



DEPARTMENT OF THE ARMY
U.S. ARMY INSTALLATION MANAGEMENT COMMAND-PACIFIC
HEADQUARTERS, UNITED STATES ARMY GARRISON, POHAKULOA TRAINING AREA
P. O. BOX 4607
HILO, HAWAII 96720-0607

SUBJECT: Response to ACHP Review of National Historic Preservation Act Section 106 Consultation for Ke'āmuku Maneuver Area Grazing Lease No. 2, Pōhakuloa Training Area, Hawai'i Island, Hawai'i; Agency decision to affirm initial finding.

Mr. Christopher Koepfel
Acting Director of the Office of Federal Agency Programs
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, District of Columbia 20001

Dear Mr. Koepfel,

Thank you for providing the Council's opinion, recommendations, and guidance in response to the request for comments regarding the U.S. Army Garrison, Pohakuloa Training Area (USAG-P) finding of 'no historic properties affected' and the Hawaii State Historic Preservation Division's (SHPD) subsequent objection for a proposed undertaking to establish a second agricultural grazing lease in the Ke'āmuku Maneuver Area (KMA) of PTA on Hawai'i Island, Hawai'i.

The USAG-P received the letter from the Advisory Council on Historic Preservation (ACHP) by email on September 22, 2023. Thank you for the declaration that, in this instance, the USAG-P appropriately applied the criteria for determining the adverse effects of this undertaking.

The additional recommendations and guidance in the letter are thoughtful and helpful, and the Council's comprehensive input is appreciated. The USAG-P has taken all of the Council's comments into consideration in reaching a decision to affirm the initial finding of no adverse effect and allow the undertaking to proceed as described.

In addition, to address on-going concerns and to facilitate better communications for future undertakings, the USAG-P intends to routinely dialogue with the SHPD, the SHPD staff, and other consulting parties; this includes waiting until the following business day to send correspondence. The USAG-P also intends to discuss the appropriate use of the expedited process under 36 CFR § 800.3(g) with the SHPD.

Regarding ACHP's recommendation that the USAG-P, in consultation with SHPD, consider how grazing leases fit into the training area management actions covered by the *Programmatic Agreement Among the U.S Army Garrison Hawaii, the Hawaii State Historic Preservation officer, and the Advisory Council on Historic Preservation Regarding Routine Military Training Actions and Related Activities United State Army Installations on the Island of Hawaii* (Training PA), the USAG-P does not intend to consider how grazing leases fit into the Training PA. The Training PA is solely for routine training activities, and we feel grazing leases do not fit these parameters.

Per 36 CFR § 800.4(d)(iv)(C), this summary of the final decision will be distributed to all consulting parties listed in the enclosure. Thank you again for your thoughtful response and the recommendations for improving the management of historic properties at the USAG-P.

If you have any questions or require clarification, please contact Dr. Heidi Miller, USAG-HI PTA Archaeologist, at 808-787-7802 or via email at heidi.e.miller10.civ@army.mil.

Sincerely,

Timothy L. Alvarado
LTC, SF
Commanding

Enclosures

Enclosure 1: Consulting Parties List