEPA analysis will be needed to analyze any impacts prior to proceeding with specific projects or installation training activities that may affect environmental, social, and/or economic resources.

If the preferred alternative is chosen, USAG-HI and USAG-Pōhakuloa CRMs will play a primary role in implementing the ICRMPs. The ICRMPs provide guidance for the CRMs to coordinate compliance with historic preservation laws and Army regulations on behalf of each Garrison Commander. The following objectives include all of the tasks required to plan, organize, and implement both ICRMPs:

- Complete reasonable and good faith archaeological and cultural resource inventory surveys in areas not adequately surveyed, as needed, to support training and other projects and missions.
- Conduct regular education regarding cultural resources and procedures related to them for:
 - Military personnel newly assigned to USAG-HI or USAG-Pōhakuloa.
 - Planners, project proponents, and others whose programs and actions have high potential for affecting cultural resources.
 - Members of the public who are intended to benefit from historic properties and other cultural resources.
- Improve coordination in compliance review of undertakings with emphasis on timely and effective coordination between proponents and the CRM.
- Encourage use of Directorate of Public Works (DPW)-wide Geographic Information System (GIS) for more effective and reliable exchange of planning information among programs.
- Compile and validate cultural resources spatial data in Spatial Data Standards for Facilities, Infrastructure, and Environment-compliant GIS applications.
- Compile and validate archaeological site inventory (USAG-Pōhakuloa) and Real Property Planning and Analysis System (RPLANS) data (USAG-HI).
- Complete evaluations of buildings and structures 50 years of age or older.
- Compile and validate NRHP Historic Status codes for all existing RPLANS-listed assets.
- Prepare Historic Structure Reports and/or Treatment Plans for the care and maintenance of NRHP eligible historic buildings, structures, and districts.
- Develop Programmatic Agreements with State Historic Preservation Division (SHPD) for general operations, maintenance, and development.
- Develop Programmatic Agreements with SHPD for routine training activities in training areas.
- Provide information about the USAG-HI and USAG-Pōhakuloa Cultural Resources Sections to the Public Affairs Office for inclusion in publically available websites. Website(s) should include information about cultural resources, the program, and policies, as well as current updates on major projects under review and information supporting consultations.
- Maintain an active public outreach program, especially serving military personnel, through brochures, trifolds, posters, access to historic properties, and outreach activities involving other state agencies and private organizations, schools, and the Native Hawaiian community.
- Pro-actively consult with Native Hawaiian organizations and other interested parties in accordance with DoD and Department of the Army guidance.
- Create and maintain a records management system for historic properties identified on Garrison-controlled lands, Section 106 files, and contractual documents.

- Fully integrate ICRMP actions into Integrated Natural Resources Management Plans (INRMPs), Master Planning and U.S. Army Hawai'i Training Support Systems (USARHAW TSS) range plans.

2.3.3 STANDARD OPERATING PROCEDURES

Standard Operating Procedures (SOPs) provide direction for routine activities that may have an impact on cultural resources. Each SOP identifies relevant regulations that the Garrison must follow to maintain regulatory compliance. The SOPs detailed in the ICRMPs address specific situations that are likely to occur and provides steps for the implementation and notification requirements for each event type. The following SOPs are included in both the USAG-HI and USAG-Pōhakuloa ICRMPs:

- **SOP 1:** Compliance Procedures for NHPA 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 Grave Protection and Repatriation Act (NAGPRA): Planned activities and comprehensive agreements
- **SOP 6:** Archaeological Resources Protection Act (ARPA) of 1979 Compliance Procedures
- **SOP 7:** Native Hawaiian Consultation
- **SOP 8:** Archaeological Collections Curation and Management
- **SOP 9:** Maintenance Procedures for Historic Buildings and Structures

2.3.4 FIVE-YEAR MANAGEMENT PLANS

USAG-HI

Over the next five years (FY 2017-2021), USAG-HI expects to have undertakings that could potentially affect historic properties. These potential undertakings include routine maintenance and operations of historic buildings and ranges, construction projects, natural resources management activities, and recurring training exercises. Proponents for such undertakings include USARHAW TSS, USAG-HI and USAG-Pōhakuloa DPW, and other tenant organizations. Table 2-1 includes several such projects that USAG-HI is currently tracking that could begin within the next five years. Project planning and decision-making will involve additional environmental review to consider any potential resource impacts from the following individual projects:

Table 2-1: USAG-HI Projects for the Five-Year Planning Period (FY 2017-2021)

Sub-Installation	Proposed Project
Schofield Barracks	Construction of Company Operations Facilities and associated structures at SB 9000 Block

Sub-Installation	Proposed Project
Schofield Barracks East Range	Construction and use of training areas associated with the Jungle Operations Training Center
Wheeler Army Airfield	Adapted re-use of National Historic Landmark (NHL) Wheeler Army Airfield hangers if facility no longer meets mission standards for aviation use
Tripler Army Medical Center	Renovations of Tripler Army Medical Center
Schofield Barracks	Continue use/renovations of SB Woodies for long-term sustainability

USAG-Pōhakuloa

Over the next five years (FY 2017-2021), USAG-Pōhakuloa expects to have undertakings that could potentially affect historic properties. These potential undertakings include routine maintenance and operations of historic buildings and ranges, construction projects, natural resources management activities, and recurring training exercises. Proponents for such undertakings include USARHAW TSS, USAG-HI and USAG-Pōhakuloa DPW, and other tenant organizations. Table 2-2 includes several such projects that USAG-Pōhakuloa is tracking and that could begin within the next five years. Project planning and decision-making will involve additional environmental review to consider any potential resource impacts from the following individual projects:

Table 2-2: USAG-Pōhakuloa Projects for the Five-Year Planning Period (FY 2017-2021)

Sub-Installation	Proposed Project
Pōhakuloa Training Area	Keamuku Range Roads - Garrison MSR - Troop Construction
Pōhakuloa Training Area	Access Control Point and MP Station
Pōhakuloa Training Area	Aviation Gunnery Range
Pōhakuloa Training Area	Qualification Training Range
Pōhakuloa Training Area	Road paving projects

2.3.5 STAFFING

Full implementation of the USAG-HI and USAG-Pōhakuloa ICRMPs requires full-time cultural resources positions with technical assistance from partners, cooperators, and contractors. These

positions are already staffed; therefore, implementation of either the USAG-HI or the USAG-Pōhakuloa ICRMP will not require additional staffing.

2.3.6 PARTNERS AND COORDINATION

Department of Defense Instruction 4715.16 states “Consult in good faith with internal and external stakeholders and promote partnerships to manage and maintain cultural resources by developing and fostering positive partnerships with Federal, tribal, State, and local government agencies; professional and advocacy organizations; and the general public.” Outside agencies are those organizations, stakeholders, or interested parties that are directly involved with cultural resource management on USAG-HI and USAG-Pōhakuloa holdings. At a minimum, CRMs from both USAG-HI and USAG-Pōhakuloa consult with the following organizations:

- Hawai‘i SHPD
- Advisory Council on Historic Preservation
- NHOs
 - Hawai‘i Island Burial Council
 - O‘ahu Island Burial Council
 - Other Native Hawaiian organizations
- Historic Hawai‘i Foundation
- Hawai‘i State OHA
- National Park Service (NPS)

CHAPTER 3 ALTERNATIVES CONSIDERED

3.1 Alternatives Considered

This EA analyzes two alternatives: full implementation of the USAG-HI and USAG-Pōhakuloa ICRMPs and a No Action Alternative. The Proposed Action, implementation of both USAG-HI and USAG-Pōhakuloa ICRMPs, is the preferred alternative. Preparation and full implementation of both ICRMPs are a requirement of DoDI 4715.16 and AR 200-1. Other alternatives, including partial implementation of an ICRMP, were dismissed due to violation of Army regulations.

3.2 No Action Alternative

CEQ regulations (40 CFR 1502.14) require the alternatives analysis to include a No Action Alternative. Section 1502.14(d) of CEQ regulations interprets the update or creation of land management plans, including ICRMPs, to be considered a “no change” alternative verses a “no action” alternative. A “no change” alternative simply means there is no change from current management direction or level of management intensity (CEQ, 1981). Ongoing programs initiated under existing legislation and regulations will continue, even as new plans are developed (CEQ, 1981). USAG-HI and USAG-Pōhakuloa need to prepare and implement ICRMPs in order to maintain compliance with cultural resources management rules and regulations. The analysis within this EA for the No Action (i.e., “no change”) Alternative serves as a baseline for comparison of the environmental consequences of implementing the Proposed Action.

CHAPTER 4 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

4.1 Introduction

This section describes the current condition of the affected environment followed by the environmental consequences of both the Proposed Action and No Action Alternative on each resource. This EA's use of the term "environment" encompasses the physical, biological, cultural, and social aspects that are potentially subject to impacts from implementing an alternative. The description of existing conditions provides the baseline for identifying and evaluating any change that may result from implementation of an alternative. The environmental consequences analysis describes the potential change or impact that could occur to each resource.

4.2 Environmental Factors Not Analyzed in this EA

The following factors are typically considered in environmental analyses, but were not assessed for the Proposed Action and No Action Alternative. Implementation of both ICRMPs will not result in quantifiable, concrete impacts to the resources listed below.

- Coastal Zone Management
- Climate
- Water Quality
- Geology and Geography (except soils)
- Economy
- Hazardous Waste Site Contamination and Cleanup
- Infrastructure
- Noise
- Prime Farmland
- Wild and Scenic Rivers

4.3 Environmental Factors Analyzed in this EA

The following environmental factors have the potential to be impacted and therefore are included in this EA for analysis of the Proposed Action and the No Action Alternatives.

- Military Mission and Land Use
- Air Quality
- Soils
- Water Resources
- Native Ecosystems and Biological Diversity
- Threatened and Endangered Species
- Invasive Species
- Cultural Resources
- Aesthetic and Visual Resources

- Socioeconomics, Protection of Children and Private Property and Environmental Justice
- Cumulative Effects
- Irreversible and Irretrievable Commitment of Resources

4.3.1 MILITARY MISSION AND LAND USE

USAG-HI

The USAG-HI mission is “Supporting each Warrior, Family and Community with sustainable services, ensuring power projection readiness from Hawai‘i” (USAG-HI 2016).

USAG-HI’s 19 sub-installations occupy significant portions of the island of O‘ahu, particularly the central plateau and the northern Ko‘olau Range. Fort Shafter Military Reservation (FSMR), Āliamanu Military Reservation (AMR), Tripler Army Medical Center (TAMC), and Fort DeRussy Military Reservation (FDR) are all located on the southern portion of O‘ahu. Mākua Military Reservation (MMR) and Wai‘anae-Kai Military Reservation (WMR) are located on the leeward coast of O‘ahu. Dillingham Military Reservation (DMR) and Mokolē‘ia Army Beach (MAB) are located on the north shore of O‘ahu at the base of the Wai‘anae Range. Schofield Barracks Military Reservation (SBMR), including cantonment and training ranges, is situated at the crest of the central O‘ahu plateau. On the southern slope of the plateau are Wheeler Army Airfield (WAAF), Field Station Kunia (FSK), the Kīpapa Ammunition Storage Site (KAS), and the Waikakalaua Ammunition Storage (WAST) site. On the northern slope of the plateau is the Helemano Military Reservation (HMR) and the Pūpūkea-Pa‘ala‘a-Uka Military Road. Kahuku Training Area (KTA) and Kawaihoa Training Area (KLOA) are located in the northern Ko‘olau Mountains, and the Mauna Kapu Communication Station (MKS) is in the southern Wai‘anae Mountains. See Figure 1-1 for USAG-HI sub-installation locations.

USAG-Pōhakuloa

The USAG-Pōhakuloa mission is to “provide support for single service, Joint, and Combined training to afford warfighters the most realistic and flexible training environment available in the Pacific Region.”

PTA is located in the north-central portion of the island, west of the Humu‘ula Saddle, in an area formed by the convergence of three volcanic mountains: Mauna Kea, Mauna Loa, and Hualālai (INRMP-Pōhakuloa 2010). KMC is located within Hawai‘i Volcanoes National Park. USAG-Pōhakuloa owns the buildings while the National Park Service (NPS) owns the land; therefore, NPS has some ongoing responsibility for the management and care of cultural resources on that installation (USAG-Pōhakuloa ICRMP 2017). Kawaihae Military Reservation is located on the leeward west coast of the island of Hawai‘i (USAG-Pōhakuloa ICRMP 2017). See Figure 1-2 for USAG-Pōhakuloa sub-installation locations.

Table 4-1: USAG-HI and USAG-Pōhakuloa Sub-installations Analyzed in This EA

USAG-HI		
Facility	Primary Function	Size (acres)
Āliamanu Military Reservation (AMR)	Military family housing	589.4
Dillingham Military Reservation (DMR)	Training and airfield	618.1
Field Station Kunia (FSK)	Administrative, communications, storage and recreation	31.5
Fort DeRussy Military Reservation (FDR)	U.S. Army Museum of Hawai‘i, and military and civilian recreation	68.6
Fort Shafter Military Reservation (FSMR)	9 th U.S. Army Reserve Command headquarters, Support command and control Army organizations and management of on-ground defense of the Pacific theater	596.1
Helemano Military Reservation (HMR)	125 th Signal Battalion Headquarters and military personnel housing	288.9
Kahuku Training Area (KTA)	Troop maneuver and training	9,493.3
Kawailoa Training Area (KLOA)	Limited use of helicopter landing zones and roads	23,539.4
Kīpapa Ammunition Storage Site (KAS)	Tsunami and earthquake detection station with limited regional ammunition storage	3,74.4
Mākua Military Reservation (MMR)	Training	4,280.4
Mauna Kapu Communication Station Site (MKS)	Communications	16.14
Mokulēia Army Beach (MAB)	Recreation	26.4
Pililā‘au Army Recreation Center (PARC) within Wai‘anae Kai Military Reservation (WMR)	Recreation	13.52

USAG-HI		
Facility	Primary Function	Size (acres)
Pūpūkea-Pa‘ala‘a-Uka Military Road (Drum Road) (DRD)	Major transportation hub	109.25
Schofield Barracks Military Reservation (SBMR) (Includes training areas and a cantonment: Schofield Barracks East Range, South Range, West Range, and Schofield Barracks Cantonment)	Post for 25 th Infantry Division and training center	17,428.26
Signal Cable Trunking System	Inactive	0.10
Tripler Army Medical Center (TAMC)	Medical treatment	360.6
Waikakalaua Ammo Storage (WAST)	Inactive	176.1
Wheeler Army Airfield (WAAF)	Training and aviation support	1,588.0
USAG-Pōhakuloa		
Facility	Primary Function	Size (acres)
Pōhakuloa Training Area (PTA)	Training	132,268
Kawaihae Military Reservation	Transportation and cargo hub	11
Kīlauea Military Camp (KMC)	Recreation	72 ¹

4.3.1.1 PROPOSED ACTION

The Proposed Action will have a beneficial effect on land use at USAG-HI and USAG-Pōhakuloa facilities. The ICRMPs provide procedures and guidance for events in which land use would have the potential to adversely affect cultural resources and ensure that events are coordinated with the CRM

¹ 72 acres is reported in the HQIIS, but other Department of the Army datasets and National Park Service records report different acreages for KMC.

before actions are taken. The ICRMPs require the Cultural Resources Section to coordinate with land managers before undertaking any archaeological activities that might have the potential to negatively affect the land.

The Proposed Action would have a beneficial impact on USAG-HI and USAG-Pōhakuloa missions during the planning period. Implementation of both ICRMPs would help complete the mission by maintaining Garrison sub-installation compliance with DoDI 4715.16 and AR 200-1. A planning objective of the ICRMPs is to conduct archaeological inventory surveys in areas not adequately surveyed to support training and other projects for the mission. Military training can involve excavations, earth-moving activities, detonation of ordnances, and wildland fire operations, all of which can have a severe impact to the surface and subsurface archaeological record. If during these activities a previously unidentified archaeological resource is found, regulations require that the activity must cease and the CRM has to be notified. Implementation of the ICRMPs would reduce this risk by recommending priority areas for survey and organizing the process for conducting surveys to identify archaeological resources, or areas with high potential for resources, that could be avoided for certain training exercises. Furthermore, the ICRMPs establish standard operating procedures to follow in the event of an inadvertent or unanticipated discovery. ICRMPs are also a mechanism for enhanced education and coordination with military units and other project proponents.

4.3.1.2 NO ACTION ALTERNATIVE

The No Action Alternative would continue with existing management practices. USAG-HI and USAG-Pōhakuloa Cultural Resources Sections currently conduct inventories and evaluations of cultural resources and provide coordination and education between management units. The ICRMPs improve upon these processes by organizing and prioritizing survey, coordination, and educational needs.

Without a coherent and efficient process for coordination between management units, there is an increased risk for inadvertent discoveries and/or damage to cultural resources during training exercises. Interruptions to training and the mission could occur, resulting in a potential lack of troop readiness and negatively impacting the military mission.

4.3.2 AIR QUALITY

According to the Hawai'i Department of Health, Hawai'i enjoys some of the best air quality in the nation. Hawai'i complies with the National Ambient Air Quality Standards, set by the Environmental Protection Agency (EPA) to protect health and welfare from harmful effects of certain commonly occurring pollutants including: carbon monoxide, lead, nitrogen dioxide, particulate matter, ozone, sulfur dioxide, and hydrogen sulfide (EPA 2016). Areas are either designated as "attainment" for meeting the ground-level ozone standards or "nonattainment" for not meeting ground-level ozone standards (EPA 2016).

A negative impact to air quality would be any increase in commonly occurring pollutants that would cause adverse effects to human health and welfare and have the potential for an area to be designated as "nonattainment."

USAG-HI

A report created by the EPA's NEPAassist program, January 2017, shows that the entire island of O'ahu is in attainment.

USAG-Pōhakuloa

A report created by the EPA's NEPAassist program, January 2017, shows that the entire island of Hawai'i is in attainment. On the island of Hawai'i, sulfate volcanic emissions reacting with oxygen and moisture in the presence of sunlight form a type of air pollution called "vog," which can temporarily impact island residents. Vog concentrations are dependent on the amount of volcanic emissions, the distance away from the source vents, and the wind speed and direction, and can change drastically on any given day (Hawai'i DOH 2016).

4.3.2.1 PROPOSED ACTION

Implementation of the ICRMPs would not have a regional or statewide impact on air quality. Archaeological surveys and routine maintenance activities conducted during the ICRMPs' planning periods could have the potential to release fugitive dust particles and emissions resulting in negligible short-term effects, but would not foreseeably cause adverse effects to human health and welfare, nor cause any area within an installation to be in "nonattainment."

4.3.2.2 NO ACTION ALTERNATIVE

Air quality would remain in its current condition, in attainment, under the No Action Alternative.

4.3.3 SOILS

The soils of Hawai'i are reflective of the volcanic history of the state, but can vary drastically between islands. Ten soil orders are represented on the Hawaiian Islands (Deenik and McClellan 2007). Rainfall and the amount of time the surface is exposed to weathering play a large role in the soil type of a particular area.

Negative impacts can come in the form of soil compaction, loss of soil structure, soil degradation (e.g., decline in soil quality), and erosion.

USAG-HI

There are seven soil associations on O'ahu which reflect the volcanic history of the area (INRMP-O'ahu 2010). In the mountainous areas and low slopes of the Wai'anae Range, Mahana, Kolekole, Hālawa, Helemano, Kemoo, Kawaihāpai, and Alaka'i soil types can be found (INRMP-O'ahu 2010).

Soil erosion can be locally significant and considered severe in areas where natural drainages and gulches occur (INRMP-O'ahu 2010). Due to the high shrink-swell potential of soils, erosion can be significant where slopes are steep (INRMP-O'ahu 2010). Exposed lava, dry climate, and lack of permanent streambeds may play a role in reducing erosion (INRMP-O'ahu 2010).

USAG-Pōhakuloa

Approximately 80% of PTA is covered by *pāhoehoe* lava, *a'a* lava, and miscellaneous land types (e.g., *pu'us*) (INRMP-Pōhakuloa 2010). Soils are poorly developed and soil erosion is less of an issue on the island of Hawai'i as compared to O'ahu due to the limited amount of soil present. The exception is the northern tier of training areas and northern and western portion of the installation where deep soils can be found (INRMP-Pōhakuloa 2010).

Water erosion on PTA is generally low due to gentle slopes, low soil erosion potential, and low intensity, gentle rainfalls (INRMP-Pōhakuloa 2010). Areas where soils are well-developed have greater potential for soil erosion caused by water and wind (INRMP-Pōhakuloa 2010). Due to inadequate drainage, significant erosion occurs next to roadways (INRMP-Pōhakuloa 2010).

4.3.3.1 PROPOSED ACTION

Implementing the ICRMPs would not result in soil degradation or loss of soil structure. Archaeological surveys and routine maintenance could result in small-scale disturbances to soil, but effects would be negligible and easily remediated if necessary.

4.3.3.2 NO ACTION ALTERNATIVE

Under the No Action Alternative, soil resources would remain unchanged. Archaeological surveys and routine maintenance are ongoing, and the risk for small-scale disturbances to soil exists.

4.3.4 WATER RESOURCES

Water resources can include, but are not limited to, streams, wetlands, lakes, ponds, ocean, and groundwater. Negative impacts to water resources can come in the form of increased sediment and nutrients, changes in temperature, and/or decrease in water quality.

USAG-HI

High level water bodies and basal water bodies are the main sources of groundwater on O'ahu (INRMP-O'ahu 2010). Basal water bodies are created from fresh water derived from infiltration of rainfall, typically from 0 to 40 feet elevation (INRMP-O'ahu 2010). High level water bodies are created from the impounding and accumulation of water in dikes with low permeability (INRMP-O'ahu 2010). The Schofield High Level Water Body, located west of the Wai'anae Mountains, is the major water source for O'ahu installations (INRMP-O'ahu 2010).

The Waikōloa Gulch and the Waikele Stream serve as the primary drainages for SBMR (INRMP-O'ahu 2010). Along the northeast boundary of SBMR flows the North Fork of the Kaukonahua Stream, along with two tributaries (INRMP-O'ahu 2010). Many streams on SBMR are intermittent, meaning they typically only flow during the wet season and remain dry during the dry season. All streams on SBMR flow into the Pacific Ocean at Waialua, except for the Waikele, which flows into Pearl Harbor from the north (INRMP-O'ahu 2010). Plants and animals are sustained by rainfall, fog drip, and occasional frost (INRMP-O'ahu 2010).

USAG-Pōhakuloa

Pōhakuloa training lands do not have any surface streams, lakes, or other bodies of water (INRMP-Pōhakuloa 2010). Intermittent stream channels dry quickly after rainfall (INRMP-Pōhakuloa 2010). Rainfall and other water typically leave the site through crevices in the lava to subterranean areas (INRMP-Pōhakuloa 2010).

4.3.4.1 PROPOSED ACTION

The Proposed Action will have a beneficial effect on water resources on USAG-HI and USAG-Pōhakuloa managed lands. The planning objectives for both ICRMPs are to improve coordination between proponents and CRMs and encourage the use of the DPW GIS for more reliable exchange of planning information among programs. Reliance on standardized GIS data will allow the Cultural Resources Sections to identify the location of water resources, including intermittent streams, and will ensure that measures are taken to avoid adverse effects to water resources.

4.3.4.2 NO ACTION ALTERNATIVE

Existing water management under the No Action Alternative would remain the same. The Cultural Resources Sections actively coordinate their activities with the Natural Resources Program to reduce risk of negative impacts to water resources.

4.3.5 NATIVE ECOSYSTEMS AND BIOLOGICAL DIVERSITY

The Hawaiian Islands support some form of native ecosystems, but more than half of the land is overrun by non-native species. Non-native species can alter the characteristics of native ecosystems and are potential threats to its natural integrity. Cultivation, landscaping, human encroachment, and habitat destruction are all actions that have contributed to the replacement of native ecosystems by non-native-dominated communities.

Biological diversity is defined as the number and variety of species found within a specified geographic region. Hawai'i is one of the most diverse archipelagic regions on earth and has a wide variety of habitats and microclimates in which species can flourish. The Hawaiian Islands are home to a large number of native species, which are an important part of Hawaiian culture.

Past and present military activities have affected native ecosystems and biological diversity through the increase of non-native plant species and habitat destruction. The DoD acknowledged this impact and has implemented an ecosystem-based management approach with the goals of maintaining and improving native ecosystems and the biological diversity of terrestrial and aquatic ecosystems (DoDI 4715.3).

Biological diversity can be affected and potentially limited by the availability of water, nutrients, and space through habitat destruction and the introduction of non-native species

USAG-HI

The 19 Army sub-installations on O‘ahu are host to a wide variety of ecological zones, defined by elevation, topography and prevailing ecological conditions and their associated flora and fauna. The sub-installations are a combination of communities classified as native and non-native vegetation, lowland dry, upland shrub, lowland mesic, montane wet, mixed bog, mixed fern/shrub, aquatic natural, and forested.

USAG-Pōhakuloa

The sub-installations on the island of Hawai‘i host specialized habitats. PTA is a volcanic desert in the lee of Mauna Kea with many cave and lava tube formations. Kawaihae Military Reservation is on the leeward coast of the Hawai‘i Island and is characterized as a marine environment. KMC is in close proximity to and on the leeward side of the volcano and therefore is subject to vog.

In 2013, a vegetation map was created for PTA following the United States National Vegetation Classification System. This mapping effort classified PTA as having 12 vegetation alliances and is dominated by shrubland and woodland land cover types (Block et. al 2013). There are over 30 plant communities, with ~ 300 plant species, identified on PTA (INRMP-Pōhakuloa, 2010). The oldest and most complex of these communities are found in the *kīpukas* (INRMP-Pōhakuloa 2010). These communities range from little to no plant cover, mostly due to lava flows, to species-rich communities (INRMP-Pōhakuloa 2010).

4.3.5.1 PROPOSED ACTION

Implementing the ICRMPs will have a beneficial effect on native ecosystems and biological diversity. The planning objectives for both ICRMPs are to improve coordination between proponents and CRMs and encourage the use of the DPW GIS for more reliable exchange of planning information among programs. Reliance on standardized GIS data will allow the Cultural Resources Sections to identify the location of sensitive ecosystems and resources and will ensure that measures are taken to avoid adverse effects to native ecosystems and biological diversity. Improved coordination provides the Natural Resources Program an opportunity to advise on best management practices to avoid negative impacts to these sensitive resources.

4.3.5.2 NO ACTION ALTERNATIVE

Existing ecosystem management under the No Action Alternative would remain the same. The Cultural Resources Sections actively coordinate their activities with the Natural Resources Program to reduce risk for negative impacts on native ecosystems and biological diversity.

4.3.6 THREATENED AND ENDANGERED SPECIES

The Garrison’s Natural Resources Program is responsible for managing over 100 of the 400 federally listed threatened and endangered species and their critical habitat in Hawai‘i (USAG-HI NRP n.d.). The species managed by the Natural Resources Program represent some of the planet’s rarest

species, and a majority can only be found on the Hawaiian Islands (USAG-HI NRP n.d.). Some species may be restricted to a single island, and, in some instances, restricted to certain mountain ranges, and many can only be found on Garrison-managed Army lands on the Hawaiian Islands (USAG-HI NRP n.d.). The Natural Resources Program applies an ecosystem-based approach to manage its training lands to restore and protect species and their habitats (USAG-HI NRP n.d.).

The Garrison's Natural Resources Program has developed "implementation teams" that consist of expert biologists from conservation agencies and landowners in Hawai'i to help manage the high number of endangered species on and around Army lands (USAG-HI NRP n.d.). Together, the implementation teams develop implementation plans that describe the actions necessary to stabilize the Army's threatened and endangered species and their habitats (USAG-HI NRP n.d.). By achieving species and habitat stabilization, the Garrison can effectively move species from existing in a state of jeopardy to a state of stability (USAG-HI NRP n.d.).

The Hawai'i Biodiversity and Mapping Program (formerly known as the Hawai'i Natural Heritage Program) maintains a comprehensive database and distribution records of Hawai'i's sensitive species, including those found on Garrison training lands.

USAG-HI

The Nature Conservancy (TNC) of Hawai'i and the Hawai'i Biodiversity and Mapping Program have classified the impact area west of Schofield Barracks, high in the Wai'anae Mountains, as having "extraordinary biological significance" (R.M. Towill Corp. 1997, as cited in INRMP-O'ahu 2010). USAG-HI has documented 114 listed species and 12 proposed endangered species on O'ahu training lands (INRMP-O'ahu 2010). Only one federally listed bird species, O'ahu 'elepaio (*Chasiempis sandwichensis ibidis*), has USFWS designated critical habitat on Schofield Barracks Military Reservation (INRMP-O'ahu 2010).

USAG-Pōhakuloa

Since 1997, Pōhakuloa has conducted annual surveys and monitors for the presence of federally listed species (USAG-HI 2007). Personal communication with USAG-Pōhakuloa staff verifies that annual threatened and endangered species reports are created every year with up-to-date surveys (J. Taomia, personal communication, 21 February 2017 and Lena Schnell, personal communication, 02 June, 2017). To date, these studies have identified 25 endangered, one threatened, and six proposed endangered species on USAG-Pōhakuloa training lands.

4.3.6.1 PROPOSED ACTION

Implementation of the ICRMPs will have a beneficial effect on threatened and endangered species. Archaeological inventory surveys, evaluation of buildings that are 50 years or older, and routine maintenance could occur under the direction of the ICRMPs. These activities may involve localized ground disturbances with the potential to affect threatened and endangered species. However, the ICRMPs streamline the coordination process that occurs between the Cultural Resources Sections and the Natural Resources Program to identify areas where threatened and endangered species exist

and avoid negative effects. Improved coordination would also ensure that the requirements of a Biological Opinion² are adhered to during cultural resources management activities.

4.3.6.2 NO ACTION ALTERNATIVE

Existing threatened and endangered species management under the No Action Alternative would remain the same. The Cultural Resources Sections actively coordinate their activities with the Natural Resources Program to reduce risk of adverse impacts to sensitive species.

4.3.7 INVASIVE SPECIES

Invasive species are characterized as species that can outcompete native species for light, space, nutrients, and/or water and require control or eradication. Invasive species can directly or indirectly affect native species by modifying or replacing individual species and/or native ecosystems and interfere with the military mission. Invasive species management is a top priority for the DoD to mitigate adverse impacts from authorized military readiness activities on DoD lands and to minimize the economic, ecologic, and human health impacts that invasive species may cause (EO 13751). Military installations are required to monitor invasive species populations, track the presence over time to determine when control measures are necessary, and to evaluate the effectiveness of prevention, control/eradication, and restoration measures (EO 13751).

USAG-HI and USAG-Pōhakuloa

Numerous invasive plants, mammals, birds, fish, terrestrial and aquatic invertebrates, and herpetofauna occur on USAG-HI and USAG-Pōhakuloa managed lands (INRMP-O'ahu 2010). The invasive species program for each sub-installation spends a considerable amount of time and resources to detect and manage invasive species to reduce negative impacts to sensitive species, the environment, and training operations.

4.3.7.1 PROPOSED ACTION

ICRMP implementation will have a beneficial effect on the management of invasive species. Archaeological surveys and routine maintenance activities have the potential to spread invasive species through the removal of native vegetation and by localized ground disturbance. However, fully implemented management plans can help reduce the chance of invasive species spread from cultural resources activities by improving coordination between the management units. Coordinating activities will allow the Natural Resources staff to identify weedy species in action area, offer advice on how to reduce potential spread, monitor for infestations, and implement control/eradication measures in the event an invasion occurs.

² A Biological Opinion is prepared by the United States Fish and Wildlife Service stating whether a project or proposed activity is likely to jeopardize the continued existence of a listed species or result in the destruction or adverse modification of critical habitat (USFWS 2017).

4.3.7.2 NO ACTION ALTERNATIVE

Invasive species management under the No Action Alternative would remain the same. The Cultural Resources Sections actively coordinate their activities with the Natural Resources Program to reduce risk of invasions as directed by Executive Order 13751.

4.3.8 CULTURAL RESOURCES

Cultural resources laws place different responsibilities upon the Garrison with respect to each type of resource. Cultural resources can include historic buildings, sites, structures, and objects, historic districts, archaeological resources, sacred sites, archaeological collections and associated records, and cultural items.

Historic properties, as established by the NHPA, are any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion, in the NRHP (36 CFR 800.16(l)(1)).

Archeological resources, as defined by the ARPA, include “any material remains of past human life or activities which are of archaeological interest over 100 years old and found in an archaeological context on federal or Indian lands. Federal permits are required to excavate archaeological resources.”

Sacred sites are any specific, discrete, narrowly delineated location of federal land that is identified by an Indian tribe or tribal representative as sacred by virtue of its established religious significance to, or ceremonial use by, an Indian religion; provided that the federal agency was notified of its existence by a tribe or authoritative representative of an Indian religion (EO 13007). Executive Order 13007, *Indian Sacred Sites*, requires executive agencies with administrative responsibility of federal land management to accommodate access to and ceremonial use of Indian sacred sites and avoid adversely affecting the physical integrity of sacred sites. This EO does not apply directly to Native Hawaiian organizations, but the spirit of the EO should guide the Garrison in its management.

The NHPA authorizes the Secretary of Interior to promulgate regulations for the proper curation of archaeological collections created under NHPA, the Reservoir Salvage Act, the Antiquities Act, and ARPA (36 CFR §79). Collections and associated records include the curation of federally owned and administered archaeological collections, including collections of material remains such as artifacts, objects, specimens and other physical evidence, that are excavated or removed during a survey, excavation, or other study of a prehistoric or historic resource (36 CFR §79).

Cultural items as defined in 25 U.S.C. 3001 Section 3 (NAGPRA) include human remains, associated funerary objects, unassociated funerary objects, sacred objects, and items of cultural patrimony.

4.3.8.1 CULTURAL RESOURCES INVENTORY

USAG-HI

The following historic buildings, structures, districts, landmarks, archaeological sites, collections, and cultural items are managed by USAG-HI.

Āliamanu Military Reservation (AMR): A *heiau* and burial terrace known as “Salt Lake Heiau” or as “Pu’u Kapu Heiau” is the only known archaeological site at AMR. Subsequent archaeological surveys have discovered no other tangible archaeological sites (McAllister 1933; Takemoto and Joerger 1975; Kamakau 1964; as cited in ICRMP-USAH-HI 2017).

AMR has 119 buildings and structures that are 50+ years old that are in need of evaluation (RPLANS 2016). The underground tunnels and bunkers are also in need of evaluation within the context of other underground military structures.

Dillingham Military Reservation (DMR): Identified archaeological sites at DMR consist of abandoned concrete buildings, a manhole, a terrace complex, a *heiau* structure, and an agricultural complex (McAllister 1933; Takemoto and Joerger 1975; Rosendahl 1977; Moblo 1991; McGerty and Spear 2001; Kamakau 1964; Handy 1940; McGerty and Spear 1997; McGerty & Spear 2009; McGerty & O'Rourke 2010; as cited in ICRMP-USAH-HI 2017). Two sites determined to be eligible for listing include the Kawailoa *heiau* and the Kealia-Kawaihapai Complex. Thirteen sites are determined to be not eligible for listing, with the remaining 22 sites yet to be evaluated.

DMR has six buildings and structures over 50+ years old that are listed in the NRHP (RPLANS 2016).

Field Station Kunia (FSK): A 1998 reconnaissance survey by the Naval Facilities Engineering Command found no evidence of significant archaeological resources. Any potential sites would have been disturbed from previous construction and pineapple cultivation activities (Department of the Navy 1998, as cited in ICRMP-USAH-HI 2017).

FSK contains six buildings and structures that are over 50+ years old. Only one facility is determined eligible for listing (RPLANS 2016). Other FSK facilities were evaluated and determined to be not eligible for listing (U.S. Army Environmental Command 2013) (Department of the Navy 1998, as cited in ICRMP-USAH-HI 2017).

Fort DeRussy Military Reservation (FDR): Identified archaeological sites at FDR include royal fishponds, *‘auwai* (canal) complex, and burial sites (Elmore and Kennedy 2002; as cited in ICRMP-USAH-HI 2017). Of the known sites, one is determined eligible for listing, four sites are not eligible for listing, and nine sites have yet to be evaluated.

FDR contains three buildings and structures that are 50+ years old requiring evaluation (RPLANS 2016). Battery Randolph is individually listed on the NRHP, along with six other Batteries, as part of the Artillery District of Honolulu Multiple Property.

An Archaeological Collection Summary for Fort DeRussy, Hawai‘i was completed in 1996 (USACE 1996a). According to the report, an inadvertent discovery of human remains of six individuals was reported in 1976 during a construction project and the remains were reburied on Fort DeRussy (Davis 1992:18; Rosendahl 1977:1-24, 11-10; as cited in ICRMP-USAH-HI 2017). Human remains of two individuals were also discovered in 1991 and 1992 and left in situ. In 1993, during archaeological monitoring of subsurface utility excavations, between 39 and 52 individuals were discovered

(Carlson et al. 1995:29,40,42,45,4748; Davis 1992:18,44; Rosendahl 1977:1-24,11-10; Simons et al. 1995:48; as cited in ICRMP-USAH-HI 2017); 11 remains were left in situ, one was reinterred on site, and the rest were “exhumed and reinterred in a crypt on Fort DeRussy” (USACE 1996a).

Fort Shafter Military Reservation (FSMR): FSMR contains archaeological sites from both traditional Hawaiian context and the historic era. These include rock shelters, Hawaiian fishponds (now buried under fill), *heiau* structures, a pack trail, and several military sites (Tomonari-Tuggle and Slocumb 2000, as cited in ICRMP-USAH-HI 2017). Of these sites, one is determined not eligible, with 29 sites in need of evaluation.

FSMR has two historic districts and several prominent historic buildings and structures. One hundred thirteen of the buildings and structures have an active historic status (listed, eligible, or contributing to an eligible district), eight are determined not eligible, and 85 buildings are 50+ years old and in need of evaluation (RPLANS 2016).

An Archaeological Collection Summary for Fort Shafter, Hawai‘i was completed in 1996 (USACE 1996b). According to the report, the remains of one human skeleton was discovered at Fort Shafter in 1983 and released to the Bishop Museum. No objects are known to be associated with these human remains. The summary notes that “The military reservation (Fort Shafter) was a burial ground extending as far as Pohaha and up inland to the home of one of the sons of the Honorable S.M. Damon...” (Sterling and Summers 1978:327; Rosendahl 1977:1-49; as cited in ICRMP-USAH-HI 2017). The summary also notes the potential for disguised burial caves in steel rocky faces of the more inland portions of gulches at Fort Shafter. It was a common native Hawaiian internment practice to place remains in lava tubes, rock shelters, or niches in steep cliffs. These could be either individual or group burials (Kirch 1985:238; as cited in ICRMP-USAH-HI 2017)” (USACE 1996b). FSMR also has one reburial crypt where the Garrison reinterred human remains recovered from disturbed rock shelter sites within Fort Shafter.

Helemano Military Reservation (HMR): HMR was extensively developed during WWII and the postwar years, and subsequent archaeological surveys did not result in any identified sites (Rosendahl 1977; Fankhauser 1987; Cox and Zulick 2001; as cited in ICRMP-USAH-HI 2017).

HMR has one building considered eligible for the purposes of a Program Comment and six buildings over 50 years old in need of evaluation (RPLANS 2016).

Kahuku Training Area (KTA): Identified archaeological sites at KTA include cooking hearths, habitations, an agricultural complex, and an upland garden. Several archaeological sites are also of post-contact and military origin, including a historic house site, irrigation features, bunkers, and concrete slabs (Burke, de Leeuw, and Hammatt 2013, Monahan 2009, Descantes, Orr, and Desilets 2009, Ogg, Farrell, and Dega 2012, Hawkins, Toney, and Wasson 2014, Patolo, Farrell, and Dega 2010, McGerty and Spear 2004, Robins 2012; as cited in ICRMP-USAH-HI 2017). Of these sites, one Hanakoa Platform, is NRHP-listed, 24 are determined eligible, 35 sites are determined not eligible for listing, and the remaining 122 are yet to be evaluated.

KTA includes several buildings and structures that are associated with WWII and Cold War eras. In total, KTA includes 23 facilities over 50+ years old; 19 of which are contributing elements of an eligible historic district, and three of which are individually eligible for the NRHP (RPLANS 2016). One building has not yet been evaluated.

Kawailoa Training Area (KLOA): Identified archaeological sites include agricultural terraces, rock shelters, habitation complexes, enclosures, pondfield systems, burial areas, and hearths (Rosendahl 1977; Kirch and Sahlins 1992; Anderson 1998; Cox and Zulick 2001; as cited USAG-Hawai'i ICRMP 2017). Of the known sites, five are eligible, two are determined not eligible for listing, and the remaining 72 are yet to be evaluated.

There are no buildings or structures in the RPLANS real property database that are 50+ years old.

Kīpapa Ammunition Storage Site (KAS): There are five known historic-era archaeological sites at KAS, all of which are yet to be evaluated. There are no known prehistoric-era archaeological sites for either the upper or lower Kīpapa Gulch areas.

In total, KAS has 70 buildings and structures over 50 years old in the RPLANS real property database; 68 of these are ammunition storage or air raid/fallout shelter with active historic status (listed, eligible, or contributing to an eligible district). There are an additional 2 air raid/fallout shelters not yet evaluated.

The KAS is a regional ammunition storage facility, largely unused today with the exception of one magazine in the Lower Kīpapa group utilized by the National Oceanic and Atmospheric Administration (NOAA) as a tsunami and earthquake detection station (Pacific Cooperative Studies Unit 2010).

Mākua Military Reservation (MMR): Identified archaeological sites at MMR include *heiau* platforms, agricultural terraces, walls, enclosures, mounds, hearths (*imu*), habitation complexes, paths, and trails (Anderson 1998; Cox and Zulick 2001; Williams 2004; as cited USAG-Hawai'i ICRMP 2017)(Kay et al. 2013:133). Of the known sites, 33 were determined to be ineligible for listing. One site, Ukanipō *heiau*, is listed on the NRHP, 12 are determined eligible for listing, and the remaining 72 sites have yet to be evaluated.

MMR includes one structure over 50+ years old in need of evaluation (RPLANS 2016).

Mauna Kapu Communication Station Site (MKS): MKS contains no identified archaeological sites.

MKS has two buildings over 50+ years old in need of evaluation (RPLANS 2016).

Mokulē'ia Army Beach (MAB): MAB is largely undeveloped and there are no identified archaeological sites (Rosendahl 1977, as cited USAG-Hawai'i ICRMP 2017).

Pililā'au Army Recreation Center (PARC): Pililā'au Army Recreation Center (PARC) is located within Waianae-Kai Military Reservation (WMR). WMR is the official real property site name in which

the PARC is located. For archaeological purposes, WMR is considered a single site and has been assigned State Inventory of Historic Properties by the State of Hawai'i. The site is a highly significant pre-contact and post-contact Native Hawaiian cemetery. Excavations have yielded Native Hawaiian human remains in at least two different areas of the installation. A series of impressive petroglyphs carved into the rocks on the seaward side of the sea wall were exposed and documented in 2016.

The site contains five historic buildings that are 50+ years old (RPLANS 2016).

An Archaeological Collection Summary for Waianae Army Recreation Center, Hawai'i was completed in 1996 (USACE 1996c). According to the report, human remains of at least 33 individuals and thousands of associated funerary objects were recovered at the installation between 1984 and 1990, all of which were reportedly reinterred at the installation. Some were reinterred with their associated funerary objects, but some funerary objects may remain part of collections at other repositories.

Pūpūkea-Pa'ala'a-Uka Military Road (Drum Road): Twenty-three sites were identified in a 2002 survey conducted by Pacific Legacy, Inc. and are in need of an evaluation. Five are traditional Hawaiian in age, and the remaining sites consist largely of military-related development and use of the road. A single metal cross, presumably marking a grave, was also recorded (Whitehead, Cleghorn, and McIntosh 2005, as cited USAG-Hawai'i ICRMP 2017).

There are no buildings or structures that are 50+ years old.

Schofield Barracks Military Reservation (SBMR): As a whole, SBMR contains a total of 134 identified archaeological sites yet to be evaluated. The majority of identified sites are of Native Hawaiian origin and include heiau structures, agricultural terraces, 'auwai, mounds, enclosures, stone alignments, irrigation complexes, pondfields, and roads. SBMR also contains several historic era sites, including concrete foundations, tunnels/bunkers, and a reservoir.

Schofield Barracks Military Reservation as a whole, including cantonment, east (SBER), west (SBWR), and south ranges (SBSR), has 280 buildings and structures with an active historic status (listed, eligible, or contributing to an eligible district) and 5 are determined to be non-contributing elements or not eligible for listing. There are 172 buildings and structures over 50 years of age yet to be evaluated (RPLANS 2016).

Schofield Barracks Cantonment: Previous studies unanimously concluded that more than a century of intensive impacts by military land use, urban development, and commercial agriculture have substantially altered the cultural landscape of the central plateau's tablelands and thus, most, if not all, evidence of traditional cultural activity has been eliminated (Robins, Roberts, and Gilda 2007; Desilets et al. 2011; as cited USAG-Hawai'i ICRMP 2017) (Tetra Tech 2015). There are 10 sites in the cantonment that have yet to be evaluated (Belt Collins 2000a; Roberts, Robins, and Buffum 2004; as cited USAG-Hawai'i ICRMP 2017).

Schofield Barracks East Range (SBER): SBER has 13 known archaeological sites yet to be evaluated, including a terrace with aligned stones, a pecked boulder, and the O‘ahu *nui* stone; as well as historic-era sites, including concrete foundations, a tunnel/bunker, and reservoir (Robins and Spear 1997; as cited USAG-Hawai‘i ICRMP 2017).

Schofield Barracks South Range (SBSR): The majority of identified archaeological sites at SBSR are of Native Hawaiian origin and include agricultural terraces, ‘*auwai*, mounds, enclosures, stone alignments, irrigation complexes, pondfields, and roads (Robins and Spear 1997; Anderson 1998; Kaschko et al. 2011; as cited USAG-Hawai‘i ICRMP 2017) (USAEC 2008). Sixty-two sites are in need of evaluation.

Schofield Barracks West Range (SBWR): Most of the known archaeological sites at SBWR and the Battle Area Complex are of Native Hawaiian origin and include *heiau* structures, agricultural terraces, ‘*auwai*, fishponds, enclosures, stone alignments and roads (Anderson 1998; Buffum and Peterson 2005; Buffum, Robins, González; and Peterson 2005; DeBaker and Peterson 2009; Robins and Spear 1997; Sims and Hawkins 2014; Kaschko and Tome 2011; Winburn, Byerly, and Mark 2013; as cited USAG-Hawai‘i ICRMP 2017) (USAEC 2008). Forty-nine sites are in need of evaluation.

Signal Cable Trunking System: There are no known archaeological sites on Signal Cable Trunking System lands.

The Signal Cable Trunking System includes 6 communications centers that were preexisting at the time of construction: 30 centers constructed in 1941, and 6 centers added during the Cold War between 1956 and 1989, all of which are yet to be evaluated. The system also includes 17 cable vaults built in 1941 and more than 1,100 miles of cable, all of which still need to be evaluated (RPLANS, 2016)

Tripler Army Medical Center (TAMC): A relatively large portion of TAMC has received archaeological survey coverage. Known archaeological resources include a temporary shelter, an agricultural terrace, and possibly a *heiau* and are in need of evaluation (Rosendahl 1977; Hammatt and Chiogioji 1994; Zulick and Cox 2000; as cited USAG-Hawai‘i ICRMP 2017).

TAMC contains 42 buildings and structures that are 50+ years old. Twenty-five facilities are reported as contributing elements of an eligible Historic District, four facilities reported as non-contributing, and thirteen buildings and structures over 50 years old yet to be evaluated. The family housing under management by Island Palm Communities, LLC are not eligible according to the Programmatic Agreement for the Residential Communities Initiative (RPLANS 2016).

Waikakalaua Ammunition Storage Tunnels (WAST): No archaeological sites are documented for the Waikakalaua Ammo Storage Tunnels site.

The storage site originally supported 52 WWII-era tunnels built into the canyon walls of the Waikakalaua Gulch; 49 of these air raid/fallout shelters remain, 48 of which have an active historic

status (listed, eligible, or contributing to an eligible district), and 1 of which is not yet evaluated (USAEC 2013, RPLANS 2016).

Wheeler Army Airfield (WAAF): A majority of the identified archaeological sites at WAAF are affiliated with the historic era. Eleven sites are in need of evaluation. Potentially eligible sites include the O’ahu Rail and Land Company (OR&L Co.) rail line trestle and the Maunauna Site in the southwestern bluff of Wai’eli Gulch (Rosendahl 1977; Belt Collins 2000b,a; Buffum et al. 2004; as cited USAG-Hawai’i ICRMP 2017). Subsequent surveys found no evidence of traditional Hawaiian or early historic cultural resources.

WAA contains 294 buildings and structures over 50 years old. Two hundred and seven of the buildings and structures have an active historic status (listed, eligible, or contributing to an eligible district), 7 were determined to be noncontributing elements of a historic district, and 80 are yet to be evaluated (RPLANS 2016).

USAG-Pōhakuloa

The following historic buildings, structures, districts, archaeological sites, collections, and cultural items are managed by USAG-Pōhakuloa.

Kawaihae Military Reservation: Kawaihae Military Reservation consists of landfill area; therefore, archaeological sites are not anticipated. In 2001, these findings were confirmed by archaeologists, Cox and Zulick, who asserted that no archaeological remains were located within Kawaihae Military Reservation bounds (Rosendahl 1977; Cox and Zulick 2001; as cited USAG- Pōhakuloa ICRMP 2017).

Most structures on Kawaihae Military Reservation were built between 1959-1985 and consist of wharves, sea walls, offshore moors, and a dock/ramp (Cox and Zulick 2001). Six buildings and structures require evaluation to determine NRHP eligibility.

Kīlauea Military Camp (KMC): No subsurface cultural deposits have been located on KMC. Clearance surveys for the Hawai’i Volcanoes National Park identified five isolated historic period remains (including a stone walkway, an earth mound, a stone path, an L-shaped stone foundation, and a disturbed cement foundation); none were determined to be eligible for listing (Tomonari-Tuggle and Slocumb 2000).

Kīlauea Military Camp (KMC) is a Historic District determined eligible for listing on the NRHP for its association with the development of a recreation camp for U.S. military personnel on the Island of Hawai’i. According to National Park Service records, the Hawai’i SHPD concurred with the National Park Service’s determination that Kīlauea Military Camp is eligible for listing on the NRHP in 1996 (National Park Service 2006). The camp is also considered locally significant for its Plantation-style architecture using local materials and adaptation of National Park Service rustic and naturalistic design. According to a 2017 letter from the Superintendent at Hawai’i Volcanoes National Park, there are 103 contributing elements and 42 non-contributing elements within the eligible Historic District,

with two remaining buildings and structures yet to be evaluated (Orlando 2017, as cited USAG-Pōhakuloa ICRMP 2017).³

Pōhakuloa Training Area (PTA): To date, approximately 20% of the impact area and 50% of the area outside the PTA High Hazard Impact Area have been surveyed for cultural resources. Surveys inside of the impact area are conducted as areas are reclaimed for ranges and other training infrastructure. The remaining unsurveyed areas outside of the impact area are primarily in remote areas that are not used for training.

As of Sept. 30, 2016, PTA contains 1,198 known archaeological sites. Thirty-nine sites have been determined eligible for the NRHP. Of the eligible sites, 5 are related to 19th and 20th century contexts, 32 are Traditional Hawaiian sites, 1 is protohistoric, and the period of significance for the one remaining site is not yet identified. Known archaeological sites at PTA represent a diverse range of Native Hawaiian site types, including caves, enclosures, lithic scatters, C-shaped shelters, shrines, platforms, and trails (USAG ICRMP-Pōhakuloa 2017). One site, the Bobcat Trail Habitation Cave, is listed on the National Register, 326 sites have been determined not eligible, and 822 are unevaluated. Of the unevaluated sites, 89 are 19th or 20th century sites, 364 are traditional Hawaiian sites, two span the traditional Hawaiian and historic era contexts, two are recent, and a period of significance has not been identified for 365.

No archaeological sites have been identified in the PTA cantonment or at Bradshaw Army Airfield. Portions of both areas have been surveyed, and subsurface monitoring in both areas has failed to identify any stratified archaeological deposits.

To date, no historic buildings at PTA are determined eligible for the NRHP. Most of the buildings on PTA are Quonset huts dating from 1955-1958. In 2006, the ACHP published a Program Comment for the Department of Defense regarding Cold War Era Unaccompanied Personnel Housing (UPH), and the Army in turn published a historic context on *Unaccompanied Personnel Housing (UPH) During the Cold War (1946-1989)* as mitigation for any adverse effects to properties identified under the ACHP Program Comment. Seventy-eight of the buildings at PTA and one building at Bradshaw Army Airfield are considered Cold War-era UPH in accordance with ACHP Program Comment and thus are not subject to further NHPA consultation or mitigation. A consultation is underway with the SHPD for the remaining buildings.

An Archaeological Collection Summary for PTA was completed in 1996 (USACE 1996). USAG-Pōhakuloa identified and repatriated those human remains and cultural items that were within the Garrison's collections described in the 1996 summary. In some cases, human remains, or *iwi kupuna*, were re-interred as an appropriate disposition, in compliance with NAGPRA, and are of high cultural

³ Note: NPS claims 103 contributing resources, 42 non-contributing, and 2 "undetermined" within the KMC district. These numbers do not match Army real property records that show 79 contributing or eligible, 42 non-contributing, and 2 yet to be evaluated.

and traditional religious value. Therefore, locational information is restricted in accordance with the commitments made during consultation for those actions.

4.3.8.2 SACRED SITES

As of June 2017, no sacred sites have been designated at any of the Army installations managed by USAG-HI and USAG-Pōhakuloa.

4.3.8.3 IMPACTS TO CULTURAL RESOURCES

Undertakings that could pose impacts to cultural resources generally involve alterations to a property or the surrounding area, with the most potential for adverse impacts on training lands. Facilities development and improvements, underground and aboveground utilities construction, landscaping and vegetation removal, military training activities, vandalism and looting, and unauthorized excavation of archaeological sites are all potential sources of adverse impacts to cultural resources. For this analysis, an impact will be considered adverse if the impact is significant enough to damage a site's integrity, destroy the research potential of the resource, or prohibit its eligibility for the State Inventory of Historic Properties or the NRHP.

4.3.8.4 PROPOSED ACTION

ICRMP implementation will have a beneficial effect on cultural resources. The goals of both ICRMPs are to consolidate requirements for compliance with NHPA, NEPA, NAGPRA, ARPA and other legal requirements consistent with DoD standards while minimizing effects on the military mission. The ICRMPs provide streamlined direction for routine activities that may have an impact on cultural resources by establishing SOPs, identifying various public consultation requirements, and providing goals that would benefit the management of cultural resources on Garrison lands. As a result of implementation, USAG-HI and USAG-Pōhakuloa will have a concise and well-defined management plan to guide cultural resources identification and management over the next five-year funding cycle (FY2017-FY2021).

4.3.8.5 NO ACTION ALTERNATIVE

Existing management for cultural resources under the No Action Alternative would remain the same. The Cultural Resources Sections comply with applicable legal requirements, actively coordinate their activities with other Garrison management units, and provide education to reduce risk of negative impacts to cultural resources.

4.3.9 AESTHETIC AND VISUAL RESOURCES

Aesthetic and visual resources are defined by the Army as the “components of the environment as perceived through the visual sense only. Aesthetic specifically refers to beauty in both form and appearance” (U.S. Army 2006). Aesthetic and visual resources can include landforms, vegetation, water surfaces, and cultural modifications (physical changes caused by humans) (Lawrence 2007).

Cultural landscapes as defined by National Park Service *Preservation Brief 36: Protecting Cultural Landscapes*, and USACERL *Guidelines for Documenting and Evaluating Historic Military Landscapes* “is a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person exhibiting other cultural or aesthetic values” (Birnbaum 1994).

There are numerous aesthetic and visual resources on Garrison-managed lands. Aesthetic and visual resource types include historic sites, historic designed landscapes, historic vernacular landscapes, and ethnographic landscapes.

An impact to an aesthetic and visual resource can be defined as the degree of change in visual resources and viewer response to those resources caused by an action or project.

4.3.9.1 PROPOSED ACTION

ICRMP implementation will have no effect on aesthetic or visual resources. There are no projects or actions under the Proposed Action that would negatively impact aesthetic and visual resources within and around lands managed by USAG-HI or USAG-Pōhakuloa.

4.3.9.2 NO ACTION ALTERNATIVE

The No Action Alternative would maintain existing conditions and existing cultural resources management practices with respect to visual and aesthetic resources.

4.4 Socioeconomics, Protection of Children and Private Property, Environmental Justice

Executive Order 13045, *Protection of Children from Environmental Health Risks and Safety Risks*, protects children from disproportionately incurring environmental health or safety risks that may arise from federal actions. Health and safety risks to children can be attributed to products or substances that the child is likely to come in contact with or ingest (such as the air we breathe, the food we eat, the water we drink or use for recreation, the soil we live on, and the products we use or are exposed to) (EO 13045).

Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, requires federal actions to address environmental justice in minority and low-income populations. Environmental justice analyses are performed to identify potentially disproportionately high and adverse impacts to these target populations and to identify alternatives that might mitigate these impacts.

No racial or ethnic group constitutes a majority in Hawai‘i. The State of Hawai‘i estimates that in 2015 the population of Hawai‘i was 1,431,603 people (Hawai‘i. Census 2017). Asians make up 37.3%, Caucasians 26.7%, Native Hawaiians and other Pacific Islanders constitute 9.9%, Hispanics 10.4%,

and multi-racial groups make up 23% of the population (Hawai'i. Census 2017). Median household income is \$69,515 with 10.6% of the population living in poverty (Hawai'i. Census 2017).

This analysis considers the region of influence from federal actions to be located solely within the boundaries of USAG-HI and USAG-Pōhakuloa controlled lands. Both ICRMPs provide management direction and guidance for only the cultural resources that are within the installation boundaries.

During the development of the ICRMPs, Native Hawaiian organizations and groups that were traditionally associated and/or culturally affiliated with each geographic area were contacted to determine if any of the facilities possessed traditional cultural properties of significance to these groups. No traditional cultural properties were identified.

4.4.1.1 PROPOSED ACTION

Implementing both ICRMPs would not result in adverse effects to air quality, water bodies, nor would any hazardous or toxic materials or wastes be released. Therefore, the Proposed Action would not result in environmental or safety risks that would disproportionately affect children, minority, or low income populations. Implementing both ICRMPs provides a beneficial effect by streamlining the consultation process for individuals and groups that might be affected by USAG-HI and USAG-Pōhakuloa actions.

4.4.1.2 NO ACTION ALTERNATIVE

The No Action Alternative would maintain existing practices and abide by existing legal requirements for consulting with Native Hawaiian populations and other minority groups who may be disproportionately affected by actions on Garrison lands.

4.5 Cumulative Effects

The most devastating environmental effects may result, not from the direct effects of a particular action such as implementation of a management plan, but from the combination of individually minor effects of multiple actions over time (NEPA 2017). Baseline environmental conditions provide the context for evaluating impacts and includes all potentially affected resources, ecosystems, and human communities (NEPA 2017).

Implementing the Proposed Action will not contribute to cumulative effects. It will, however, mark the first version of ICRMPs in place at all of the 22 sub-installations directly managed by USAG-HI and USAG-Pōhakuloa. The ICRMPs are guiding documents without site-specific actions; they complement and inform other management plans such as real property master plans, range complex management plans, or natural resource management plans. Due to the nature of the ICRMP as a management and guiding document without any site-specific actions, there is little opportunity to add to the cumulative effects of installation planning.

4.6 Irreversible and Irretrievable Commitment of Resources

An analysis of irreversible and irretrievable commitment of resources is required as part of the NEPA environmental review process. Irreversible and irretrievable commitment of resources refers to the use of non-renewable resources and the effects that their use will have on future generations (42 USC § 4331 Sec. 101 (v)). Irreversible effects may result from the use or destruction of a specific resource, such as fuel, which cannot be replaced within a reasonable time frame. Irretrievable impacts could result from the loss in value of a resource that can no longer be restored as a result of an action.

ICRMP implementation may require negligible commitments of non-renewable resources such as fuel for vehicle use.

CHAPTER 5 CONCLUSION

Table 5-1: Summary of Environmental, Social, and Economic Impacts

Resource Area	Proposed Action	No Action Alternative
Mission, Location, and Land Use	Beneficial Impact: The ICRMPs provide comprehensive guidance for events in which land use and training exercises have the potential to adversely affect cultural resources. Improved coordination can reduce the risk of interruptions to the mission.	Adverse Impact: Increased risk for inadvertent discoveries and/or damage to cultural resources during training exercises that could lead to interruptions in the mission. Mission interruptions could result in a lack of troop readiness.
Air Quality	Negligible Impact: Possible effect from release of fugitive dust during surveys and maintenance that occur with or without an ICRMP. Fugitive dust release would not foreseeably result in adverse effects to human health, nor cause any installation to be classified as “non-attainment.”	Negligible Impact: Air quality designation would remain unchanged, in attainment. Ongoing survey and maintenance activities might result in negligible short-term negative effects from fugitive dust, but would not result in adverse effects to human health.
Soils	Negligible Impact: ICRMP implementation would not result in soil degradation or loss of soil structure. Archaeological surveys and routine maintenance could result in small-scale disturbances to soil, but effects would be negligible and easily remediated if necessary.	Negligible Impact: Soil resources will remain unchanged from current conditions. The potential for small scale disturbances exists during survey and maintenance activities.
Water Resources	Beneficial Impact: Improved coordination and reliance on standardized GIS data will allow the Cultural Resources Sections to identify the location of water resources, including intermittent streams, and will ensure that measures are taken to avoid adverse effects to water resources.	No Impact: Existing coordination to reduce risk of negative impacts to water resources would continue.

Resource Area	Proposed Action	No Action Alternative
Native Ecosystems and Biological Diversity	Beneficial Impact: Improved coordination and reliance on standardized GIS data will allow the Cultural Resources Sections to identify the location of sensitive ecosystems and resources and will ensure that measures are taken to avoid adverse effects to native ecosystems and biological diversity. Improved coordination provides the Natural Resources Program an opportunity to advise on best management practices to avoid negative impacts to these sensitive resources.	No Impact: Existing coordination to reduce risk of negative impacts to native ecosystems and biological diversity would continue.
Threatened and Endangered Species	Beneficial Impact: Improved coordination for identifying areas where threatened and endangered species exist and could be directly or indirectly affected by a project or activity will further protect sensitive species.	No Impact: Existing coordination procedures would continue to reduce risk of negative impacts to threatened and endangered species.
Invasive Species	Beneficial Impact: Improved coordination will allow the Natural Resources Program to identify weedy species in action area, advise on how to reduce potential spread, monitor for infestations, and implement control/eradication measures in the event an invasion occurs.	No Impact: Existing coordination procedures would continue to reduce risk of the accidental invasion and spread of invasive species.
Cultural Resources	Beneficial Impact: The ICRMPs provide comprehensive and efficient management guidance for routine activities that could negatively impact cultural resources, establishes SOPs, and provides goals to benefit the management of cultural resources.	No Impact: Existing management would remain the same. The Cultural Resources Sections comply with applicable legal requirements, actively coordinate their activities with other Garrison management units, and provide education to reduce risk of negative impacts to cultural resources.

Resource Area	Proposed Action	No Action Alternative
Aesthetic and Visual Resources	No Impact: There are no projects or actions under the Proposed Action that would negatively impact aesthetic and visual resources.	No Impact: The No Action Alternative would maintain existing conditions and existing cultural resource management practices with respect to visual and aesthetic resources.
Socioeconomics, Protection of Children and Private Property, and Environmental Justice	No Impact: ICRMP implementation would not result in adverse effects to air quality, water bodies nor would any hazardous or toxic materials or wastes be released that could disproportionately affect children, native populations, and/or minority groups.	No Impact: Current conditions would remain unchanged. Existing management practices and legal requirements require that consultations are held for Native Hawaiian populations and other minority groups who may be disproportionately affected by actions on Garrison lands.

5.1 Conclusion

The legal requirements of DoDI 4715.6 and AR-200-1 mandate that each Army installation develop and implement an ICRMP for use as a planning tool and as the guiding document for cultural resources management decisions. The ICRMPs articulate management procedures and long-range goals for cultural resources on USAG-HI and USAG-Pōhakuloa controlled lands.

Based upon the analysis conducted in this EA, adoption and implementation of both ICRMPs, as written, would not constitute a major federal action significantly affecting the equality of the human environment. An issue of a Finding of No Significant Impact (FNSI) would be appropriate. The preparation of an Environmental Impact Statement (EIS) will not be required before proceeding with implementation of the Proposed Action.

CHAPTER 6 CONSULTATION AND COORDINATION

6.1 Agency Consultation and Coordination

United States Army Garrison, Hawai'i

Graham, Lisa

NEPA Program Manager, Environmental Division

Davis, Richard

Cultural Resource Manager, Environmental Division

United States Army Garrison, Pōhakuloa

Taomia, Julie

Cultural Resources Manager, Environmental Division.

6.2 Public Involvement

An announcement will be made available in the following local papers near USAG-HI and USAG-Pōhakuloa sub-installations to inform the public that both ICRMPs and the EA and draft FNSI are available for public review at nine library locations and on the official USAG-HI website

<https://www.garrison.hawaii.army.mil/NEPA/NEPA.htm>

Newspaper announcement location:

- Honolulu Star-Advertiser
- Hawai'i Tribune Herald
- West Hawai'i Today

Printed copies are made available at the following locations:

- Island of O'ahu library locations
 - Honolulu Library
 - Waianae
 - Waialua Library
 - Mililani Library
 - Wahiawā Library
- Island of Hawai'i library locations
 - Hilo Library
 - Kona Library
 - Waimea Library

Copies of the ICRMPs and the EA and draft FNSI will be dispersed on a CD to the following organizations:

- State Historic Preservation Division
- Hawai'i State Office of Hawaiian Affairs

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32 CFR §651. Environmental Analysis of Army Actions.

36 CFR §61. Secretary of the Interior Professional Qualification Standards.

36 CFR §79. Curation of Federally-Owned and Administered Archaeological Collections.

36 CFR §800. Advisory Council on Historic Preservation.

40 CFR §1500-1508. Protection of Environment.

43 CFR §10. Native American Graves Protection and Repatriation Regulations.

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