ARMY TRAINING LAND RETENTION OF STATE LANDS AT KAHUKU TRAINING AREA, KAWAILOA-POAMOHO TRAINING AREA, AND MAKUA MILITARY RESERVATION ISLAND OF O‘AHU

DRAFT ENVIRONMENTAL IMPACT STATEMENT

VOLUME III: APPENDICES E-I PART II



U.S. ARMY

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

PREPARED BY U.S. ARMY CORPS OF ENGINEERS, HONOLULU DISTRICT
UNDER CONTRACT W9128A-19-D-0008

APRIL 2024

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

NOTE ABOUT USE OF HAWAIIAN DIACRITICAL MARKINGS:

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

Maud Lawrence

Dear military representives
I beg you to accept responsibility and, at the very least, pay your fair share for the use of our lands. I live on Hawai'i island and have seen the extreme negative impacts to our ecosystem which your presence has brought. Soil erosion, introduction of non-native species, destruction of native plant species, destruction of habitat for native fauna and destruction and desecration of areas of archeological significance have been a few of the consequences of military maneuvers at Pohakuloa Training Area and elsewhere on the island.
Hawai'i has long been held in thrall of the military, but at what cost? It is past time for you to act as a partner and not the aggressor. We stand for this no more. Hear our voices. Heed our words.
Aloha ~ Maud L.

Ara Laylo

I would like to submit the follow comments regarding the Army's upcoming Environmental Impact Statement, which proposes to retain up to 6,300 acres of land on Oʻahu for military training purposes. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawaiʻi, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawaiʻi has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawaiʻi courts have also acknowledged the state's constitutional duty to mālama ʻāina. The leasing of ʻāina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ʻāina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on Oʻahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a "no action alternative" as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Waiʻanae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ʻāina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the "fair treatment of all people". Fair treatment means "no group of people should bear a disproportionate share of the negative environmental consequences". The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ʻāina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawaiʻi: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawaiʻi residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities. These military training lands are situated in communities that are majority

working-class, people of color, and Native Hawaiian. Kahuku, Waiʻanae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities. Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Waiʻanae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands. In the Ching vs. Case ruling, the court found the state to have a trust duty to "mālama ʻāina" and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using. These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through moʻolelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access. Environmental justice (EJ) as defined by the EPA requires "meaningful involvement" of impacted communities such that "decision makers will seek out and facilitate the involvement of those potentially affected." Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku.

Gabi Le

GIVE BACK THE LAND

Oriana Leao

Aloha e Department of the Army,
Please find attached Oahu ATLR EIS Comments written and submitted in my individual/personal capacity. Please contact me if you have any questions or any difficulty retrieving the attached PDF. Mahalo for your time and consideration.

Mahalo,
Oriana Leao[redacted]

August 31, 2021

Oahu ATLR EIS Comments
P.O. Box 3444
Honolulu, HI
96801-3444

Subject: **Oahu ATLR EIS Comments**

Aloha e Department of the Army (DOD),

The following Comments shall be recorded in regards to the Environmental Impact Statement concerning the Proposal to re-lease lands on the island of O'ahu-a-Lua including the Poamoho Training Area, the Kahuku Training Area, and the Makua Military Reservation for 65 years, with the state of Hawai'i charging one dollar ($1.00) for each parcel.

- The current proposed action does not involve "resource management activities." Pursuant to HEPA requirements noted in HRS 343-2 and HRS 343-5(a), the final EIS should note how the Army will negotiate with the state to determine a fair market value for the approximate 6,300 acres currently leased to the Army and how the Army will require the state to use said funds for non-profit environmental resource management organizations and programs that serve Native Hawaiians.

- Exercise "Minimum Retention and Access" and retain the minimum amount of state-owned lands within each training area that is required for USARHAW to continue to meet its current ongoing training requirements. In the final EIS, provide comparative data regarding alternative training sites on the U.S. continent at Army bases such as Fort Lewis, Washington.

- In 2009, the Army identified over 100 different cultural sites on the 4,200-acre property of Makua Valley including temples, altars, burial sites, and petroglyphs. The Army also determined that the valley was home to about 50 occurring or potentially occurring endangered plant and animal species.

  Beyond the use of permits and lease authorization from state agencies, the final EIS should describe the means and process by which the military intends to ensure that all opportunities to prevent and mitigate damage to previously identified and newly identified cultural sites will be explored, executed, and evaluated at the noted training areas (HEPA – HRS 343-2).

- The final EIS should describe the standard operating procedure the Army intends to utilize to address or mitigate any past, current, and projected environmental impacts of explosive and un-explosive ordinances at the noted training areas.

- The final EIS should describe how the military will comply with all FAA requirements for all aircraft training as well as the use of all manned and un-manned aerial systems within proximity of residential areas and birdlife.

- The current proposed action does not involve new construction activities. The final EIS should define the term "construction activities" and describe how the proposed action of "no new construction activities" will be enforced regarding any proposals for Missile Defense Radar Systems or Sensors, fox holes and townscapes for maneuver training activities, and all other construction activities at the noted training areas.

- Pursuant to Article 12, Section 7 of the Hawaii State Constitution, the final EIS should describe how access to cultural sites will be secured and available for cultural activities which include but are not limited to ceremonial activities in recognition of Makahiki Season.

- Pursuant to 40 CFR 1502.9 (c) and HAR 11-200-26, the final EIS should note the potential of a supplemental EIS as needed.

Mahalo for your time and consideration.

me ka haʻahaʻa (with humility),

Oriana Leao

Oriana Leao

Tom Lechanko

Thank you for today. I just wanted to give one rendition. (Speaking Hawaiian.) A critical note since time immemorial, time eternal ... We embrace those we choose to follow ... Places of exact and concise supernatural energy.
Hawaiian traditional culture property remains for all times, despite the unauthorized removal of its (indiscernible), physical features and structures. We require to be within their realm to acknowledge and verify the unseen and seen perpetual existence.
Mahalo, Colonel Misigoy, Trisha, and all that participated tonight. God bless you all. Mahalo nui. Malama.

Caitlin Lee

The US Army shouldn't be allowed to renew it's "lease" with Hawaii. For the past 65 years, they have been an unwelcome presence for the native populations on the islands. They have negatively impacted the environment through land destruction for military facilities, desecration of sacred lands, countless military tests, and other such things. All throughout that they have only given Hawaii $1 for this access. I mean, honestly, how can that even be considered a lease? That's essentially colonialism and robbery. It is time to give the land back to people and let them heal what has been broken.

Maelani Lee

To the ARMY and Affiliates,
I, Queen of Hawaii, oppose any and all Army training and operations in Hawaii (all islands). Refrain from doing so, do not perform any EIS on any land in Hawaii. I do not approve and do not authorize any exercise, training, live training or storing of any weapons here in Hawaii. It is now, that this notice is officially warranted, by all military on Oahu and the whole archipelago of Hawaii.
Regards,Queen Maelani Lee

Ona G. Lee

To Whom It May Concern, I am writing you in regards to the leases at Kahuku, Pohakuloa, Poamoho and Makua in the State of Hawaii. These mliltary leases must end in 2029. Militarism means toxic contamination for generations, desecrating the land, and disrespecting the indigenous culture. Militarism only perpetuates poverty and misery. I do not subscribe to the U.S. military version of security and protection, which is really an agenda of endless war and corporate extraction. The fight for genuine freedom and democracy must mean that land, water, and traditional foodways are accessible, especially to indigenous people who have stewarded these lands for centuries. If we listen to indigenous land protectors, we can build a brilliant future, but that means putting common sense at the forefront. We want the military out of these islands so we can build a green economy based on genuine security, survival and peace. Sincerely,Ona G. Lee

Melissa Lefkowitz

My indigenous colleague and his community need and want their ancestral land back.

Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good.

These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts.

The EIS process currently considers a “no action alternative” as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored.

Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the “fair treatment of all people”. Fair treatment means “no group of people should bear a disproportionate share of the negative environmental consequences”. The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world.

These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. In 1997, the CEQ produced a guide titled “Considering Cumulative Effects Under the National Environmental Policy Act” which provides a framework for advancing environmental impact analysis by addressing cumulative effects in either an environmental assessment (EA) or an environmental impact statement. The EIS should employ

this framework in order to address the cumulative effects of all related military activities, not just the proposed project.

US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities.

These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai‘anae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities.

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In the Ching vs. Case ruling, the court found the state to have a trust duty to “mālama ‘āina” and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using.

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Environmental justice (EJ) as defined by the EPA requires “meaningful involvement” of impacted communities such that “decision makers will seek out and facilitate the involvement of those potentially affected.” Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku.

Roberts Leinau

August 3, 2021To whom it may concern, My comments below are in reference to the Army's plans to retain leased state-owned land on Oahu for military training. Drum Road, which connects Schofield Barracks to Kahuku Training Area, is as important now as it was when it was built. Prior to its construction in the 1930's, there was only Kamehameha Hwy and the old train track which ran parallel. Coastal Defenses felt there was a need for an alternate route to get around the island in the advent of Kamehameha Hwy becoming impassable. Today, Kamehameha Hwy is the only way to get from Schofield to the Kahuku Training Area unless you fly in via helicopter… or are prepared to take many risks associated with driving on Drum Road. It is a one-way road with no guard railings adjacent to steep drop-offs. Both the surface and the sub-base course, which is missing in many steep areas, are VERY dangerously slippery when it has been raining and clay is involved. Yet, the road is often referred to at public meetings as a possible alternate emergency escape route even though it is not safe to be used in its current condition. The last time it was significantly improved was 13 years ago, around 2008 for the Stryker Brigade. Drum Road passes through several properties with a perpetual easement and has been under Schofield's Range Control for many years. Other parties who have access keys are: fire departments (both military and city) to fight fires and respond to rescue incidents, DLNR/DOFAW, DLNR/DOCARE, USGS, hunters, biologists and property owners accessing their mauka land. Thus, I propose the Army include the fixing of Drum Road in its plan to retain Kahuku Training Area, making this a priority. Drum Road could once again be used as a functional one-way road for military transport. Equally if not more important, making Drum Road safe and passable will benefit civilian operations which currently use the road AND serve as a viable emergency route should it be needed in the future. The Army could stress this as a positive impact to the local community. Sincerely, Roberts Leinau [redacted]

Roberts Leinau

There was mention that this round of lease considerations would include community concerns. Prior to the construction of Drum Road [in the 1930's] which connects Scofield Barracks to Kahuku [KTA] there was only the costal Kamehameha Hwy. and the parallel train track. The Costal Defenses felt that there was a need for some redundancy to get around the Island in the advent of Kamehameha Hwy becoming impassable.
Today there is still only Kamehameha Hwy to get from Schofield to the Kahuku training area [unless you are in one of the many helicopters that frequent this area] ... unless, you are prepared to take many risks associated with traveling on Drum Road.
The last time Drum Road got some meaningful improvements it was when the Stryker Brigade was selected to be stationed at Schofield in around 2008.
Drum Road passes through several properties with a perpetual easement and has been under the control of Schofield's Range Patrol for many years, which coordinates with military training maneuvers. Other parties who have appropriate access keys are: the fire departments [both military and City] .... both to fight fires and to respond to rescue incidents, DLNR/DOFAW, DLNR/DOCARE, USGS, hunters, biologists, property owners accessing their mauka land, etc.
The road is often referred to at public meetings as a possible alternate emergency escape route although it is not often safe enough to be used in that capacity at this time. Drum Road is a one-way road with no guard railings adjacent to steep drop-offs. Both the surface and the sub-base course which is missing in many steep areas and is VERY dangerously slippery when it has been raining and clay is involved.
Drum Road is as important now as it was when it was constructed. It has been an important functional one-way road before and should be fixed again, especially if the military intends to utilize it in the future as a connector of one military property to another. Plus, it will be a major safety benefit to many who currently use the road &/or may need to use it in the future and have safety concerns.

Lisa Lemke

Give Hawaiians their land back. Time for the military to move elsewhere. Do not renew their lease.

Nicole Leonard

I OPPOSE military occupation in Hawaii. The permits for the military should NOT be renewed and the lands should be given back to the Indigenous Hawaiians for their homesteads. Do the right thing, Mother Gaia is watching.

Russell Leong

"The Army proposes to retain up to approximately 6,300 acres of State-owned lands at three installations on the island of O‘ahu. Military training has taken place under a lease on State-owned lands at KTA, Poamoho, and MMR since 1964." "1) Full Retention, 2) Modified Retention, and 3) Minimum Retention and Access. The No Action Alternative (no retention of State-owned lands after 2029) will also be analyzed." I support the Army training in the three (3) locations identified; however, the public is not aware of the environmental mitigation that occurs in the training areas. Granted that there will always be criticisms of training activities there should be more public outreach to convey what you have already accomplished and continue to do so. That is protecting watersheds by completely installing fencing and performing ungulate control. Maintaining your training roads to reduce erosion from stormwater. I would suggest improvements to MMR and Schofield Firing Ranges(not included in EIS, but worth mentioning) by constructing large downstream sediment basins which would capture sediment before it travels further downstream. Lastly, measurement and documentation of funds spent for environmental mitigation, areas improved, and observable improvements to environmental restoration and water quality. This documentation should be posted on a public website as part of the Army's measurable and historical metrics. Russell LeongPearl City, Oahu, Hawaii

ana Denisse lepes Sanchez

United States release the land back to the indigenous people of Hawaii.

Ash Leslie

Good afternoon,
I am writing today to oppose military occupation of Hawaii. Hawaii was forced into statehood against the will of the people, and the military is illegally occupying this land. Hawaii should be it's own nation, and does not want or need interference or destruction of land caused by the U.S., a foreign, military. Remove the army and military from Hawaii.
Thank you

Maelia Leslie

Aloha. My name is Maelia Leslie and I'm a resident of Mililani. I'm calling because I want to say that I strongly oppose the extension of military leases on the lands of Makua, Kahuku, and Wahiawa. An extension of the leases will allow the military to further damage the natural resources of these areas. Destroy the natural habitats of Native Hawaiian plants and animals and continually disrupt disrupt the lives of the local community. The army has wrongfully leased these lands in the state for $1 since 1964. When the leases expire in 2029, this land should be immediately restored to the public. Thank you.

Kadence Letua

The land doesn't belong to anyone but the kanaka. Stop exploiting the islands and go do it somewhere else.

Claudia Leung

I would like to submit the follow comments regarding the Army's upcoming Environmental Impact Statement, which proposes to retain up to 6,300 acres of land on Oʻahu for military training purposes. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawaiʻi, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawaiʻi has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawaiʻi courts have also acknowledged the state's constitutional duty to mālama ʻāina. The leasing of ʻāina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ʻāina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on Oʻahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a "no action alternative" as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Waiʻanae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ʻāina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the "fair treatment of all people". Fair treatment means "no group of people should bear a disproportionate share of the negative environmental consequences". The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ʻāina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawaiʻi: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawaiʻi residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities. These military training lands are situated in communities that are majority

working-class, people of color, and Native Hawaiian. Kahuku, Waiʻanae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities. Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Waiʻanae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands. In the Ching vs. Case ruling, the court found the state to have a trust duty to "mālama ʻāina" and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using. These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through moʻolelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access. Environmental justice (EJ) as defined by the EPA requires "meaningful involvement" of impacted communities such that "decision makers will seek out and facilitate the involvement of those potentially affected." Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku.

Nikos Leverenz

I am writing to oppose the extension of leases of these properties.

The U.S. Army fails to pay adequate compensation for the use of the property. A $1 lease that extends for decades strains the ordinary definition of leasehold interests. Given the hundreds of billions in taxpayer funds expended upon Department of Defense operations in any given year, and the scarcity of land in this archipelago, more favorable lease terms would be in the tens of millions annually or more.

Further, ongoing training activities have grave environmental impacts that will likely not be adequately assessed until military operations cease and necessary remediation is undertaken by the U.S. government.

Among the properties under consideration Makua Valley deserves maximal protection given its deep and enduring cultural significance for Native Hawaiians. The continued use of the valley is an affront to them and all Hawaii residents who value our state's natural and cultural resources.

The continental United States provides a wide range of natural landscapes that can be used for Army training operations. Hawaii has limited acreage with a long list of endangered and threatened species. This land is also notably home to an indigenous population that is beset by a range of challenges that evince their ongoing dispossession: poor educational outcomes, underemployment, housing instability, higher incidence of chronic medical conditions like diabetes and heart disease, shorter life expectancies, overrepresentation in the criminal legal system, and underrepresentation in civic life.

Continuing these operations beyond the current lease terms is not warranted by any metric beyond the unconscionably gratuitous terms set forth in current leases -- agreements that should not have been executed in the first instance.

Selah Levine

I am strongly against this land retention by the military for training purposes. The threats cause by the military to the native environment of hawaii are too great. Protecting the native ecosystem and cultural sites in hawaii is more important than military training.

Danny H.C. Li

Citizens all across Hawai'i have spoken out loudly and repeatedly over many years at numerous public hearings: No Lease Renewals for the Army! The US Army has been a lousy steward on the lands they currently use for training, and it needs to use the remaining time on current lease to clean up all the toxic wastes they are leaving behind. Clean up and move out! More critically, the US military has been draining valuable funding & resources away from their better use in civilian infrastructures and employment. Stop wasting taxpayers' hard-earned money on misdirected training(in order to prepare for future overseas "expeditionary" misadventures!) Once again, let me repeat: No Lease Renewals for war preparation! Clean up and Move Out! Peace and Aloha,Danny H.C. Li (Kea'au, Hawai'i)

William Liggett

I strongly favor granting the US Army a long-term lease for training. I also urge strong state enforcement of environmental care for land that it leases.

William R. Liggett Col USAF ret

Victor Limon

Yes. Thank you so much for the opportunity to speak. This is Victor Gregor Nimon, a Filipino graduate student at the University of Hawai'i at Manoa. I was born and raised in the Philippines, where the U.S. military has a long, butconsistent track record. That record is a history of violence, death, destruction, and the rape of our women. If the U.S. military is allowed to continue occupying and desecrating Hawaiian lands, I cannot imagine how the future of my Native Hawaiian brothers and sisters would be different from what my people have suffered so far.

I applaud everyone tonight who had the courage to stand up for their sovereign rights and for what is right.

In 1992, the U.S. military was forced to withdraw from its bases in the Philippines. That was a result of a united and vigorous opposition of Filipinos and our allies around the world. I have no doubt that it is only a matter of time before that feat is repeated here in Hawai'i.

That will be a time for reckoning, and it will bring hope to other people whose lands are also illegally occupied. Mahalo.

Renie Lindley

I firmly oppose the renewal of 23,000 acres of Hawai'i public trust land at Pōhakuloa Training Area to the U.S. Army, because for 65 years the Army did not fulfill the terms of the lease. The Army has damaged native ecosystems, left unexploded ordnance, depleted uranium, and other contaminants, and harmed Native Hawaiian cultural sites. But we have the ability to hold the military accountable, and show leadership in an uncomfortable situation. As part of the condition for leasing the public lands at Pōhakuloa to the US Army, the military is supposed to maintain the environment there through regular clean-ups of unexploded munitions and other harmful by-products of live-fire testing (including depleted uranium from some of the ammunition used there, and other chemicals).

The depleted uranium being present on the land was so concerning that the Hawaii County Council overwhelmingly approved a resolution in 2008 that requested a halt to live-fire training in order to take further action on the presence of depleted uranium in PTA. The state agency with the fiduciary responsibility for enforcing this condition, and for protecting and conserving public land generally, is the Department of Land and Natural Resources.

Natalie Lindsay

Hello,
I’m writing to express my opposition to the renewal of the military’s lease on Hawaiian lands in 2029. The United States has been illegally occupying Hawaiian land for many years, and it’s time to return that land to the people who have lived there for centuries. Native Hawaiians have been forced to watch their islands be destroyed for tourism and military activities, as rent skyrockets and they are driven out of land they’ve always occupied. Please do not renew the lease on Hawaiian land, and return the land back to the indigenous people of Hawaii.
Thank you,Natalie Lindsay

Meredith Linhart

I OPPOSE THE RETENTION OF HAWAIIAN LANDS BY THE US MILITARY

Meredith Linhart

I oppose the retention/renewal of leases by the US military of native/Hawaiian lands. Instead I believe they should be designated to misplaced Hawaiian residents and natives (not including people who moved there from the mainland).

Rimona Livie

I am emailing today to say that I oppose the military occupation of Hawaii and want the land to be returned to the indigenous community there. Thank you for your time!
- Rimona Livie

Ashley Livingston

Hello, Please do not renew military leases on the lands of Mākua, Kahuku, and Wahiawā. Doing so would allow for continued destruction of natural resources and sacred land. When the leases expire in 2029 they should be returned to the Indigenous communities.Thank you

Nanea Lo

Hello, my name is Nanea Lo, and I'm a resident of Moiliili, Oahu. I'm calling because I'm strongly opposed to extension of the military leases on the lands of Makua, Kahuku, and Wahiawa. An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals. And continually disrupt the lives of the local community. The army has wrongfully leased these lands in the State for $1 since 1964 when the lease is expiring in 2029 and this land should be immediately restored to the public again.

Nicole Londoño

This Hawaiian land, this just morally wrong, stop dehumanizing the Hawaiian people on their sacred land

Joy Loo

I am against any further training in Hawai'i. We are islands, with finite resources- training, bombing, your ruining the environment & pay $1.00. Go somewhere else. Bomb somewhere else. Poison somewhere else. Abuse & take advantage of some place else.

Raudel Lopez

To whom it may concern: I am against the Department of Defense continuing to lease these lands at $1 USD a year and further suggest that the Department return these leased lands to the native peoples of Hawaii. The US occupation of Hawaii and it's lands should be rectified as quickly as possible.

La‘akea Low

La'akea Low ko inoa. No kou mokopuni o Maui. Just couple suggestions. First off, like everyone said, open the chat. Put a list of the testifiers in order so that we know when we testify. We have things to do. And also, maybe put the wahine with the clock back on the screen so that we're not interrupted when we're testifying, so we know how much time we get.

So with those suggestions in mind, I'd just like to oppose any renewals of any permits by the U.S. military. As people said, U.S. military has no jurisdiction in Hawai'i. When you folks provide the treaty of annexation, we might be able to talk about it. But without that treaty, there's really no place for the U.S. in Hawai'i.

And then as the previous testifier said in terms of the no action option, for the U.S. to threaten to Hawai'i with, well, you know, if you don't renew our permits, we not going do this, we not going do that, we not going protect, we notgoing do work related to the environment, you know, that's really, really childish of the U.S.

I mean, you guys been getting a deal, dollar for 65 years, and unless we adhere to your folks' request, you folks can just, you know, ship out. And if that's what it is, then as long as you guys ship out, then that's good, too. Take all of the military personnel with you guys. They just, you know, disrespecting our 'aina, raising the cost of living in Hawai'i, you know.

And all of the military, they claim to fight for freedom and this and that, but they fail to recognize the freedom of Hawai'i. And a lot of that is a sham. We know a lot of the service members are serving because of the benefits, because of the pay, and to say they're fighting for our freedom is a sham. They fighting for free college and survive,for their housing benefits and education benefits and the paycheck.

And so the sooner the U.S. leaves, the better. The better for everyone involved. And we seen what's happened on Mauna Kea and elsewhere throughout the islands, Maui, Haleakala, where kanaka are mobilizing.

That's what I mean. You guys got to do something about that. Try find a way for not interrupt the testifiers. I mean, you guys already took up choke time with that presentation that we could find online without having to go through all that and waiting all night to testify.

And so I'll just say the sooner the U.S. leaves Hawai'i, the better. We all know Hawai'i is illegally occupied. The so-called state of Hawai'i, the fake state, has no jurisdiction. Neither does the U.S. military, the United States of America. And so just leave as soon as possible, and the sooner, the better.

Aracely Lozano

Hello,

I am writing in solidarity of the land. Hawaii has and always will be a sovereign territory as the active volcano is always truly making decisions for the land. I am urging these projects to stop the abuse and exploitation of the islands. Enough with the pain that has been caused on the la d and the people. I strongly advise to humble yourselves and allow yourselves to be guided by the lands people. Hawaii is stolen territory just like the majority of what is called USA. It belongs to no one but those that care and tend to her. At these rates of your expansion there will no longer be a plant to live on, I am disgusted by the atrocities the US military and government continue to perpetuate. Stop now!

Jessica LT

123 years ago, the US illegally stole Hawai'i and invaded the islands with armed military based at the front of 'Iolani Palace. Today, there are still military leases on wahi pana. I demand that these lands be returned and restored to natives. Discontinue military training in Hawai'i.

Julie M

"Aloha. My name is Julie M and I'm a resident of Honolulu. I am strongly opposed to the extension of military leases on the lands of Makua, Kahuku, and Wahiawa. The extension of these leases will allow the military to further damage natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals, to continually disrupt the live to the local community. The United States Army has wrongfully leased these lands from the state for $1 since 1964. When these leases expire in 2020, this land should be immediately restored to the public and the people. Thank you"

Eleanor M Eisler

Aloha.
since the establishment of military occupation of native lands in 1964, the united states army has paid a total of 57 dollars. That's a measly one dollar per year. When comparing a map of military occupied Oahu and land reserved native homestead, the disparity is horrifying. Military occupation of these lands negativity impacts local flora and fauna in large quantities, not to mention the population of native people that were killed just for you to have the land in the first place. Please return the land to it's rightful stewards in hopes that one day it's natural beauty and significance may be restored.

Kauwila M.

(Speaking Hawaiian.)I oppose this bill attempting to extend the militaryleases of public lands at Makua, Kahuku, Poamoho. Weare tired of appealing to the morality of a stateand military who continues to subjugate and degradeour land and our people. American military's purported yearning fornational security is a fallacy. How can you havenational security when you stole land, forciblyevicted our people, and created a never-ending cycleof houselessness in our home lands? The underlying question, then, is are weAmerican or not? Are we part of this purportednational security plan? Are you willing to admitthat Americans are the terrorists in Hawai'i, Guam,Okinawa, and the many indigenous nationsinterisland? We are not American. We will die asHawaiians and live on forever as kanaka oiwi. Theyhave more broken promises than broken treaties. The EIS are broken (indiscernible) to continue to latch on to. We say lawa. Enough already. Here are some concepts I know you missed.Every single speck of dust and dirt is an amalgam ofseven particular Hawaiian gods -- Kane, Ku, Kanaloa,Lono, Haumea, Papa, Waliu'u. Prior to ending yourscope, you must document every single rain and windname on -- we haven't even begun to do our research. We have documented the Land Commissionwars to people from the Hawaiian Kingdom. The wholeWaialua water table has changed, and it is welldocumented and kept, so you have to research that,too. I've seen at least 47 chats online in Hawaiianlanguage newspapers for Makua alone. There arecountless others. (Speaking Hawaiian.)People around the world are occupied by Americanforces and are eating stones while the Americanmilitary's insatiable hunger for bodies sustainsimperialism and exceptionalism by which theycontinue to rape and kill people and land. Just because it isn't a spectacle doesn't mean my people aren't dying. We still remember theAmerican general who shot the sole bullet in theI'olani Palace and killed a guardsman on January16th, the day before the overthrow in 1893. We still remember the way that theAmerican Navy shot at 13-year-old kids in the 1895Wilcox rebellion. We still remember the forcedevictions in Makua and Waimanalo by the U.S. Army. We also remember the way that we got toreestablish our ancestor relationship withKaho'olawe when we defeated the Navy in court. Wealso remember the way the winds and rains carry ourchants into the ringing ears of our people were thebursts of bombs. We also remember that this land, ourancestor has a maluhia and protects us, and weprotect her. O kealoha 'aina ka mea ku aia oe. Aloha'aina will be the demise of the American empire.Land back. Ho'iho'i ke ku'oko'a. Mahalo.

Navroop Maan

I am asking you to discontinue military training in Hawai’i and give the land back to its people.
Sincerely, Navroop Maan

Roop Maan

We must end the military occupation in Hawaii. Do not extend the lease and give Hawaii back to its people. Enough is enough. Find somewhere on the mainland to train.

Samantha Maas

To whom this concerns,
My name is Samantha Maas and I am a resident of Arizona. I strongly oppose the extension of the lease that allows the US military to occupy and practice military strikes on Hawaiian land in Mākua, Kahuku, Wahiawā. This land belongs to native Hawaiians and should be returned to them. An extension will further destroy the land and its resources and further the housing crisis for native Hawaiians. When the lease ends, the land should be given back to the public.
Sincerely,Samantha Maas

Sage Mackenzie

Aloha, My name is Sage and I am a resident of Portland, OR. I am strongly opposed to the extension of military leases in the lands of Makua, Kahuku, Wahiawa. An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals, and continually disrupt the lives of the local community. The army has wrongfully leased these lands from the state for $1 since 1964. When the leases expire in 2029, this land should be immediately restored to the public, particularly the indigenous peoples of Hawaii who are the rightful stewards of the land.
Thank you,
Sage

Uahikea Maile

Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a “no action alternative” as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the “fair treatment of all people”. Fair treatment means “no group of people should bear a disproportionate share of the negative environmental consequences”. The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. In 1997, the CEQ produced a guide titled “Considering Cumulative Effects Under the National Environmental Policy Act” which provides a framework for advancing environmental impact analysis by addressing cumulative effects in either an environmental assessment (EA) or an environmental impact statement. The EIS should employ this framework in order to address the cumulative effects of all related military activities, not just the proposed project. US militarism has affected not only Kānaka Maoli, but other diverse communities

of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities. These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai‘anae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities. Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Wai‘anae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands. In the Ching vs. Case ruling, the court found the state to have a trust duty to “mālama ‘āina” and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using. These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through mo‘olelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access. Environmental justice (EJ) as defined by the EPA requires “meaningful involvement” of impacted communities such that “decision makers will seek out and facilitate the involvement of those potentially affected.” Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Wai‘anae, Wahiawā, or Kahuku.

Elise Maize

"Hello, my name is Elise Maize and I'm a resident of Hilo, Hawaii and strongly opposed to the extension of military leases on the land of Makua, Kahuku, Wahiawa, and Pohakuloa on the Big Island. When these leases expire in 2029 this land to be immediately restored to the public. And The EIS should focus on the natural resources of the area, the natural habitats of Native Hawaiian plants and animals and as possible, the disruption to the lives of the local community. Thank you. "

Miranda Makaruk

123 Years Ago Today, the US illegally stole the Hawaiians' Kingdom, lowered their hae Hawai'i, & invaded their islands with armed military based at the front of 'Iolani Palace.123 Years Ago Today, We are still opposing these illegal occupiers & protesting military leases on their sacred wahi pana. We are demanding these lands to be returned & restored back to the Hawaiian People. We are asking to discontinue the abuse of their home for colonizer military trainings.
Thank You for your time,To whom who may listen

Jeremiah Mangini

The Military should not be using this land for training facilities. Therefore the Lease shouldn't be extended. Instead of trying to keep the lease invest money in Native Hawaiians. If you so insist on making the lease longer (which you shouldn't) at least pay Hawaiians much money for it.

Joelene Manuel

Aloha please understand this land doe'snt belong to me or you. It belongs to the natural course of life and inheritance. The hawaiians lived on this island long before you came. $1 is not a fair price because it was never on sale. Listen to your heart.

Marian Marcigan

I think the land the military uses for training is a very useful way to use this land. We also see a great benefit to our local community through military spending on our island.

Malia Marquez

Aloha kākou, my name is Malia Lum Kawaihoa Marquez and I am a lifelong resident of Maunalua (Hawai'i Kai). First, I would like to acknowledge you and the "jobs" you are asked to do here in Hawai'i nei. The military has been here since the illegal overthrow of our kingdom. Our 'āina has been misused and damaged by the military for a very long time. It seemed like a miracle when our Hawaiian heros were able to stop the bombing on our "piko", our precious Kaho'olawe. Hawaiians going up against the U.S. military seems undoable. But we were able to STOP that bombing so nothing is impossible. Our voices matter, our lands matter, and its time to right the wrong that was done to our islands. America has much open space to practice its warring tactics. Hawai'i should NOT be a place to do such unfathomable acts of desecration. Land is 'āina, our ancestors are 'āina, WE (Hawaiians) are 'āina. I strongly oppose any sort of land extension for military use on our precious lands. The military needs to set forth a plan to clean up our 'āina before 2029 and give our LAND BACK. Me ka ha'aha'a (with humbleness), Malia Marquez.

Malia Marquez

Aloha. My name is Malia Kawaihoa Marquez and I am a resident of Moanalua, also known as Hawaii Kai. I am strongly opposed to the extension of military leases on our aina of Makua, Kahuku, and Wahiawa. An extension of these leases will allow the military to further damage the natural resources of these areas, destroy our natural habitat of Native Hawaiian plants and animals and continually disrupt the lives of our local communities. The Army has wrongfully leased these lands from the state for $1 since 1964. When the leases expire in 2029, this land should be immediately restored to our public. Mahalo for your time. Aloha. A hui hou.

Gladis Marquez

Stop US Military Lease Extensions On Hawaiian People's Lands!

Dylan Marquis

Hello, my name is Dylan Marquis. I'm a resident of Bishop California I'm strongly opposed of the extension of the military leasing on the land of the Makua, Kahuku, and Wahuwa [Wahiawa] tribes. I just, you know, just appalled at the idea that there are there's any military activity in a place like Hawaii, which is out so insulated by the ocean and such a beautiful place. If you can please call back at this number and let me hear your side of the story. But again, I'm just so strongly opposed to Military leasing in Hawaii. Thank you.

Mahealani Martin

Aloha to all US Army Personnel,
A Declaration of War was signed this year by OFH ARMY Colonel Sam Lilikoi and US Navy Lt Colonel Beaumont dated Jan. 17, 2021. We are at war with the US which means Marshall law for Americans in Hawaii. We want you guys to cleanup your opala and leave. Your time here is done!! Your disregard for trashing the island is done!! You have been occupying the islands for far too long!! We are done with you!! Get out of Hawaii now!!War crimes have been documented!!Mahealani Martin
Sent from my iPhone

Indira Martinez

I strongly oppose the extension of military leases in Makua, Wahiawa, and Kahuku. We are in a climate crisis, and need to take unprecedented steps in order to prevent massive loss of life. Extending the contract would mean extending the contract on environmental destruction and degradation. The continued environmental and economic impacts of the US military's exercises in Vieques, Puerto Rico has been devastating to local communities and the environment. The sooner the military leaves, the sooner the cleanup and restoration can begin.

Kaipo Matsumoto

Aloha pumehana kakou. ...Ea. A nui ku lahui. Alohato the wonderful ASL translators, too. Mahalo nui. You guys are all killing it. Aloha, Kehau.Salutations, Colonel Misigoy. My name is Kaipo Matsumoto. I'm a master'scandidate in history at the University of Hawai'i. Ialso hold a bachelor's degree in history andliterature from Harvard University. I was raised inHonouliuli on the Ewa plain in the westernmost bayof Pu'uloa, also know as the West Loch of PearlHarbor. I grew up not far from a place referred toas Jigoku-Dani, or Hell Valley, in Japanese, thelargest and longest used internment camp forAmerican citizens of Japanese descent in our islandsin World War II. I invoke this indefensiblehistorical scar for one reason, that the U.S.military built an internment camp that should havenever existed. Sixty-five-year leases for 6,300 acres forone dollar should have never existed, and theyshould not be renewed, not in 2029, and not ever. Just to clear things up to the military,Colonel Misigoy, land in Hawai'i is assets toHawaiians' 'aina and family, and as we all know tothe both of us, 'aina is power. And that is thebasis from which we reject the very premise of thisscoping process, as mentioned before by so many ofthose who spoke. The scoping process belies the very terms of the military's lessee position. But in the spirit of lip service, let'stalk story. Those that prepare for war are thosethat expect and look for it. And those that look forwar will always find it at home. So when we drive our kids to school andthey ask us why there are Humvees on our freewaysand they ask us who we are fighting, the only answerwe have to offer is that they are fighting thosethey purport to protect. We deem aloha Hawai'i, where we do notfight to be ourselves. So we call for environmentalimpact statements that don't just allow the [HEPA], itneeds to follow the [HEPA] and [HEPA] laws. We call forstatements that take into account the very communitylive fire training ostensibly protecting [HEPA]. We call for environment impact statementsthat make legible the impact of military expenditureand exercises on not only our material lives, butour affected lives, which is the life of our 'aina.... I got you. Yeah, I goingwrap up. Okay. Before I go, I just wanted to echowhat Sister Emma Koa said yesterday. E, you guysbetter buckle up, bro, from Guam to the Philippinesto Okinawa and beyond, Oceania, bro, we hear and werising. And we rising faster than you guys cancontribute to sea level rise.(Speaking Hawaiian). For those thatchoose, our purpose will always be alone for this'aina. Mahalo nui to all that shared. E alohaHawai'i a mau loa. Mahalo.

Lahela Mattos

"Aloha mai my name is Lahela Mattos and I'm initially from Arizona, but I'm a resident of Pearl City right now and I am kanaka maoli. I am strongly opposed to the extension of military leases on the lands of Makua, Kahuku, and Wahiawa. An extension of these leases will allow the military to further damage the natural resources of this area, destroy the natural habitats of Native Hawaiian plants and animals and continually disrupt the lives of the local community. I've seen it firsthand of the natural habitats and native plants that I tried to look for not being accessible to me anymore. So army has already wrongfully least these lands from the state for $1 since 1964 and when the leases expire in 2029 the land should be immediately restored back to the public and back to kanaka maoli. Once again, my name is Lahela Mattos and I am strongly opposed to the extension of military leases on the land of Makua, Kahuku, and Wahiawa. Thank you. "

Rebecca Mattos

"I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... Hawai'i exists as a place of Aloha, to be a shining light to the world and show that we can learn from our ancestors about proper land and resource management, not only for present day society, for generations to come. We have come to a point that the destruction on these lands by the military is no longer serving a purpose except to prolong war and violence. Look at the recent situation in Afghanistan- 20 years and 4 trillion dollars spent, and thousands of lives lost in vain- women, children Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state's constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a "no action alternative" as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the "fair treatment of all people". Fair treatment means "no group of people should bear a disproportionate share of the negative environmental consequences". The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons

testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities. These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai‘anae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities. Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Wai‘anae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands. In the Ching vs. Case ruling, the court found the state to have a trust duty to “mālama ‘āina” and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using. These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through mo‘olelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access. Environmental justice (EJ) as defined by the EPA requires “meaningful involvement” of impacted communities such that “decision makers will seek out and facilitate the involvement of those potentially affected.” Given the immense pressures that the COVID-19 pandemic has place d on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Wai‘anae, Wahiawā, or Kahuku. I have military members in my extended family and many friends who have served in the military- some very high ranking. I have heard first hand from them of the devastation that war has caused them, and even had many military friends commit suicide or succumb to addiction, domestic violence, and PTSD. They talk about how useless and costly war

is- from the financial impact to the human impact. We are evolved enough to know that we can settle our differences in a different way and it is up to us to act different. I have personally been to Kaho'olawe and Kahuku to do beach cleanups and found UXO, amongst all the plastic pollution. Our lands our hurting enough, it is time to return the land to the people of Hawaii and use it to actually heal what is broken- to provide a place for agriculture and education, to honor kupuna and clean up all of the ammunitions. We must do this, it is the only way to ensure a future for us all and our children.

Maya Maxym

Hello. Hi. This is Maya Maxym and I am a resident, a non-Hawaiian, residents on Oahu, civilian. And I'm calling to oppose extension of the land leases for the military, given that we have one of the worst housing crises in the entire nation, and that a large number of Native Hawaiians don't have the opportunity to live in decent housing, much less own their own homes on their own land, so it's time to stop extending those leases and respect the people on this island we live. Mahalo

Stanley May

I am in favor of renewing the lease to the Army for lands on Oahu used for training.

Bella Mayvaras

GET THE US MILITARY OUT OF HAWAII!!! YOU ARE DESTROYING THEIR LAND. Give their land back.

Tori McAllister

Respectfully, the US Military should never have occupied Hawaii in the first place. The land needs to go back to the natives. Do not renew your lease, please.

Brenda McCallum

Too much land desecration and lack of environmental and cultural preservation for more than half a century. It's our duty to speak up in the name of the 'Aina's best interests. Find another land or better yet consolidate. At least allow some time for that land to heal from the amount of traffic, explosions, and pollutions that it has had to sustain for this long period of time. We are pleading with you to do what is right according to the place that you are inhabiting! Malama Aina, figure out a better solution for your needs. Mahalo!

Sorcha McCarrey

I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... As a member of the Party for Socialism and Liberation, I support full self-determination and reparations for the Kānaka Maoli.

Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good.

These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts.

The EIS process currently considers a “no action alternative” as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored.

Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the “fair treatment of all people”. Fair treatment means “no group of people should bear a disproportionate share of the negative environmental consequences”. The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world.

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National Environmental Policy Act" which provides a framework for advancing environmental impact analysis by addressing cumulative effects in either an environmental assessment (EA) or an environmental impact statement. The EIS should employ this framework in order to address the cumulative effects of all related military activities, not just the proposed project.

US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities.

These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai‘anae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities.

Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Wai‘anae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands.

In the Ching vs. Case ruling, the court found the state to have a trust duty to "mālama ‘āina" and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using.

These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through mo‘olelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access.

Environmental justice (EJ) as defined by the EPA requires “meaningful involvement” of impacted communities such that “decision makers will seek out and facilitate the involvement of those potentially affected.” Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku.

My name is Sorcha, I am a haole who grew up in Lāʻie, on the North Shore of Oʻahu, where I attended Kahuku High School. It wasnʻt until after highschool that I learned of Hawaiʻi as center of the Pacific. And it wasnʻt until after that that I learned not only is Hawaiʻi the center of the Pacific, it is the center of U.S. imperialism in the Pacific. From here, the U.S. pursues its agenda of endless war and military aggression towards other colonized nations.The United States has been engaged in armed open conflict with other countries twenty-three of the twenty-five years I have been alive, and has militarily occupied Hawaiʻi for over four times that. Hawaiʻiʻs lands and Hawaiʻiʻs people, the Kānaka Maoli, are treated as raw extractable commodities to fuel the U.S. war machine, which currently sends soldiers, weapons, and terror abroad to people in Somalia, Iraq, Afghanistan, Syria, Palestine, and elsewhere, not to mention beats its war drums in anticipation of intervention in Cuba and war with China. All fuelled by the occupation of Hawaiʻi and abuse of its people. And the U.S. military is no stranger to using and abusing fuel, as the worldʻs largest polluter, using 21 billion liters of fuel every year, more than the total carbon emissions of Denmark. Our armed forces create 750,000 tons of toxic waste every year. The military continues to pollute here as well, as we know--of what we know, that is, of depleted uranium being shot and scattered to the wind, mountains, ocean, and soil of this land, of this ʻāina. There is a profound entitlement with which the U.S. military presumes to occupy these lands, resting on not only the absence of recognition of any wrong being done to the self-determining people of Hawaiʻi, but not even affording the barest pretense of reparation for the harm acknowledged in name only by the U.S. government when it “apologized” for its role in the illegal overthrow. 1 dollar will never be enough for sixty-five more years of continued abuse, occupation, and export of the same on a broad international scale. Self-determination and reparations for the Hawaiian people!

Sorcha McCarrey

Yeah. It's Sorcha McCarrey.... I'm reading astatement on behalf of my political party, the partyfor socialism and liberation. My name is Sorcha. Iam a haole who grew up in Lai'e on the North Shoreof Oahu, where I attended Kahuku High School. It wasn't until after high school that Ilearned of Hawai'i as center of the Pacific, and itwasn't until after that that I learned that not only is Hawai'i the center of the Pacific, it's thecenter of U.S. imperialism in the Pacific. From here, the U.S. pursues its agenda ofendless war and military aggression towards othercolonized nations. The United States has beenengaged in armed open conflict with other countries23 of the 25 years I have been alive and hasmilitarily occupied Hawai'i for over four timesthat. Hawai'i's lands and Hawai'i's people, thekanaka maoli, are treated as raw, extractablecommodities to fuel the U.S. war machine, whichcurrently sends soldiers, weapons, and terror abroadto people in Somalia, Iraq, Afghanistan, Syria,Palestine, and elsewhere, not to mention it beatsits war drums in anticipation of intervention inCuba and war with China -- all fueled by theoccupation of Hawai'i and abuse of its people. The U.S. military is no stranger to usingand abusing fuel -- as the world's largest polluter,using 21 billion liters of fuel every year, morethan the total carbon emissions of Denmark. Ourarmed forces created 750,000 tons of toxic wasteevery year. The military continues to pollute here aswell, as we know -- of what we know, that is, ofdepleted uranium being shot and scattered to thewind, mountains, ocean, and soil of this land, ofthis 'aina. There's a profound entitlement with whichthe U.S. military presumes to occupy these lands,resting on not only the absence of recognition ofany wrong being done to the self-determining peopleof Hawai'i, but not even affording the barestpretense of reparation for the harm acknowledged --in name only -- by the U.S. government when itapologized for its role in the illegal overthrow. One dollar will never be enough for 65more years of continued abuse, occupation, andexport of the same on a broad international scale.Self-determination and reparations for the Hawaiianpeople.... Yes. That's it. Thank you.

Mara McCart

give hawaii back to it's people get out

August 28, 2021

OAHU ATLR EIS Comments
P.O. Box 3444
Honolulu, HI. 96801-3444

I am writing to comment on the proposed renewal of the Army leases for both the Kawailoa/Poamoho Training Area on Hawai'I Island (23,000 acres), the Kawailoa/Poamoho Training Area(4,370 acres), the Kahuku Training Area (1.170 acres) and the Makua Military Reservationh (760 acres). The Army has been paying $1/year for 65-year leases on this land. This is an outrage on so many levels!

As a kupuna(elder) in the Hawaiian community, I am appalled and extremely devastated at the U.S. government's continued use of Hawaiian lands for these training purposes. Land ('aina) is precious to the Hawaiian people; it is what sustained our kupuna from the discovery of the Hawaiian islands to the greedy takeover of this very special place at the overthrow of our Queen in the late 1800's. Today, thanks to the continued governmental takeover – overthrow, annexation, statehood, etc., Hawaii imports the vast majority of its food, with one big reason being that our lands are not available or unable(not healthy enough, water sources not available or blocked by outdated leases,, etc.) to provide what it did for our ancestors. Hawaiians believe land is precious, and it is – it can provide the means to which one can feed his/her family, a place for that family to live, etc. The streams that flow through these lands provide food as well, recreation for our families, teaching opportunities for our keiki (children), etc.

The United States military has unfortunately overused, gutted and frankly cheated the Hawaiian people out of its very life source. This has to stop. Return Hawaiian lands to Hawaiian hands, remove all live ordinance, and provide restitution to the Hawaiian people monetarily to help our lands "live" again.

One last comment – I was unable to send an email to post this in appropriate email form and also unable to get on to the online comment form. I do hope this was not done on purpose, to limit public comment. I also hope that this letter reaches the appropriate office by Sept. 1st, the deadline, and if not, that it will be a part of the public commentary made during this period in spite of being unable to access the above.

J. Mahealani McClellan

MEGAN MCCLELLAN

The U.s. military should not have access to this much land. It's stolen and unnecessary. In this day and age, you should lead by example and give the Natives back their land before Hawaiian turns in to another bikini bay.

Shannon McClish

I am writing in opposition to this project due to concern for the natural environment and local community that would be adversely affected. The land in question in indigenous land, and the military does not have the right to go forward. The natural ecosystems in Hawaii are under incredible stress and pollution from spills into water bodies will only make it worse such as previous Military Nitrate spills into the ocean that increased Honu mortality). Additionally in a climate crisis the high carbon emissions associated with military operations is unacceptable. This is not a project that is in the islands best interest.

Douglas McCracken

Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good.

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These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai‘anae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities.
Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Wai‘anae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands.
In the Ching vs. Case ruling, the court found the state to have a trust duty to “mālama ‘āina” and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using.
These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through mo‘olelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access.
Environmental justice (EJ) as defined by the EPA requires “meaningful involvement” of impacted communities such that “decision makers will seek out and facilitate the involvement of those potentially affected.” Given the immense pressures that the COVID-19 pandemic has placed on our

communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku.

Finn McFadden

The army must relinquish these lands at the end of their lease and return their ownership to the Hawaiian people. This land must be maintained by and for Native Hawaiians in order to help maintain the delicate ecosystem in Hawaii.

Gigi McGaughey

I vehemently oppose the army's intention to extend their lease on land stolen from native Hawaiians. The United States has exploited this land and its people for far too long and the least of the reparations they can make is to return the land to natives. Shame on the US military for even suggesting they continue to perpetuate the harms they have caused on land that is not rightfully theirs. The American people do NOT support the US army's continued exploitation of Hawaii.

Kahoiwai McGee

I'm just gonna keep it short and simple. The islands of Hawai'i have been inhabited by one too many foreigners over the past century. And with that also came with the rise in the cost of living. We natives struggle to find affordable housing on our own land. The United States Army had signed a $1 lease in 1964 for a total of 65 years. Not only is the price outrageously inexpensive but the Army has also violated the agreement by damaging countless native ecosystems, left depleted uranium and other contaminants. Oh and not to mention the bombing of Kaho'olawe that took place before in 1941. The islands of Hawai'i are not the Militaries test subjects! Due to what's been going on it shows that they have no care whatsoever for the well being of our islands. And that we are in fact the Militaries test subjects, 'a'ole (no). Enough is enough. While we are grateful all the Army does for us, we do not appreciate our land being destroyed. Enough is ENOUGH. Mālama 'Āina. Take care of our land! We don't have much it
left and if you are going to inhabit our 'āina then it is your kuleana to mālama our 'āina. Our land was taken from us and it is time we get it back. Do not allow the Army to inhabit the Hawai'i Islands anymore. Do not extend the lease. The Army hasn't been keeping up with the inspection of the bases for a clear reason. They are ruining our islands and don't want to be held accountable for it.

Kyleigh McGuire

I am strongly opposed to the extension of military leases on the lands of Makua, Kahuku, and Wahiawa.

Keith McHugh

Hello,

I do not want my tax dollars to continue to fund a military presence on Oahu. There is no need for an army base here and continuing to fund this takes land away from Hawaiians for no purpose. Give this land back; stop playing war games.

Peace,
Keith

Nedi McKnight

Aloha kākou,
I respectfully ask that the U.S. Army no longer be granted leases for State Lands in Hawai‘i. Of course we all understand that the soldiers must train, but using Hawai‘i as a training ground is not working. The military has proved, through many years, that military training and ecological preservation do not go hand in hand.
The world is a big place and we know that our military‘s technology and strategy has evolved. There is no longer a need to blow up or shoot weapons in a fragile island ecosystem. The Army has proved that they are not able (not out of malice- it is simply mechanics) to be good stewards of the land.
There is NO reason, when kānaka maoli (Native Hawaiians) are going homeless or being forced to live in very expensive substandard housing, that state lands should be leased to the military for outrageously low amounts.
Residents know that military families drive up rent (because they have subsidies) and buy up housing. This causes housing shortages. Residents know that military families shop at the PBX, not local. The young soldiers (regardless of rules) drink to excess in Honolulu and in our neighborhoods. We hear and feel the bombs go off on the Island of Hawai‘i.
We see and breathe in the military pollution.There is no reason! Military is very high tech now. We don‘t need all these training facilities, and certainly don‘t need them on small, densely populated islands.
Find somewhere else to train. We understand that Hawai‘i is geographically and strategically important. That doesn‘t mean you have to train here.
Kind regards,Nedi McKnight

Adriene McNeil

"Aloha. My name is Adriene McNeil and I'm a resident of Honolulu. I am strongly opposed to the extension of military houses on lands of Makua, Kahuku, and Wahiawa. An extension of these leases will allow the military to further damage the natural resources of these areas, destroy natural habitat of Native Hawaiian plants and animals and continually disrupt the lives of the local community. The army has wrongfully leased these lands from the state for $1 some fucking bullshit. Since 1964 pardon my French. Sorry, a little frustrated from the state for $1 since 1964 when the lease is expiring 2029 this land should be immediately this land should be immediately restored to the public. Thank you for your time. "

Teddy McNerney

Hello, I hope this email finds you well.
I am writing to you to demand that you end the US Leases in Hawai'i. They are damaging the country catastrophically for the benefit of the elite. Restore and return the lands to the people they rightfully belong to.
Stop your military programs in countries you have no right to set foot in.

Sarah McPhie

The lease should not be renewed. If there is no question about it being renewed, there are many things that could be done to reduce negative impact on the island of Hawaii and its indigenous people. One example is that a smaller area could be leased at a fair market rate. Please consider other ways to reduce harm to indefinite people and wildlife.

Kelly McQueston

Leave! It's not your land.

Sierra Mcveigh

#landback

Alfred Medeires

Aloha. My name is Alfred Keakuhana Medeires. I want to comment about what's going on with the military extension of lease. I believe we shouldn't extend anymore leases to the military on any of the Hawaii lands. It doesn't matter whether it is Kahuku, Makua, wherever it may be. For the fact is, the military does not take care of the land. The people of this land, actually take care of the land. The military has been destroying our land -- look at Pohakuloa, look at Makua, look at everywhere else in between. The continual of extensions of the land to the military will just continue the same things over and over again. And I'm against that. You know, there's no respect involved. You guys don't pay nothing for the land, you know, basically, releasing it to you for no reason. You know you guys are destroying it every single time. Every single chance to get. You know, I'm calling on behalf of my family--military veterans, you know, my mom, my dad, my sister, my brother, you know, is this Is just ridiculous what you guys are doing. You guys have no consideration to the people you know. You guys have to do something about it. And we're going to do something about it. If there's nothing so I say no to any more extension of the land, regardless of the environmental impact statement because it's already been shown that you don't even need that. To just to see what's going on. Look at Pohakuloa, what you guys did, look at Makua, what has been done. So, please guys review your history review your research, do your guys homework because we have done it. Aloha

Alfred Keaka Hiona Medeiros

Okay. So aloha, everybody. My name is Alfred Keaka Hiona Medeiros. I'm from a group called The Military Ain't Shit. Simple as this. I don't care where you guys do your environmental impact statements at. The militarycontinues to destroy our "aina, our land, and disregard our people of this land. Simple as that.

You guys come here tax-free with dollar for 65-year leases. That is just ridiculous when we have a waiting list of 37,000 to 42,000 Hawaiians without land.

You guys totally disregard any respect for anybody in the culture and continue destruction of our land. Look what's happened to Pohakuloa. Look at Makua. Look at everything that continues to be going on. You guys got to see that the people of Hawai'i has had enough. When we say enough is enough, that means enough.

2029 should not be continued. It should not even be a number for what you guys. You guys should be removed immediately from our land. Simple. Plain and simple.

And I'm coming from somebody that was raised with a military family. My mom, my dad, my sister, my brother, my whole family, they pretty much served their time. My dad was in Vietnam. You know, my mom had served. You know, everybody served.

But it's not a hit on the military itself. It's the people that are behind the military that continue to disregard anybody -- I mean anybody. You guys have no concern for anybody. You guys believe you guys are the elite, but you guys are not the elite.

You guys are in Hawai'i nei, a place of our people, of kanaka maoli. This is our island. This is what we protect. You guys have demonstrated over and over you guys only know how to destruct. Simple as that. I'm going to talk until you guys cut me off. Simple as that. You don't tell me. I'm -- you guys' time is coming to an end. Like I said, my name is Al Medeiros, and my group is called The Military Ain't Shit. Aloha.

Denise Medeiros

Hi, my name is Denise Kawale Medeiros. I reside on Hawaii Island, and I was a resident of XX street Makaha, close to Makua. And I also used to live in the Makua Beach Park. And 70 considered squatters not so. We were not ever squatters, but we have My testimony is going against and against this is is an opposition of extending military leases in Makua, Kahuku, and Wahiawa. I feel that they have been there too long. They have done enough, it has done enough damage. I had done a study when I was attending Windward Community College in the 1990s. There, I found that there was a very rare, rare snail a tree snail that lived in Makua Valley on a single bush their whole life. That whole life of the snails existed on a single bush. And there were many, there were many smells at one time. In the 1990s, there were very few left. Today I ask you. How many of this very rare snails exist? In comparison to 1990s. How much of the Government, the United States military--occupiers of Hawaii nei--has ever done anything that is right for the land of Hawaii, for the areas that they have bombed. I say no, I oppose it out right. I come from Waikane Valley as well where I resided for over 15 years as a farmer; and then Waikane Valley was left a lot of ordnances and have left ordnances lying around every * where you've been. Extending your stay here does not protect our country, Hawaii. Hawaii. And as a subject of Hawaii, I say no. To any further occupation of the United States military on our property. This has gone on too long. I asked that you folks abide by them, by the mere fact that you know you are occupied, and it means you need to remove yourself. And I do not appreciate, nor do I accept any further extension of your leases anywhere. Makua, Kahuku and it's just, it just should be all done. Complete. Finished. So I oppose it. I oppose ever extending anymore military leases--Makua, Kahuku, Wahiawa--just to name three, because there are many more that need to end. Thank you. And my callback number is XXX-XXX-XXX. My address XXXXXX XXXX Dr., XXXX, Hawaii XXXX

Jaerick Medeiros-Garcia

Aloha, Kehau ...First and foremost, mahalo to everybody that is in opposition to this situation. My name is Jaerick Medeiros-Garcia. I am from Moku O Keawe, from the Big Island. I stand in opposition to this extension of lease for the U.S. military. It's kind of a touchy situation for a lot of people, but also, you know, American know that they're illegally occupying our lands. They illegally seized it, you know. President Clinton signed the apology letter. And, you know, this mind- boggles me to know that if I was to have something - - if I did something and they said illegal, you know, like how it's illegal occupation, I would be standing in front of court and probably thrown in jail. Why isn't anything happening to the U.S. military? The amount they pay on what they do? Man, we just lost acreage here on the Big Island, and they're right there on Hawaiian Home Lands, never offered nothing, no help, right there. They could have helped us with that fire, saved the lands, and all that stuff. You know, it's sad to see what's going on, and I know it's frustrating for a lot, especially our kupuna that can't participate in this or our kupuna that just can't speak in front of people. This has got to stop already. I mean, I'm pretty sure America can go and hijack someone else. I mean, we didn't have hostage for how long, you know. Let it go already. Now they're saying no presence on the Big Island. Great. We don't need that. We really don't need it. Now they're trying to take over our mauna. We all know TMT is for the military. They just got to leave. I'm in a position to say mahalo to you guys setting all this up. Mahalo very much. Thank you.

Kalia Medeiros

I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because...
De-occupy the Hawaiian islands.doesn't help natives, doesn't help locals. End military occupation in the islands. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state's constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good.
These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts.
The EIS process currently considers a "no action alternative" as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored.
Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the "fair treatment of all people". Fair treatment means "no group of people should bear a disproportionate share of the negative environmental consequences". The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world.
These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. In 1997, the CEQ produced a guide titled "Considering Cumulative Effects Under the National Environmental Policy Act" which provides a framework for advancing environmental

impact analysis by addressing cumulative effects in either an environmental assessment (EA) or an environmental impact statement. The EIS should employ this framework in order to address the cumulative effects of all related military activities, not just the proposed project.
Environmental justice (EJ) as defined by the EPA requires “meaningful involvement” of impacted communities such that “decision makers will seek out and facilitate the involvement of those potentially affected.” Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku.

Mollie Meiner

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Larry Meisgeier

Do not lease public land to the US Military. It only adds to tension with China and preparations for war on our part. Thank you!
Larry MeisgeierMilwaukee, WI

Fabienne Melchior

Okay. My name is Fabienne,and I'm a haole, but I'm a permanent resident inHawai'i. I was brought a little bit all over theplace. Specifically, I spent my first 12 years in the French colonies in Asia and Africa and later had the distinct displeasure of looking at American soldiers in Vietnam, which I consider being more my -- my heart home. I totally oppose anything that would be to continue that war mentality that we're in right now, especially in America, where basically, this is the largest empire ever. I believe there is something like 9,000 bases for the military around this little planet that we're very, very fast destroying. And if we continue to do the things that have not worked before, guess what? Nothing's going to change. It's the definition of insanity, and we have to stop this violence that begets violence. And starts with enough with the military. Enough with not being able to take care of people and give good health. Enough with the way we treat people that don't look like us. And enough with the disrespect for other people's cultures. And by the way, I lived many years in Tahiti. It's different there, but it's still a colony, except they -- they are regaining their islands. And if the military stays here, it's not going to happen here. Mahalo. Thank you for listening.

Martin Melkonian

Dear Sirs:I urge that Hawaii refuse to lease public land to the military.That land should be used to preserve the ecological beauty of these precious islands and not for the purpose of war training.Let us in our small way contribute to peaceful coexistence with our Chinese brothers and sisters.Sincerely,Martin Melkonian

Alexis Melvin

i oppose the military buying native hawaiian land. it was illegally bought in the first place and the natives are given a literal $1 a year.
their queen was forced out and you took over to practice bombing on an ISLAND that you didn't even get permission to be on yall just came in and said "yeh this is mine now".
your bases have no right to remain there without even proper pay. your insulting them and sitting in your privilege all because generations of you troops overthrew a country of its own who didn't want to fight an unknown invader.if you want a place to bomb so bad create your own island (NOT STEAL ONE AGAIN BUT LITERALLY CREATE YOUR OWN ISLAND)
i'll never be able to comprehend people who put the land and it's people before the military. at this point y'all are just having fun doing it, training is needed but it's been literal years since a war was gonna break out. i'm sure y'all have practiced enough with weapons and know which ones work and don't.
you can't just bomb a country and expect it to regrow after your affected it so much. and i'm guessing when that happens you'll just ditch the country and expect islanders to clean up your mess or at least TRY TO.
honestly, check yourselves it's ridiculous.
Sent from my iPhone

Melanie Mendieta

Please give Land Back to the Native Hawaiians. That was their land before US colonialism robbed them of their sacred land.

Mariah Menor

The U.S army does not need to expand anymore on sacred land. The U.S has taken so much from Hawaii when they claimed it as there's and colonized it. As well as the land should not only be a dollar per acre, the U.S army has so much money that they are more then capable to afford the real prices this land holds. Keep this land sacred!

Veronica Messer

Hello!
I am emailing today to say that i oppose the military usage on the island of Oahu, and think that it should be given back to the people of the area.
Veronica Messer

Lola Mestas

Aloha. My name is Lola M and I am a resident of North Carolina. I am strongly opposed to the extension of military leases on the lands of Mākua, Kahuku, Wahiawā. An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals, and continually disrupt the lives of the local community. The Army has wrongfully leased the land from the state for $1 since 1964. When the lease expires in 2029, this land should be immediately restored to the public. Mahalo.

Jacob Metz-Lerman

Please leave Hawaii, the military occupation has done enough environmental damage. History will not look kindly upon your decision to stay. The world is literally on for fire, and we can no longer pretend decisions like this are uncovered unconnected.

Ellis Mewettsmith

Dear whomever it may concern, Which by the way should be all of us existing as the human race. I oppose you getting Hawaiian homestead land and furthering your occupation of the land all together and destroying it further. Ellis -- -Ellis (__/) (=' .'=) ( )3

Meleanna MEYER

"I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... Any renewal or re-leasing of these lands is not what the Natives want here in Hawai'i, for the following reasons: Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state's constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a "no action alternative" as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the "fair treatment of all people". Fair treatment means "no group of people should bear a disproportionate share of the negative environmental consequences". The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities. These military training lands are situated in communities that are majority

working-class, people of color, and Native Hawaiian. Kahuku, Waiʻanae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities. Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Waiʻanae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands. In the Ching vs. Case ruling, the court found the state to have a trust duty to "mālama ʻāina" and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using. These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through moʻolelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access. Environmental justice (EJ) as defined by the EPA requires "meaningful involvement" of impacted communities such that "decision makers will seek out and facilitate the involvement of those potentially affected." Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku. Our focus should be on malama ka ʻāina- Not war games and continued degradatio n of the earth,

Joe Meyers

Hi, my name is Joe Myers and I'm a resident of Oregon. I'm just going to say I'm strongly opposed to the attention of the military leases. An extension of the leases will allow the military to further damage the natural resources of the area, destroy the natural habitats of Native Hawaiian plants and animals, and continually disrupt the lives of the local community. The army has wrongfully leased these lands from the state for a dollar since 1964. When the lease expires in 2029, this land should be immediately restored to the public. Thanks.

Erick Michaelson

Hawaiian land belongs to Hawaiian people. The US military occupation of Oahu is bad for the island ecology and pollutes land that is sacred and ancestral.

Rae Michelle

I oppose the U.S. military training and taking up space on the island of Oahu, this land was unrightfully taken away from locals by the U.S. military and Native Hawaiians deserve their land back. Bomb testing not only effects natives livelihood but also is destroying their beloved land. Please rightfully return the land to Native Hawaiians, rehabilitate the environment, and move military bases elsewhere without colonization.

Andie Miller

Hello,
My name is Andie Miller and I strongly oppose the extension of the military leases of Mākua, Kahuku, and Wahiawā to the US Army. An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of native species, and continue to disrupt the lives of the local community.
The army has wrongfully leased these lands for $1 a year since 1964. When the leases expire, these lands should be immediately returned to the native people.
Thank you,Andie Miller

Mari Miller

The lease should not be renewed. The US military emits more carbon than most countries on the planet. As an island, Hawaii is especially at risk for climate disasters. By returning the land to Native Hawaiians, we can reduce the harm that every single person on this planet will experience as climate disasters ramp up.

Lyn Milo

The occupation of Hawaiian land by the US military is resulting in desecration of the native Hawaiian's home. I urge you to NOT renew your lease and let the land be tended to by the people who live there and not outside military forces.

Sophia Milone

One of the biggest polluters on earth— the U.S. army— should not and can not be permitted to control, disturb, and harm any land in Hawai'i. Native Hawaiians should have full sovereignty on whether or not U.S. systems are managed and built on their islands. The U.S. military will create environmental destruction despite following any environmental legislation or ordinances; development is harm, imperialism is harm, war is harm.

Colleen Minarich

What is happening is wrong. The land occupied by the military should go back to Hawaiian natives.

Madison Minjarez

Aloha, My name is Madison and I'm a resident of Texas. I am strongly opposed to the extensions of military leases on the islands of Mākua, Kahuku, and Wahiawā. An extension of the leases will allow the military to do further damage to the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals, and continue to disrupt the lives of the local communities. The Army/All Military forces have wrongfully leased these lands from the state for a $1 since 1964. When the lease expired in 2029, the land should immediately be restored and gifted back to the public.

Yuri Miyabara-Treschuk

Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a “no action alternative” as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the “fair treatment of all people”. Fair treatment means “no group of people should bear a disproportionate share of the negative environmental consequences”. The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities. These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai‘anae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from

industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities. Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Waiʻanae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands. In the Ching vs. Case ruling, the court found the state to have a trust duty to "mālama ʻāina" and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using. These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through moʻolelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access. Environmental justice (EJ) as defined by the EPA requires "meaningful involvement" of impacted communities such that "decision makers will seek out and facilitate the involvement of those potentially affected." Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku.

Rita Miyamoto

I would like to submit the follow comments regarding the Army's upcoming Environmental Impact Statement, which proposes to retain up to 6,300 acres of land on Oʻahu for military training purposes. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawaiʻi, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawaiʻi has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawaiʻi courts have also acknowledged the state's constitutional duty to mālama ʻāina. The leasing of ʻāina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ʻāina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on Oʻahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a "no action alternative" as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Waiʻanae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. In the Ching vs. Case ruling, the court found the state to have a trust duty to "mālama ʻāina" and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using.

Mitchell Molloy

Please stop the occupation of Oahu and give the land back to indigenous people. We need clean water, oceans and land. And we don't need a military base there. Almost everyone who knows what's going on doesn't want you there.

john Momenty

Aloha
My name is John and I am a resident living here. I am strongly opposed to the extension of military leases on the lands of Mākua, Kahuku, Wahiawā.

Mariana Monasi

I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... The state is supposed to take care of the land, Kanaka maoli and the natural resources on this occupied land. There is constant budget strains for OHA/DHHL, while a great percentage of native Hawaiians experience homelessness on their own land, while the US military pays $1 for a 65 year lease to abuse the land, deplete resources, perpetuate colonialism, patriarchy, colonialism and continues displacing Hawaiians. Stop bombing, stop leaking chemicals into our water, stop displacing people. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good.

These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts.

The EIS process currently considers a “no action alternative” as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored.

Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the “fair treatment of all people”. Fair treatment means “no group of people should bear a disproportionate share of the negative environmental consequences”. The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world.

These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality

acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. In 1997, the CEQ produced a guide titled "Considering Cumulative Effects Under the National Environmental Policy Act" which provides a framework for advancing environmental impact analysis by addressing cumulative effects in either an environmental assessment (EA) or an environmental impact statement. The EIS should employ this framework in order to address the cumulative effects of all related military activities, not just the proposed project.

US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai'i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai'i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities. These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai'anae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities.

Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Wai'anae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands.

In the Ching vs. Case ruling, the court found the state to have a trust duty to "mālama 'āina" and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using.

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should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access.

Environmental justice (EJ) as defined by the EPA requires “meaningful involvement” of impacted communities such that “decision makers will seek out and facilitate the involvement of those potentially affected.” Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku.

Shirlena Monroe

Hawaii has a long and terrible history of colonization. Despite this, many indigenous people remain and should have reparations made for the centuries of brutal treatment. The military is on land that should be given back to Hawaii. They should not be allowed to lease it any longer.

Laurie Moore

As an organization working with military families, I support the ability of the Army and all other services including our state's National Guard and the US Marine Corps to train on both Oahu and Pohakaloa Training Area. We have all seen how important the US Military presence is to Hawaii's economy and understand the environmental impact statement and community engagement with all parties is vital to military readiness, as these training areas are key for supporting any military actions in Indo-Pacific.

Nadine Morris

As a US citizen, I think we should give the native Hawaiian people back their land.

Abigail Mountz

Aloha, I am a resident of North Carolina and I am strongly opposed to the renewal of this lease and request the removal of military presence in Oahu. Thank you.

Summer Kaimalia Mullens Ibrahim

Okay. Aloha 'aina. My nameis Summer Kaimalia Mullens Ibrahim. I am a linealdescendant of James Kaiamahelanihi of Makua.I am exhausted by this process. It takesso much out of me each time that I -- each time Istruggle to bring myself to the point of commenting.And worse, we all know that this is just to checkoff the military's to-do list. And we've been sayingthe same thing for decades. Clean up, and pack out. I'm here to reiterate the same thingtonight. Are military missions truly more importantthan the lands and peoples that are affected by boththe training and the actual aggressions that havebeen implemented globally, leaving behindgenerations affected by birth defects from depleteduranium, communities without clean water or landwhich they can produce food on? Does the militarytruly care about their impacts? For six decades, you've been training inMakua, causing destruction, not only environmentalbut cultural. Separating us from the lands of ourancestors is a form of genocide, cutting us at theroot, leaving generations of displaced people. Formuch longer than six decades, 'ohana have beenseparated from our iwi kupuna and 'aina that's fedus for generations. I can't even begin to describe the mentaland emotional impact of seeing these lands of myancestors from behind the barbed wire fence. And, yes, we've been given access to this 'aina, butaccess is not enough to heal the wounds that havebeen left, the years of separation from iwi kupunaand from the 'aina of our ancestors. Our survival depends upon the life of ourland, and the life of the land is perpetuated by Ea,our sovereignty. Each time I think of access, Iremember when I brought my 'ohana to a Makua accessto revisit the 'aina of our kupuna, and whilewaiting to enter, standing outside the barbed wirefence, a young Army soldier is pacing inside, stops,and makes a hand motion as if he's shooting us witha machine gun. This is the greeting we are given by theoccupier as we stand outside the lands of ourancestors, the lands they were displaced from. Andnow I hear the Army has photos of our 'ohana inMakua on display while they continue to desecrateand rattle their bones and propose to continue touse this 'aina for their training. The military promotes itself to be a goodsteward of the lands they train on. They use ourlanguage on their signs. They throw terms around like malama 'aina. But I'm not fooled. I've seen the desecration of Hale'au'au and walked the 'aina wherethe iwi kupuna were uprooted by bulldozers. I've seen with my own eyes the pollutionof natural springs and the destruction of culturalsites in Makua and have walked the areas of Mokapuwhere iwi kupuna were desecrated and later found infoundations of base housing. I've walked the lands of Pohakuloa filledwith unexploded ordinance, seen the environmentaland cultural impacts of our food basket at Pu'uloa.We hear the leaking -- we hear about the leakingmilitary field tanks at Red Hill affecting ourprecious water resources.... Okay. In the next phase, Iwant the Army to look at how COLA impacts the rentalmarket and displaces local and kanaka maoli, who getpriced out of their homeland. I want them to lookinto how many servicemembers use their COLA topurchase homes in the islands and how that impactsthe housing market and homelessness of kanaka maoli. I want you to look into crime connected to servicemembers in communities near U.S. militarybases around the world, including rape, murder,violence, child sex trafficking, et cetera. I wantyou to look at how your servicemembers affect areasoutside of training areas, with pallet fires, off-roading, massive beach parties. Just to be clear, I fully support the noaction alternative stressing that the militaryabsolutely needs to be held responsible for cleaningup our waiwai, our 'aina, wai and pae that have beenaffected by their training throughout years ofabuse. Mahalo for hearing me.

Linda Muralidharan

Hello, my name is Linda Muralidharan, and I live on Oahu. I want to endorse essentially all of what colonel Ann Wright shed about the 65 year leases of 30,000 acres of Hawaii state land by the US military as it is expected to end these leases in 2029, they should die at that point. Colonel Wright and I have operated and as certainly as a volunteer and she often as a volunteer in parallel organizations that have studied the war of the wars that the United States has participated in, in the last few decades, and I agree with her that they are not the way to solve problems and of course we all know, or at least many people know that they have specifically been lossed failures Vietnam. Iraq. Afghanistan, particularly. So it is foolish to keep on putting money into a losing proposition. Secondly, in the future, we probably will have more cyber warfare. And more artificial intelligence and will not need so much of this armature and people or personnel on the ground. So at some point in time, Hawaii is going to suffer great economic loss when the military begins to reduce its actual presence here in Hawaii. We need not be depending on one or two major sources of income or we will become like the rust belt cities. On the mainland, where they depended on one or two industries which eventually died. We need to protect Hawaii, both the lands from foolish use and our economy. By moving away into more diverse ways of raising tax dollars. So these leases ought not to be extended and I think that we do need to look into what happens when we depend too much. Well, the pandemic gave us some lessons. Perfect. Perhaps that needs studying what's happened when the tourist industry died for a period of time. We can't know in the future if it's going to die permanently. We can't know if the military is going to withdraw a major portion of what it expends in Hawaii. So let's start by not renewing these leases, it will protect human life, it will protect Hawaii's economy. And it will make sense for the United States of America to look like we know what we're doing. Thank you so much for listening to my comment. If anybody finds the need to contact me. I have a local number XXX-XXXX again my name is Linda Muralidharan, I reside in Aiea in the island of Oahu. Thank you.

Kelsey Murphy

I support returning all military occupied land back to Native Hawaiians.

Zack Murphy

Aloha. My name is Zack Murphy, and I would like to call in objection to the military using our public lands as their training centers. I grew up in Pupukea and I went to high school Kahuku high school and I have hunted the grounds that a military occupies in our mountains. And throughout their training camps they have in the mountains, they kick us out when we're hunting, they leave their rubbish. They leave live rounds of ammunition, they leave MREs not open, they leave countless ammo boxes in our forest along with any runoff that they leave behind from their massive trucks or their refueling or their breakdowns. They leave it all in our mountains and kick us out while we were trying to hunt. All night long, they fire their 50-cal guns and I can hear it from my home in Pupukea all night long. They fly their military helicopters closer than comfort above my home, shaking our house, and it goes on all night long with no Respect for the residences that live here or have any type of comfort going closer to the homes than they need to be. They have zero respect for the land, zero respect for the people, and they abuse the privilege, they have taken from the Hawaiian people and the residents of Hawaii. Under an unlawful occupation of US military on our island, and I would like for them to pull back. To train in America because they have no right to train here bomb our islands, shoot their guns out our forests, kill our natural animals. Which I know they shoot deer and pigs out of helicopters, because I have friends with licenses that partake in these actions. And know a lot of military who tell me that they shoot the animals out of helicopters and they do nothing to clean them up. The animals are left to waste. There's no respect for the animals. There's no respect for the land and things need to change. For the betterment of our people. Aloha.

Dariq Murray

I don't understand why the government needs to be bombing sacred Hawaiian lands.

Monica Musgrave

This land needs to be returned to Hawaii. A military presence is unnecessary and unwanted, and it's absolutely ridiculous that it is in possession of the government currently, much less in 8 years and beyond.

Sophia Muus

The re-leasing of this land to the military is directly against the wishes of the Hawaiian people and is a passive form of oppression. The military leases on these lands expire in 2029 and should end there. This has gone on long enough.

Ash N

Hello,I am contacting you as a concerned community member to demand that the US military end their unlawful occupation of 6,300 acres of land on O'ahu used for training. Do not negotiate new leases. The people of Hawai'i have been displaced by Army presence since the very beginning. Allow it to expire in 2029, or cancel it now.Thanks,A

Brian K Naeole

As a Lineal descendent as a pure kanaka mōʻali its my Right to protect what's Legally and Rightfully to save this History and this part of the world FOREVER. It's so shocking to read history to see how the KINGDOM OF HAWAI'I Was stolen ?
A very good example the January 6 2021 insurgent
Perfect example of who to trust and who not to trust. Back to the lease lands in Hawaii. In this part of the world who is still the Real owner. ROYAL ALLODAIL TITLE LAND PATIENT TO HAVE AND TO HOLD FOREVER. LAND COMMISSION AWARD. It's my Birth right to do what right to save my finding fathers who gave us the knowledge to stand and to make sure that this doesn't happen to any other Nations in the world because education takes us there. Who gave you the right of $1 a year
The whole situation of the problem is the military as a bully they need to admit that they did WRONG.
I want to end with this this is catastrophic putting human lives in DANGER.

Nathan Nahina

"Aloha. This is Nathan Nahina, a resident of Wahiawa. I am against the leasing for military lands especially in Kawailoa and Poamoho area. I experienced in my lifetime, getting denied access to the rivers and streams of the area when I was trying to teach my kids and get in touch with get in touch with the aina and getting in touch with the land. Showing them how to fish, how to gather, just enjoying and feeling free amongst all this craziness. But getting denied to that that spot which is so special to us and our family of this place. I don't, I'm all against the so Let's, let's look at how all of these lands can be used to possibly farm, teach the kids whats actually more important, taking care of this place is not money is not power. Give back to the community and just Be good. Take care of this place so that the our kids that their kids and their kids generations have something to live for. "

Megumi Nakama

Aloha. My name is Megumi Nakama, I am a resident of Chicago, Illinois. I am strongly opposed to the extension of military leases on the lands of Makua, Kahuku, Wahiawa. Extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals, and continue to disrupt the lives of the local community. The army has wrongfully leased these lands from the states for one dollars and 1964. When the leases expire in 2029, this land should be immediately restored to the public.

Bruce Nakano

Hi Represenitive Perruso, i have read your article about the military leasing our state lands. Currently i believe kalaeloa is a lot of land that could be used for other productive things, the military has all beautiful hawaiian lands on our coastline. My safety concern is that their helicopters flying low over homes when it is not nessasary. I live in royal kunia and there are flying daily, all it takes is one accident into homes. With the recent air accidents i would think its just a matter of time. They are suppose to fly over agriculture land, golf courses, forrest, and highways. With the routes that they currently take from kalaeloa to campsmith and kaneohe flying over homes are avoidable. They also fly so low that your house vibrates and rattles, you cannot even have a conversation or hear your television . Please assist us in this issue. I contacted Captain Branch army he tries to assist. Marines, and the faa but no help. Joint base pearl harbor and hickam must have a dummy phone that no one answers.
Aloha Bruce Nakano

Karen Nakasone

Aloha mai kākou,
I am writing to urge you to release Makua back to the people of Hawai‘i.
I had the privilege of visiting the valley once and was struck by the mana the valley exudes, the important archaeological sites, and at the same time, heartache that the valley is being abused. There is a very special relationship that Hawaiians have to ‘āina that the military does not understand, therefore, cannot interact and care for this place in the way that it deserves.
Please do not renew the lease.
Ke aloha nui,Karen Nakasone

Makana Nalehua

I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... kanaka maoli and kama'aina deserve affordable housing and the preservation of ancestral lands. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good.

US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities.

These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai‘anae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities.

Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Wai‘anae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands.

These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through mo‘olelo to registered cultural and

historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access.

Brittany Namauu

Aloha, my name is Brittany Namauu Im a resident of Utah. I strongly oppose the extension of military leases on the lands of Mākua, Kahuku, and Wahaiwa.
An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of native hawaiian plants and animals, and continually disrupt the lives of the local community.
The army has wrongfully leased these lands from the state for 1$ since 1964. When the lease expires in 2029, this land should immediately be restored to the public.

Charla Naone

Okay. Aloha mai kakou. O Charla Leiali'i Naone kou inoa. I am from Nanakuli, Oahu. I am a Native Hawaiian daughter and mother. I spent many days of my childhood and my life pretty much on the sands just fronting Makua, and I always dreamt of a day when our valley could be free.

I strongly oppose the continuation of the lease of Hawaiian lands by the U.S. military. You see, in our culture, we place extreme value in our families and our 'aina. They are one and the same.

I understand that this hearing is in regards to an EIS, but we all know the truth, that your plan is to just, you know, throw some papers together and move on with it and continue bombing of our lands. But I just want to make it clear that you have many of us that are in strong opposition to the extension of really any of these leases.

The U.S. has shown time and time again that they do not take care of not just Hawai'i, but any land that they're on, whether it's Okinawa, Philippines. I mean, look at the Middle East. We're withdrawing from the Middle East, and their land and their people, the land and the people are always damaged.

And furthermore, you know, the military on Oahu and in Hawai'i has taken the most beautiful parts of us. And it's just the damaging. We can't take it anymore. It's not just the land and the people. It's our culture, and it's who we are. It's time for the military to move on. It's time for our 'aina to return to us.

Yes, it'll take decades. Even if you clean it, it's still going to take decades for this land to heal. But enough is enough. Mahalo.

Jarika Naputo

"I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... these lands belong to Native Hawaiians. I would like to submit the follow comments regarding the Army's upcoming Environmental Impact Statement, which proposes to retain up to 6,300 acres of land on Oʻahu for military training purposes. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawaiʻi, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawaiʻi has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawaiʻi courts have also acknowledged the state's constitutional duty to mālama ʻāina. The leasing of ʻāina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ʻāina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on Oʻahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a "no action alternative" as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Waiʻanae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ʻāina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the "fair treatment of all people". Fair treatment means "no group of people should bear a disproportionate share of the negative environmental consequences". The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ʻāina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawaiʻi: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawaiʻi residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these

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Courtney Nelson

Please leave Hawai'i. Hawaiian natives deserve the land you occupy. This is a huge issue! Did you know that President Grover Cleveland acknowledged that the Hawaiian Kingdom was unlawfully invaded by United States marines on January 16, 1893, which led to an illegal overthrow of the Hawaiian government the following day. Hawaiian land was never meant to be occupied by U.S. military. Give the land back to the native people!

Luke Nemy

Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a “no action alternative” as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the “fair treatment of all people”. Fair treatment means “no group of people should bear a disproportionate share of the negative environmental consequences”. The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities. These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai‘anae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from

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Spencer Ng

DO NOT LET THEM RENEW THE LEASE, REMOVE THE MILITARY, GIVE THE LAND BACK TO PEOPLE WHO WILL TAKE CARE OF IT FOR THE BETTERMENT OF THE ECOSYSTEM AND NATIVE POPULATION.

The military has shown over and over again that they do not have any regard for the land and its management. This is true in Hawaii, the continental US, as well as other countries/islands that the US has taken.
The history of forceful occupation and absolute disrespect for native peoples proves the intentions of the military are not to protect the people, but rather they stand to cut down and obliterate any attempt at reclaiming what has been wrongly taken.
As an organization, the US military does not care, has not cared, and will likely never care about the thoughts, opinions or welfare of anyone except themselves.

Date: August 24, 2021

Re: Opposition to O‘ahu Army Training Land Retention

As a resident of O‘ahu all my life, I constantly see the impact the military has on the 'āina and the Native Hawaiian people. It is discouraging to see that Native Hawaiians and Pacific Islanders make up the near majority of persons experiencing overcrowding or homelessness in Hawai'i.[1] Meanwhile, the majority of the military personnel I have interacted with are residing in desirable single-family homes. The U.S. government has had a long history with the islands, with constant talk about repairing relationships with the Native Hawaiian people—the Hawaiian Homes Commission Act was one way. But as plain to see, there is currently not enough land “available” to carry out this act in good faith. Should the Army continue to hold onto the proposed 6,300 acres of land, the ability to provide the Native Hawaiian people with their promised land provisions will be far from adequate.

Even if the proposed lands for retention will not be rezoned as housing for Native Hawaiians, the areas where the Army seeks to continue their lease are significant in the Native Hawaiian culture. Specifically, cultural practitioners consider the Makua Valley as the birthplace of humans.[2] It is vital to note that this is not the first instance in which non-Native actions have intruded on cultural beliefs and values; the TMT continues to push ahead despite the thousands of Native Hawaiians who have protested against it. Should we continue to ignore the voices of thousands of Natives Hawaiian people, we are only moving further away from the goal of reconciliation.

Perhaps what is most affronting is that up until 2029, the land that Native Hawaiians consider sacred has essentially no monetary value—considering the Army paid just a single dollar for their dominant usage. The terms of the proposed continued lease will most likely be different but, the Army has still yet to make good with the Native Hawaiian families (and other O‘ahu residents) forced out of the areas after World War II. While countless persistent disputes contribute to the discord between the Native Hawaiian people and the military, this issue is resolvable by returning the lands.

Ultimately, Army training will not stop whether or not they have control over these state-owned lands. The Army still holds onto 12,000 acres of U.S. government-owned areas to continue to run drills, aviation training, etc.[3] Returning the 6,300 acres of land is a necessary first step for the Army to address the historical injustices imposed onto the Native Hawaiian people and foster an

[1] https://www.huduser.gov/portal/pdredge/pdr-edge-research-072417.html

[2] https://www.civilbeat.org/2021/08/a-shaky-truce-the-army-and-native-hawaiians-both-want-oahus-makua-valley/

[3] https://home.army.mil/hawaii/application/files/5716/2691/2876/OahuEIS_Posters-210720.pdf

amicable relationship the U.S. government has been vocal about having. I am in **strong opposition** to the proposed O‘ahu Army Training Land Retention.

Haley Nichols

Aloha, my name is Haley from Nashville, Tennessee. I am strongly opposed to the extension of military leases on the lands of Mākua, Kahuka, and Wahiawā.

An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of native Hawaiian plants and animals, and continually disrupt the lives of the local community.

The Army has wrongfully leased these lands from the state for $1 since 1964. When the lease expires in 2029, this land should be immediately restored to the public.

Thank you for your time.

Margaux Nielsen

Hi, My name is Margaux Nielsen, and I am a resident of Los Angeles, California. I am strongly opposed to the extension of military leases on the lands of Mākua, Kahuku, and Wahiawā. An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals, and continually disrupt the livers of the localy community. The army has wrongfully leased these lands from the state for $1 since 1964. When the leases expire in 2029, this land should be immediately restored to the public. I visited the islands this summer, and it was painful to see the impact of the military and colonialism on the local community. I hope we as Americans can recognize the wrong of our occupation of Hawaiian land and take steps towards positive peace. Thank you,Margaux

[redacted]

Natalie Nimmer

This island is already crowded with an out-sized military footprint. The land could be repurposed for a use more aligned with Hawaiian values. Please consider the big picture of how these land resources can best serve the population on this small Pacific Island. Training can be done elsewhere.

Jacob Noa

I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... the continued occupation of these lands for military trainings and activities is detrimental to the land, our natural resources, sacred sites of historical and cultural significance, in addition to the health and well-being of adjacent communities.
Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good.
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over time. In 1997, the CEQ produced a guide titled "Considering Cumulative Effects Under the National Environmental Policy Act" which provides a framework for advancing environmental impact analysis by addressing cumulative effects in either an environmental assessment (EA) or an environmental impact statement. The EIS should employ this framework in order to address the cumulative effects of all related military activities, not just the proposed project.

US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities.

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As a resident of Oʻahu, I am constantly assailed by the sounds of gunfire from military training exercises and the loud roar of military aircraft flying directly overhead. This serves as a constant reminder of our homelands being treated as a glorified military base, with no thought to the effect on the land or the people who live here. If the Army claims any sort of concern or duty toward the people of the land which it occupies, it must begin the process of scaling back its military operations and begin returning these lands to the people.

Kalani Nozaki

I would like to submit the follow comments regarding the Army's upcoming Environmental Impact Statement, which proposes to retain up to 6,300 acres of land on Oʻahu for military training purposes. These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Waiʻanae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawaiʻi: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawaiʻi residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities. Please add any personal comments here. Please the military trash the land and use it however they like with no respect to the locals or this place I call home!

Amy O

"I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... Hawaiian lands belong in Hawaiian hands. Military housing programs are already driving up the real estate market while 40,000 Hawaiians are dying on the Hawaiian Homes list. Everyone has to pay to play, especially in an illegally occupied state. I would like to submit the follow comments regarding the Army's upcoming Environmental Impact Statement, which proposes to retain up to 6,300 acres of land on Oʻahu for military training purposes. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawaiʻi, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawaiʻi has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawaiʻi courts have also acknowledged the state's constitutional duty to mālama ʻāina. The leasing of ʻāina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ʻāina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on Oʻahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a "no action alternative" as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Waiʻanae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ʻāina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the "fair treatment of all people". Fair treatment means "no group of people should bear a disproportionate share of the negative environmental consequences". The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ʻāina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawaiʻi: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawaiʻi residents suffer from psychological, physical, and

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Elizabeth Oakes

Iam writing to askthat you refuse to lease Hawaiian lands to tjeUS Army.

Shannon Lokelani Oberle

Aloha United States Military EIS Conferees,

With respect for your roles as community advocates, I urge STRONG OPPOSITION to extend military leases that degrade aquifers, important agricultural land and conservation land in the Hawaiian Kingdom, specifically in regards to the current Makua, Kahuku, Kawailoa, and Poamoho leases.

The crux of the matter is the United States military has already left behind detrimental military waste in our environment. There needs to be an extensive exit plan of these leases that includes a large financial backing and grit to implement clean up. The responsibility of cleaning should not reside with the Hawaiian people.

Furthermore, it is vital to protect soil quality and life-sustaining water sources. With appreciation to reconsider the proposed military radar facility and waste storage in Kahuku, the EIS should consider existing methodology that designates important agricultural land on Oahu. See City & County Resolution 18-233. Yield water flow to proposed Important Agricultural Land (AIL) on the North Shore of Oahu. The Kahuku lease site is too close to agricultural land, which has potential to feed our communities.

The people of urban Oahu need military waste clean up, too. The health and environmental risks associated with the existing leaky fuel storage located in Moanalua at Red Hill are very high.

Consider military expansion outside of the Hawaii Kingdom. It is our home.
We value our natural resources here. STRONGLY OPPOSE military lease extensions.

Me ke aloha,
Shannon Oberle

Isiuwa Oghagbon

The illegal occupation of Hawai'i is disgusting. US colonialism has ruined the land and lives on those beautiful islands. Hawai'i was illegally taken and needs to be returned to its rightful inhabitants.

Devin Oishi

Because the United State is occupying the Hawaiian Nation there is no way to extend what is an invalid lease. I think only Pearl Harbor's lease was negotiated with the Hawaiian government. However, that treaty was invalidated after the occupation of the Hawaiian islands was initiated. Since the US and its conspirators destroyed the Hawaiian Government and attempted cultural genocide, negations must be completed after the US recognizes the sovereignty of the Hawaiian people and the Kanaka Maoli to choose a government.

Andrea Olivas

The military is illegally occupying Hawaii. You are pushing Native Hawaiians out of their land and destroying their natural resources. Give the land back to indigenous people and stop military occupation in Hawaii. Y'all really are not needed anywhere ever so stop.

Shambrea Oliver

Hi, my name is Shambrea, I'm a resident of California. I'm strongly opposed to the extension of the military's leases on the lands Mākua, Kahuku, and Wahiawā. An extension of these leases would allow the military to cause further damage to the natural resources, habitats of the plants and animals in these areas. It would also further disrupt the lives of the local community. The military has wrongfully leases these lands since 1964 for only a $1. A dollar! When the lease expires the land should be given back to the public and the lands restored.

Zyreal Oliver-Chandler

Aloha,

My name is Zyreal Oliver-Chandler and I am a resident of
Tacoma, Washington. Iam strongly opposed to the
extension of military leases on the lands of
Mākua, Kahuku, Wahiawā. Although I am personally not a Hawaiian native, I am an ally with many Hawaiian close friends that would be impacted by this extension.
An extension of these leases will allow the
military to further damage the natural
resources of these areas, destroy the
natural habitats of Native Hawaiian plants
and animals, and continually disrupt the
lives of the local community.
The Army has wrongfully leased these lands
from the state for $1 since 1964. When the
leases expire in 2029, this land should be
immediately restored to the public.

Thank You for your consideration,
Zyreal

Willow Olson

I highly oppose the renewal of any and all permits/allowances continuing and allowing army training to further desecrate the island land, air, life forms and water with bombs and firearm ammunition as well as opposing the army presence/occupation of O'ahu furthering the displacement of indigenous people and their homeland from resources that they are native to.

Mr. & Mrs. John OlSzowka

8/11/2 [redacted]



I AGREE WITH AUTHOR ANN WRIGHT'S ARTICLE IN SUNDAY 8/8/2021 HONOLULU STAR-ADVERTISER PAGE E-3

EVEN IF YOU TAKE THE LAND BY ADVERSE POSSESSION - YOU MAKE NO FRIENDS AND EMBOLDEN OUR ENEMIES

PLEASE USE MORE CRITICAL THINKING ON THIS MATTER

BE FAIR -

John Olszowka

回音壁 回音壁 회음벽
The Echo Wall
Mur de l'Echo (Huiyinbi)
Die Echomauer
La Parete dell'Eco

VISITED HERE 2007 CULTURAL EXHANGE W/HI YOUTH OPERA CHOIR

OAHU ATLR EIS COMMENTS
P.O. BOX 3444
HONOLULU, HI
96801-3444

邮政编码
监制：北京邮政管理局

Lena Orlando

Aloha. I grew up on the island of Hawai'i and have family members in the military. I feel it is important to stop military training and maintain the land as natural open space. Open space as a natural resource is increasingly important as populations rise, sea levels rise, and climates change. Climate change is hitting island nations hardest. One tool in the kit is to maintain ecology of the land in order to create a natural system that can help reduce impacts of climate change. Open space can allow rainwater to percolate into aquifers and help reduce rising temperatures, etc. I am writing to encourage not to just stop military exercises, but also to remove possible pollutants left behind and to restore the area, while ensuring it remains in its entirety as open space. Restoration of this area (and as much open land as possible) is immensely and immediately necessary to increase natural resource sustainability.
Mahalo nui loa!

Catherine Orleans

"My name is Catherine Orleans. I'm a resident of Nanakuli O'ahu. I strongly opposed extension of these military leases on our native Hawaiian Lands. Any extensions will further allow the federal government to damage our natural resources and not mentioned that they haven't even DONE anything about the Red Hill fuel tank. So that that needs to be done first with your EIS before you even consider any type of extension on any type of client land. So no, no to any destroying of our natural habitat. No to destroying of land for future generations of native Hawaiians and no especially no for anytime at least $1 for more than a year. Hello. What is, what is the Imperial Military of the United States doing to people on their own land, like now you consider this your land, it should be here for thousands of years to come, that you're going to use it to be destroyed and practice destroying other people's land around the world. You just need to stop already, we need to go forward in peace. And we need to start with showing our land our peace. mahalo "

Preston Ornellas

Okay. Let me just thank you guys for taking the time out of your lives to do this, give us a platform to let you know how we truly feel.
My name is Preston Kamuela Ornellas from the island of Kauai, born and raised in Wailua. My grandfather was a veteran buried at Punchbowl Cemetery. My dad is a Marine, fought in Vietnam. I was raised by a military man.
I don't agree with renewing the leases, first of all, and I'm pretty sure you guys got the message clear. I just want to talk briefly on the history. And, you know, this is the Kingdom of Hawai'i. That's a true fact. Another fact is youguys have a nasty track record of not caring about the environment. Another historical fact is you are illegally occupying us right now.
Another historical fact is the people of this islands don't trust the military. There is no such word when it comes to the relationship between the kanaka maoli and the U.S. military. So that --that word is -- is really touchy. You should think twice about using that word, and you should really deeply think about the meaning of that word and thehistory of that word in this -- in this whole islands.
Another thing I want to point out about history is the threatened plants, the animals, all the species in here that is super threatened. And you got the history of the U.S. military. You guys never show no -- no aloha, no love to that.
And then the kanaka voice is another point I want to make. They're in total opposition of the presence of the U.S. military in the fake state of Hawai'i. The land of the free, the home of the brave -- this is the land of the free and the home of the brave.
And you guys need to -- you need to really open up your eyes and -- and wake up, because the future, unlike me, how I was raised with lies in an American history class, these -- these young youth coming out of Hawai'i today, they're being raised with the truth, so that they know it right out of the gate. You guys are illegally occupying Hawai'i.
Thank you for your time. I wish you guys all the best. And, Colonel, please, please open up your mind to everybody's -- I don't know the words, but the heart that they're coming with. Thank you very much. Aloha.

Kathryn ORourke

Aloha,
My name is Kathryn O'Rourke and I'm a resident of New York, NY, USA. I am strongly opposed to the extension of military leases on the lands of Mākua, Kahuku and Wahiawā.

An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals, and continually disrupt the lives of the local community.

The army has wrongfully leased these lands from the state for $1 since 1964. When the leases expire in 2029, this land should be immediately restored to the public. In light of our current CODE RED climate emergency, it would be ignorant and despicable not to.
Thank you,
Kathryn

Kiana Otsuka

"Aloha. My name is Kiana Otsuka and I am a Honolulu resident. I'm calling to let you folks know that I'm strongly opposed to the extension of the military leases for Makua, Kahuku and Waiawa. I believe that an extension of these leases will allow the military to further damage the natural resources of these areas, destroying natural habitats of Native Hawaiian plants and animals and continually disrupt the lives of the local communities in those areas. I'd like to ask that when the leases expire in 2029 that's the land should be immediately restored to the public. Thank you very much and have a good evening. Bye. "

Kiana Otsuka

Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. The EIS process currently considers a “no action alternative” as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai‘anae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities.

MICAH PACATANG

I do not support retention of the Kahuku, Kawailoa/Poamoho, and Makua training areas by the United States Army. The lands would be better suited for O'ahu's housing shortage and/or agriculture.

Lysandra Padeken

"I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... It is time for our crown lands to be returned to its rightful owners, the Native Hawaiians and general public. Enough with the military occupation of OUR lands. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a “no action alternative” as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the “fair treatment of all people”. Fair treatment means “no group of people should bear a disproportionate share of the negative environmental consequences”. The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities. These military training lands are situated in communities that are majority

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Megan Padua

The Army land lease should NOT be renewed.

Aleka Pahinui

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industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities. Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Waiʻanae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands. In the Ching vs. Case ruling, the court found the state to have a trust duty to "mālama ʻāina" and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using. These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through moʻolelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access. Environmental justice (EJ) as defined by the EPA requires "meaningful involvement" of impacted communities such that "decision makers will seek out and facilitate the involvement of those potentially affected." Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku.The noise & desecration is disturbing. Save our sins from the pollution.

Kathleen M. Pahinui

Aloha – At the North Shore Neighborhood Board these 2 issues come up consistently: Helicopter Noise – this has been a huge issue for the North Shore, Oahu community for well over 30 years. All attempts to work with the Army on mitigating this concern has fallen to the side and not one conversation / meeting has resulted in a solution. Ever. Claims of not flying over neighborhoods are not true. I live in the flight path and see the helicopters flying over my home. And the fears of an accident are very real – witness the tragic accident from several years ago. Traffic – traffic plans are sent to our board as part of training and maneuvers and they are seldom followed. Given the traffic woes we already face, having large miliary vehicles on the road adding to the mess is not sustainable. Our community should not be held hostage to unnecessary traffic. These need to be studied in the EIS and fixed permanently. Malama ʻāina, Kathleen M. PahinuiChair, North Shore Neighborhood Board #27

Koohan Paik-Mander

The 65-year leases of 30,000 acres of Hawai'i state land by the U.S. military are ending in 2029. The State of Hawai'i should not re-lease these lands no matter what the amount the U.S. military offers.

We are subjected to a daily dose of the U.S. military build-up for what the Indo-Pacific command is calling "our enemy China." We know what happens when the U.S. tries to resolve disputes through military action---millions of persons dead and wounded, including tens of thousands of U.S. military, as evidenced by the wars in Viet Nam, Afghanistan, Iraq and Syria. Ultimately disputes with countries are resolved not by military action, but by dialogue, so why are we spending trillions on weapons that ultimately to not solve the situation?

Our real enemy is our inability to address the climate catastrophe we have caused. Floods, fires, storms and mudslides are the enemy, not China. Redirect the $740 billion 2022 budget toward ecological restoration and diplomatic talks with China.

Koohan Paik-Mander

Aloha. My name is Koohan Paik-Mander. I am a resident of Hawai'i island. Ioppose the extension of these leases. This landbelongs to the kanaka maoli, the original people ofthese islands. This land is their bodies, theirblood, their bones, their genealogy. To conduct war exercises on this land is acrime against humanity and desecration. It is saidthat the best way to commit a crime is to make itlegal. That is what these lease extensions wouldachieve. I oppose the legalization, as it were, ofthese human rights crimes in the form of these leaseextensions.These lease extensions are to accommodatea military agenda focused on war with China. It'sjust one manini piece of the full-throttle plan totransform the vast Pacific ecosystems into ranges totrain for a global war. This perverse idea that World War III islikely has justified an $800 billion weapons budgetfor 2022 for missiles and weapons of massdestruction, all aimed at China. It is the ultimateexpression of anti-Asian hate. You have to be either a complete moron or totally brainwashed to think that our biggest threat is China. It's all too painfully clear that ourbiggest threat is not China. It's the climatecrisis. It is the biblical-scale floods sweepingaway medieval villages in Europe, and in the sameweek the floods in China washing hundreds of carsacross highways like so much flotsam and jetsam anddrowning subway commuters. It is the fires burning whole Californiatowns to the ground and the wildfires and greaseturning the islands into a suffocating hellscape. There is a wildfire in Siberia burning outof control right now that is larger than all theother wildfires in the world combined. In Siberia,the coldest place on the planet. Hundreds of acres of crops are witheringright now without water in California, the nation's breadbasket. And now the IPCC just stated just thisweek that we don't have a decade to save the planet,like they said in 2019. We've got 18 months.So, Pentagon, you've got 18 months and an$800 billion budget. What are you going to do? ThePentagon is the world's largest single emitter ofgreenhouse gases. The Pentagon emits more greenhousegases than the nation of Denmark, more than Sweden,more than Portugal.: And for what? To deployweapons of mass destruction and generate profits for the arms industry with endless military training like at Pohakuloa, like at Kahuku, like at Makua Valley. Climate cooperation with China, not war, isthe only path to a livable future. Stop the wargames. No extension of state leases to U.S.military. Thank you.

Kyle Paist

Aloha,
My name is Kyle Paist and I'm a resident of New Milford, Connecticut. I strongly oppose the extension of military leases on the lands of Mākua, Kahuku, and Wahiawā.
An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals, and continually disrupt the lives of the local community.
The Army has wrongfully leased these lands from the state for $1 since 1964. When the leases expire in 2029, the land should be immediately restored to the public.
Thank you.
Kyle Paist

Merle Pak

Testimony Opposed to the Renewal of Military LeasesSubmitted by Merle PakAugust 31, 2021
Aloha,My family has lived in Hawaii for five generations and consider these islands our home.I am a mother, a grandmother, a retiree from the health care industry here, and a daughter of a Korean War vet.
I am adamantly opposed to the continued use of Hawaiian lands for the purposes of the US military, in particular, I oppose the renewal of the military leases currently under review by the US Army.
The US military argues that they need the land to prepare because of a potential threat of attack by China, or North Korea, or Russia. They say that Hawaii is the ideal location for training in military war maneuvers. My position is that the more militarized the Hawaiian islands are, the more likely we become a target for these adversaries. We the people have no quarrel with the people of China, Russia, or North Korea. It is the history of US expansionism, competition for world resources, and global domination that puts us in this position today.
In addition, the US military has proven itself to be a poor steward of the land. Kahoolawe bombing has been stopped, but the island is still far from being cleaned up. Same with the valley of Waiahole, which was used to train for WWII. Same with the dumping of excess military equipment and weaponry off the Waianae coast, where remnants have washed ashore and endanger the health and welfare of the children there.
Please, no more destruction of Hawaiian land for military training, on Oahu, or anywhere else.No more leasing of Hawaiian land to the US military.
Mahalo,Merle PakKaneohe, Hawaii

Amy Palmer

I strongly oppose the extension of the military leases on the lands of native Hawaiian people. The Army has wrongfully leased these lands, stolen from the native population, for $1 since 1964. When the leases expire in 2029, this land should immediately be restored to the public. Extending these leases will further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals, and continue to disrupt the lives of the local community.

Jaidyn Pang

"Aloha. My name is Jade and paying and I'm a resident of Haleiwa. I am strongly opposed the extension of military leases on the land of Makua, Kahuku, and Wahiawa. An extension of these leases will allow the military further damage the natural resources of these areas, destroy the natural habitats of native plants, plants and animals, and continually disrupts the lives of the local community. The army has wrongfully least these lands from the state for $1 since 1964 when the laces expire and 2029 this land should be immediately restored to the public. Thank you. "

Magda Papaioannou

Aloha,I am a resident of Maryland and I strongly oppose the lease extension. Extensions of these leases will further damage than natural habitat and environment. Please do not extend this military lease.
Thank you

Magdalena Papaioannou[redacted]Caution-[redacted]

Jaquelyn Parker

I oppose the re-leasing of this land because the US military is harming the native environment and native peoples by occupying land that never belonged to them and only adds insult to injury by leasing it for $1. As someone who works in government, it saddens me that we continue to dishonor Hawaii by destroying their lands.

Kamaka Parker

To extend leases of state lands to parties the state are not obligated to serve and protect while not caring for the native Hawaiian people, whom they do have an obligation to serve, is ridiculous! Why are the leases of thousands of acres occupied by the military being given precedence over distributing leases to Native Hawaiian through the Hawaiian Homes Act of 1920. No lease should be renewed and these lands should be leased to the rightful descendants of this land. To continue this negligence should be illegal and Hawaiians deserve better. Stop these extended leases now!

Lee Parks

Do Not Extend $1 Lease on 23,000 acres of Hawai'i State Lands in Military Pōhakuloa Training Area.

The state of Hawaii should not re-lease these lands no matter what the amount the U.S. military offers. These lands were given away without the consent of the Hawai'ian people essentially for free, with the state charging only $1 for each parcel for 65 years!

Hawaiian's are subjected to a daily dose of the U.S. military build-up for what the Indo-Pacific command is calling "our enemy China." Yet disputes with countries are resolved not by military action, but by dialogue. It is insanity spending trillions on weapons that ultimately do not solve the situation.

Hawai'i's culture of peace and dialogue must be brought back using the Hawaiian technique of "ho'oponopono" — rather than the islands being used as a base for projecting the U.S. propensity for killing over diplomacy to reduce tensions with other countries.

REDUCE the U.S. military footprint in Hawaii by the State of Hawai'i and refuse to re-lease 30,000 acres currently used by the U.S. military.

Sincerely,
Lee Parks

Amy Parsons

"I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... Hawaiian land should be returned to Hawaii. It's that simple. If that is not yet a possibility, Hawaii should be paid market rate plus some for the acreage. The military has enough funds to make that happen. I would like to submit the follow comments regarding the Army's upcoming Environmental Impact Statement, which proposes to retain up to 6,300 acres of land on Oʻahu for military training purposes. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawaiʻi, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawaiʻi has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawaiʻi courts have also acknowledged the state's constitutional duty to mālama ʻāina. The leasing of ʻāina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ʻāina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Waiʻanae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands. In the Ching vs. Case ruling, the court found the state to have a trust duty to "mālama ʻāina" and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using. These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through moʻolelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should

address the integrity of these sites as well as the need for unrestricted cultural access.

Caleb Pascale

Over a century ago, the United States illegally stole Hawai'i and invaded its islands with the U.S. military.
Today, Hawai'ians are still opposing these illegal occupiers & protesting military leases on their sacred places.
Please protect Hawai'ians' lands from U.S. lease. This has gone on too long. We are demanding for these lands to be returned & restored back to Hawai'ians as well as to discontinue the abuse of Hawai'ian lands for colonizer military trainings.
Sincerely,
Caleb PascaleHe/him

Bruce Pascua

Let me start off by saying....Show me the "Treaty of Annexation" between america's government and the Hawaiian Kingdom and it's government.You may think so that the Hawaiian does not exist but it still does exist, in continuity. There can be no dialog pertaining to land leases or any other leases what so ever without said Treaty in hand.As you should know and sure you have talk about it and with me not having to go through the song and dance routine,that Hawaii is not and has never been part of america and its military has no rightful claim to any land what so ever and has no right to be here in the Hawaiian islands.For 128 years since the Illegal over throw of the government of the Hawaiian Kingdom by america,your country has played this Charade with the rest of the world.Stop hiding the Truth as to why america and its military is occupying the Hawaiian Islands.Lastly.Do not forget,you are in the Hawaiian Kingdom....not in america....

Healohaokawailani Pascua

Aloha,
O Healohaokawailani ko'u inoa. Noho nei au i Wahiawā. Hewa nui ka extension of military leases ma ka aina o Mākua a me o Kahuku a me o Wahiawā.
Aloha, I am Healohaokawailani. I am a resident of Wahiawā. I strongly opposed the extension of military leases on the lands of Mākua, Kahuku, and Wahiawā.
An extension of these leases will allow the military to further destroy the natural resources of this land. It will destroy natural habitats of endangered species of native animals and plants, all the while disrupting the locals that have lived here for many many years. The Army has wrongly leased these lands for $1 since 1964. When the lease expires in 2029, this land should immediately be restored to the public.
It is really frustrating to hear the practicing of fire arms in the late evenings. I live near one of the many training areas for firearms, not too far from the water tower in Wahiawā. The loud booms and shootings really stir up the neighborhoods in the evening.
This is my opposition letter to the extension of military leases on the lands of Mākua, Kahuku, and Wahiawā.
Mahalo,
Healohaokawailani Pascua

Minerva Patino

I would like to share my concern with the US military renewing their lease on Hawaii.The land should be going back to the people of Hawaii not the US military, destroying the land, species living there, and any other significance that it holds for only a dollar, it's absolutely absurd. All of the land that the US military has for destruction and only for a dollar? It's unbelievable and very upsetting, but it is happening and I believe something should be done about it . Raising the price of the lease would not make what the military is doing anymore justifiable or moral The land should be given back to the people of Hawaii.
Thank you

Minerva Patino

I would like to share my concerns with the U.S Military renewing their lease on the land in Hawaii. The land should be given back to the people of Hawaii,not the U.S Military. Destroying the land, the species living there,and any other significance that it holds for only a dollar is absolutely absurd. All of the land the the U.S Military has for destruction and only for a dollar? Its unbelievable and Extremely upsetting I wouldn't believe it was happening if i didn't read it with my own two eyes.Raising the Prices of the Lease would not make the Military being on the land anymore justifiable or moral, The land should be given back to the people and species of Hawaii,instead of being used the way it is.

Michaela Patton

Hello, My name is Michaela Patton and I am a US citizen residing in Washington. I am writing to urge you to cease military occupation on the island of Oahu as their presence is killing the beautiful land. Indigenous leaders are locals alike are begging you. Pack up and move out now. Thank you,Michaela

Ashalie Pawe

Aloha, My name is Ashalie and I'm a resident of Hawaii. I am strongly opposed to the extension of military leases on the lands of Mākua, Kahuku, Wahiawā.
An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plant and animals, and continually disrupt the lives of the local community.
The army has wrongfully leased these lands from the state for $1 since 1964. When the leases expire in 2029, this land should be immediately restored to the public.

Jessica Payton

My name is Jessica and i am a resident of California. I am strongly opposed to the extension of military leases on the lands of Mākua, Kayley, Wahiawā. The army has wrongfully leased these lands from the state for $1.00 since 1964. When the lease expires in 2029, this land should be immediately restored to public.

Katherine Peck

Aloha,

My name is Katey Peck. As a military spouse, I was fortunate enough to live in Hawai'i for three years and attend the University of Hawai'i at Mānoa. While I am no longer living on O'ahu, I remain connected to many people and places there.

The reconsideration of leases at Kahuku, Kawailoa-Poamoho, and Mākua provides an incredible occasion to reset relations between the U.S. Army and Hawai'i. By demilitarizing and returning stewardship of 'āina (land) back to kānaka maoli (Native Hawaiians), the U.S. Army will be acting in a way is truly pono (good, upright, moral) and respectful toward its host lands and communities.

As a military spouse and a white American, calls for demilitarization and reclamation of land by Native peoples have felt overwhelming to me. I've been led to question many things I understood as truth, and it has taken a lot of learning, reflection, conversation, and action to imagine ways of doing things differently. I don't have all the answers, but I can recognize that there are many wrongs the U.S. Army (among many other institutions) needs to right, and that ignoring things won't make them easier to deal with in the future.

I anticipate that from the perspective of the U.S. Army, there are many compelling reasons to retain control over these lands. But I hope this process will prioritize the voices of those who descend from the stewards of this place, whose ancestors agitated against the illegal overthrow and continued occupation of Hawai'i and birthed a genealogy of activism that lives to this day. There is also precedent for demilitarization of lands in Hawai‘i and on O‘ahu specifically, which I hope can be used to encourage and guide this process.

Mahalo nui for your consideration and thought.

E mālama pono,
Katey Peck

Lee Peele

Place should go back to the people. Heritage sites should be reconstructed/rebuilt and locals/natives should be able to have access with safety. How much land is taken by the state/government/military as is and is off limits? Go Florida and train. Close enough to the environment your looking for if you want to train.

Kemmer Peeples

RETURN THE LAND AND RESTORE ALL THAT WAS TAKEN FROM NATIVES WHEN YOU BRUTALLY MURDERED THEM!!!

Moananui Peleiholani-Blankenfeld

Aloha! I am Moana Peleiholani-Blankenfeld, from Kalapana, Hawai‘i, and a student at the William S. Richardson School of Law. I oppose the renewal of any military leases in Hawai‘i and support the “No Action Alternative,” for Kahuku, Poamoho, and Mākua military training sites. As a Native Hawaiian, our land is the key to understanding who we are as a people. We have a deep, spiritual connection with the land. When our land is hurting, so are we. Although I am not from these places (Kahuku, Poamoho, and Mākua), there is a history of generational trauma due to military occupation within our islands. It is my kuleana to be a voice for these places and the people that are of these places as well. I ask you to highly consider the “No Action Alternative” for these reasons:The land has already been through enough hurt by the live fire training. These training sessions do not benefit our islands and people and pollute our land.There is a need for more affordable public housing that these lands could be used for. On O‘ahu, 51% of the people facing homelessness are Native Hawaiian/Pacific Islander. Returning these lands would open up an opportunity to provide homes for these people. In addition to the “No Action Alternative,” the military should also plan to clean and restore the lands that they are currently using of all military equipment. By taking the “No Action Alternative,” you will provide an opportunity to heal these places and let the people return to these lands. You will be able to start the healing process for many Native Hawaiian families who have been displaced from these places for many generations. Instead of insisting on the current path of retaining these lands, switch gears and genuinely engage the community on a clean-up plan that sets us on a path to return these lands to those who love them. This return of ‘āina is long overdue. The time is now to give the #landback. Should you have any questions, please contact me at: XXXXXXX Mahalo,Moana

Brittny Kulanui Perez

I oppose any lease extensions for the US military. 1)If you are unable to produce a treaty of annexation no extension should be granted 2) if you are unable to produce a joint resolution that is internationally recognized no extension should be granted. 3) a cession of lands where the parties whos land was Ceded was compensated 4) if all documents are not produced then that is automatic addmittance of (a)illegal occupation and (b)an act of war against the Kingdom of Hawai‘i and its subjects (c) the true laws of the land is still that of the kingdom of Hawai‘i and shall hence forth be enforced and the Kingdom restored and all military occupked lands be immedialty de-occupied with restoration plans and budgets proposed and paid for by the United states of America.

Brittny Perez

Seeing as the public forum and the number to post my testimony Both did not Work properly i will be posting it below instead. I Brittny Kulanui Kapuleokapiolani Naliipoaimoku Perez oppose any lease extension for the military on the basis of these conditions: I oppose any lease extensions for the US military. 1)If you are unable to produce a treaty of annexation no extension should be granted 2) if you are unable to produce a joint resolution that is internationally recognized no extension should be granted. 3) a cession of lands where the parties whos land was Ceded was compensated 4) if all documents are not produced then that is automatic addmittance of (a)illegal occupation and (b)an act of war against the Kingdom of Hawai‘i and its subjects (c) the true laws of the land is still that of the kingdom of Hawai‘i and shall hence forth be enforced and the Kingdom restored and all military occupked lands be immedialty de-occupied with restoration plans and budgets proposed and paid for by the United states of America.

Kristen Perreira

GET OFF OUR LAND

Elaina Perry

This land does not, and should not be occupied by the US army. This is native land and it is due time that the US army gives the land back to its rightful inhabitants, the Hawaiian people. It is wrong that the army only paid $1 to lease this land and the lease should not be renewed. It is time for land back.

Johnnie-Mae Perry

Contract W9128A-19-D-0008

To All:

Meeting at Leilehua Golf Course on Aug. 9 & 10 OR 10 & 11, 2021 from 6-9 p.m.?
Which date?

Table: 7-1 Consulted Parties
Community Institutions & Organizations

Missing from the list is
Malama Makua
Hui Malama

Why are they not consulted? The Army is very familiar with these group, long relationships with them going back in the early 1970-1980s.

Sincerely,

Johnnie-Mae L. Perry
Resident of Waianae

Johnnie-Mae Perry

Contract: W9128A-19-D-0008

Dear All:

Announcement of the above should be advertiser in the Westside Stores, call 808-696-7978 for more information, asap. This is the Waianae Coast Community monthly newspaper which is distributed to all that reside in 96792.

Thank you for immediate consideration.

Johnnie-Mae L. Perry
Waianae Resident

Johnnie-Mae Perry

See attachment.
Thank you,
Johnnie-Mae L. PerryResident of WaianaeWCNB #24 member

August 20, 2021

RE: Army Training Land Retention on State Lands on O'ahu (EIS Preparation Notice)

To whom it may concern:

I, Johnnie-Mae L. Perry resident of Waianae and member of the Waianae Coast Neighborhood Board #24 **support 2.3.4 No Action Alternative for Makua Military Reservation.** See Exhibits 1-1 and 2-12.

Email: [redacted]

INTRODUCTION

1.1 Project Summary

Type of Document: Environmental Impact Statement Preparation Notice (EISPN)

Project Name: …Makua Military Reservation, Island of O'ahu, Hawai'i

Applicant: U.S. Army Garrison-Hawaii (USAG-HI) &
U. S. Army Installation Management Command (IMCOM)

Agent: G70
111 S. King St. Suite 170
Honolulu, HI 96813
Contact: Jeff Merz, AICP
Phone: (808) 523-5866
Email: ATLR-OAHU-EIS@g70.design

Accepting Authority: State of Hawai'i (State)
Department of Land and Natural Resources (DLNR)

EISPN Triggers: Use of State lands (Hawai'i Revised Statutes (HRS) 343-5(a)(1)
Use of any land classified as Conservation District by the State land use commission under Chapter 205 (HRS 343-5(a)(2)

Project Location: Island of O'ahu, Hawai'i

Judicial District: Wai'anae

Tax Map Keys, Landowners, Administrators, and Approximate Acreage: All project parcels are owned by the State and administered by DLNR
*** Makua Military Reservation (MMR), 760 acres-**
TMKs 1-8-1-001:007 and 008; 1-8-2-001, 022, 024 and 025

State Land Use District: MMR – Conservation District

1-1

2.3.4 No Action Alternative

Under the No Action Alternative, the Army would not retain any of the State-owned land on **MMR after the current lease expiration.**

(Current leases expire on Aug. 16, 2029).

The No Action Alternative includes the following potential Army actions and responsibilities:

- Continue to use all State-owned land until the current lease expires.
- No longer fund or manage conservation and public use programs in the State-owned land after expiration of the current lease.
- Restore the State-owned land in accordance with he lease or otherwise negotiated with the State. The parameter for restoration of the State-owned land not retained would be defined and determined after completion of the EIS.

The No Action Alternate would release the Army from the following actions and responsibilities:

- Control and management of the State-owned land at the expiration of the current lease.
- Management of potential archaeological sites, fire prevention and control services, and ungulate control on State-owned land.

The Army would have access to U. S. Government-owned ands but would have no access to its utilities and infrastructure on State-owned lands, which could affect wildfire prevention and firefighting activities, training, range operations, and range and emergency services communication. **The No Action Alternative** would result in the loss of approximately 44 percent of the maneuver land on O'ahu (USARHAW, 2017b).

For **MMR,** Federal Executive Order (EO) 11166, *Setting Aside for the Use of the United Sates Certain Public Lands and Other Public Property Located at the Makua Military Reservation, Hawaii,* issued in 1964, provides for access rights. The Army would continue to have access to U. S. Government-owned lands via State-owned lands at **MMR** under the **No Action Alternative.** The Army would however no longer have access to portions of the Company Combined Arms Assault Course and have access t State-owned lands currently used for maneuver and other types of training and support facilities.

Johnnie-May Perry

No, no, no worries. So in today's paper, "Secretary of Army supports training ground lease renewal". That's Christine Wormuth. I know you have orders, and this is your orders. I would say no action, but to restore Makua.
And the bottom line is Hawaii economy. It's -- it's not against the people, but it's Hawaii economy. Now, if everybody -- war isn't -- war is very ugly. Nobody likes war. We prefer peace. But with war come destruction. And there's other --other ways, and with today's technology, you just push the button, and the whole world can be blown up.
But it's about Hawaii's economy. It's our legislature in Washington, D.C., that have a hand in this. But, you know, I was looking forward to 2029, but unfortunately, House Bill 499 came around, and it changed things. And how convenient that the governor put on a proclamation today which no in-person hearing is taking place. How convenient that came about.
I have nothing against the military. It boosts our economy. There's plus and minuses, and you're just doing your duty like you are expected to do. If not, we could be invaded by Russia, China. And, of course, there's other places to train. But it goes back to Washington, D.C., and Pentagon. So I would ask no action, but restoration. Mahalo.

U‘ilani Perry

"I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... We don’t want to hear the bombs or training anymore and we’d like to cultivate our ‘Āina and give it the love it deserves. I would like to submit the follow comments regarding the Army's upcoming Environmental Impact Statement, which proposes to retain up to 6,300 acres of land on O‘ahu for military training purposes. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a “no action alternative” as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the “fair treatment of all people”. Fair treatment means “no group of people should bear a disproportionate share of the negative environmental consequences”. The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military

training. The EIS should address the disparate impacts that these leases will have on these communities.

Ikaika Pestana

I oppose extending the army's lease. They degrade our lands with their violent mechanized weapons and explosions. They endanger nearby American citizen civilians. They waste land with bombs that the people of Oahu desperately need for growing food and building housing. That public land is worth millions and to just give away for $1 is a crime against Hawaii's citizens. The military crowd locals out of limited housing. They jam up our roads with traffic. They mostly shop tax free at the NEX or the commissary. They don't contribute meaningfully to Hawaii.

Ingrid Peterson

Okay. I'm from the windwardside, Kailua, where I've grown up since I was alittle girl. My husband's goes back generationshere. And this is just a little -- I'm actually on the fence as far as the military continuing operations in these areas, because I do know we have a need for a military and that they need a focalplace to train. My father was in the Navy on the EastCoast during World War II. My mother-in-lawwitnessed the bombing of Pearl Harbor from the hillsof Honolulu and went down with her mother, who was aRed Cross leader, and was there for three days. Shewas only 12 years old and will never forget it. So my main concern that I wanted to bringup is the biological resources, the naturalresources, specifically, the plants and animals inthese areas. Some of these areas I've actually beenhiking, up in Kahuku area and up in Pupukea. I think I've actually been illegally hiking there when I wasyoung, but -- and they're very beautiful. I know, as Darius mentioned, that we --well, actually, I didn't know we had 80 percent ofthe endangered species. But that makes sense,because Hawai'i, I know, has the most extinctspecies of at least of any place in the world, Ibelieve. My friend used to be head of the NatureConservancy when it was called the Bird Project,because we had so many extinct birds. Anyway, I just am concerned about youstudying the state of the species in these areas,especially the upland areas up in the forests andthe higher elevations, and studying the plants andthe animals and to see what state they're in now. I mean, you can't go backwards, butperhaps you'll have some sense of what, if any,damage has been done, and looking for ways tomitigate any harm, because Hawai'i is a very fragilenatural environment, as you know. And I learned recently from my state houserepresentative, Patrick Pihana Branco, that withclimate change -- and I know just from growing uphere in the '60s, it's gotten much, much hotter --but from climate change and with the heat, thetemperatures being hotter here now, the mosquitosare going up to higher elevations and endangeringthe birds in the uplands. And I'm sure there areother effects of climate change.So that's it, basically.I'm just really concerned about the biologicalresources and hope you'll be taking great measuresto mitigate that. Thank you.

Manny Petersen

Hello, my name is Manny Peterson is my last name. My number is XXX-XXX. I'm calling in regards to the lease extension for the military in Makua, Kahuku, and Wahiawa. I'm calling to oppose this extension and I would like to leave my testimony in regards to them, please give me a call back at XXX-XXXX. Mahalo

Rebecca Pierpoint

We have seen time and again the destruction and disregard that the U.S. military causes to the land and waters, contributing to the constant new extinctions of bird species and sea life. Their occupation of this sacred land, including using areas such as Koho'olawe and Western Oahu for targets, is built on stolen land, the overthrow of Queen Lili'uokalani, and the obliteration of the indigenous Hawaiian empire. The insult added to much injury is that the US Military leases this state-owned land of Wahiawa, Makua and Kahuku for $1. There is no price one could put on this land, and this lease, ownership, and stewardship should be given back to the people of Hawaii. In the event that this lease is renewed, the US Military must at least compensate the state and people of Hawaii not just adequately, but generously. The US Defense Department's newest budget calls for $715 billion, and we are clearly no longer spending trillions on the failed war in Afghanistan, so there is absolutely money in the budget. The question is, does the US Military negotiating this lease understand fairness, reciprocity, and responsibility enough to do what's right?

Melodi Pierro

Hello, my name is Melodi Pierro, and I am a resident of Oakland, California. I am strongly opposed to the extension of military leases on the lands of Makua, Kahuku, and Wahiawa.

An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of native Hawaiian plants and animals, and continually disrupt the lives of the local community.

The army has wrongfully leased these lands from the state for $1 since 1964. When the leases expire in 2029, this land should be immediately released to the public.
Thank you for considering my comment.

Heidi Pihana

Welina mai!
I'm in opposition of the extension, continuation or negotiation of the military leasing public lands. To further allow the use of our native land for exploratory, military drills and occupation has gone on for way to long and end to come to an end.

Growing up I had the privilege of living at Mākua in the 80‘s. My dad moved us to Mākua because work was slow and financially he was unable to provide for us. He grew up in Maui at "Raw Fish Camp" and he knew that fishing could feed us and bring in income. At Mākua we lived next to Pops & Ma Rapoza, they taught my siblings how to live from the `āina (land), kai (ocean) and how to mālama (take care) the resources we had. There were 12 families at the time still living at Mākua, living from the `āina and stewards of the `āina like the generations before them.

I was only 6 years old at that time. The military was already occupying the valley of Mākua. War games was practice there, at nights was the worst the bombing that to place would shook the land and the vibrations trembled our home and us. The bombing would lead to fires at times and the whole valley would burn. Mākua valley flourished with māile lauli`ili`i and other native ferns at one time but not now, not after years of bombing and burning. I‘m against military continuing to lease land at Poamoho, Kahuku, and Mākua.

Mahalo
Heidi "Kini" Pihana
Resident of Ma`ili

Keahi Piiohia

"I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... Every piece of our aina that can be cultivated must every space that can be left alone so our native ecosystems can be restored and thrive… not bomb, driven over, fires, oli and gas spilling for machines and vehicles. The aina needs a rest and put back in the the hands of people who will care and restore for the betterment of the people of Hawaii and not the American military. The EIS process currently considers a “no action alternative” as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Waiʻanae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ʻāina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the “fair treatment of all people”. Fair treatment means “no group of people should bear a disproportionate share of the negative environmental consequences”. The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ʻāina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawaiʻi: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawaiʻi residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities. These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Waiʻanae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities. Mahalo… let’s get our Aina back

Marisa Plemer

To the extension of 65-year leases to US Army Training sites in Makua, Kahuku, and Kawailoa, Oahu, because I am a lifelong resident who lives in between Kahuku and Kawailoa who is and probably has been in the direct line of “fire” incurred during the times when they conduct “training” while burning, bombing, littering and polluting our beloved and sacred lands. I say, NO MORE destruction because food, water, and shelter are all in critically short supply and with “climate change” all the people of these islands are facing catastrophic scenarios. What has been the outcome of the discovery of plutonium pollution on the Island of Hawaii many years ago? Who will tell us the truth? Where can we find any answers? As a resident, what is the effect on my health and my family’s health?

It is incumbent upon our political leadership and each and every resident to refuse to allow any further desecration and destruction by the US military when the 65-year leases expire in 2029. To preserve our homelands for our children, grandchildren, and posterity we must support the “NO ACTION ALTERNATIVE.”

Sincerely, Marisa M. Plemer

Sent from my iPhone

Hilinaʻi Pokely

Aloha, everybody. My name is actually Hilina'i Pokely (phonetic). I'm 19 years old. I'm from the island of Kauai, and I'm just going to be brief.
I just wanted to start out talking about that, you know, even though Hawai'i, we are now part of the U.S., but we make up 1 percent of their total land mass, yet we are responsible for 44 percent of their endangered plant species. And as indigenous people, we are responsible for 80 percent of the global biodiversity, so when you talk about the environment and what you have done, it's a joke. And, you know, the future is kanaka oiwi, and we will not be silenced. And although I don't know how seriously you will take this meeting and our voices and what we have said, but the land is our life, and we will fight forever until it is restored to us. Mahalo.

Barbara Pope

"I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... These lands are part of our heritage and should support our physical and spiritual health and wellbeing through agriculture, hunting, cultural practice, open space, and conservation. Our great grandparents and grandparents families worked and lived in these these lands and cared for them. Being restricted from access to these lands results in being separated from our connection to the lives of our elders. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good.

These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts.

The EIS process currently considers a “no action alternative” as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored.

Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the “fair treatment of all people”. Fair treatment means “no group of people should bear a disproportionate share of the negative environmental consequences”. The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world.

US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and

dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities.

These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai‘anae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities.

Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Wai‘anae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands.

In the Ching vs. Case ruling, the court found the state to have a trust duty to “mālama ‘āina” and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using.

These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through mo‘olelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access.

Environmental justice (EJ) as defined by the EPA requires “meaningful involvement” of impacted communities such that “decision makers will seek out and facilitate the involvement of those potentially affected.” Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Wai‘anae, Wahiawā, or Kahuku.

My grandfather's family worked on the land at Makua and the ancestors of family members are closely associated with these lands. They knew the place names, the wind names, the rain names and the stories about this valley. Their children and grandchildren and great grandchildren are restricted from Makua. There is a deep sadness in our community to know that this valley is now a foreign, off limits place.

Deborah Pope

Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a “no action alternative” as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai‘anae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities. Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Wai‘anae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands. In the Ching vs. Case ruling, the court found the state to have a trust duty to “mālama ‘āina” and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at

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Grant Porter

Please do not renew the leases of military lands on Oahu in 2029 at Makua, Kahuku, and Wahiawa. The public, especially native Hawaiians, deserve to have the land returned to them. The military use of this land is a poor use of land on a small, crowded island. It is a a poor use of valuable natural resources and it is disruptive to the ecology and sensitive native environments. Our land, our roads, and our watersheds have suffered long enough. The lands at Makua, Kahuku, and Wahiawa should be returned to the people of Hawaii when these leases expire in 2029.

Erin Potter

Hello, my name is Erin and I am a resident of upstate New York. I am strongly opposed to the extension of military leases on the lands of Makua, Kahuku,and Wahiawa. This is Native Hawaian land and should be treated and respected as such. The US military should have never been leased this land to begin with, much less for a single dollar. The leasing of this land to the US military disrespects the Indigenous people who live on and care for this land and whose identities are strongly tied to this land. Please consider Indegenous voices in this decision, not as equal voices but as booming voices that should roar over the others. Because this is their land, their culture, and their home and they deserve to have the most powerful voices in this decision.
Thank you

Caroline Powers

The land of Oahu that the US military is currently occupying should be given back to native Hawaiians immediately.

Shelly Preza

I would like to submit the follow comments regarding the Army's upcoming Environmental Impact Statement, which proposes to retain up to 6,300 acres of land on Oʻahu for military training purposes. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawaiʻi, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawaiʻi has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawaiʻi courts have also acknowledged the state's constitutional duty to mālama ʻāina. The leasing of ʻāina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ʻāina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on Oʻahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a "no action alternative" as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Waiʻanae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ʻāina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the "fair treatment of all people". Fair treatment means "no group of people should bear a disproportionate share of the negative environmental consequences". The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ʻāina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawaiʻi: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawaiʻi residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities. These military training lands are situated in communities that are majority

working-class, people of color, and Native Hawaiian. Kahuku, Waiʻanae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities. Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Waiʻanae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands. In the Ching vs. Case ruling, the court found the state to have a trust duty to "mālama ʻāina" and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using. These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through moʻolelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access. Environmental justice (EJ) as defined by the EPA requires "meaningful involvement" of impacted communities such that "decision makers will seek out and facilitate the involvement of those potentially affected." Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku.

Margaret Primacio

I oppose renewing leases for military training. Along with over tourism we have over militarism. Residents of Hawaii are left out of the resources for low cost housing, recreational spaces, natural resource conservation all at the hands of government leaders who do nothing to sustain and enhance our lives in Hawaii. See the history of criminal stewardship by the military and you'll witness no respect of the land and continued illegal occupation of the them. Time to hele and right the wrong. No more leases. Margaret PrimacioKahuku

O'ahu ATLR EIS Comments
P.O. Box 3444
Honolulu, HI 96801-3444

Michaela Primacio
[redacted]

August 26, 2021

Support for O'ahu ATLR at Kahuku Training Area, Kawailoa-Poamoho Training Area, and Makua Military Reservation

TO WHOM IT MAY CONCERN:

As a Kahuku Resident and Native Hawaiian, I am a proud family member of three U.S. VETERAN'S - my grandfather who served in the Vietnam War, my brother who served two tours in Iraq, and my sister who retired from U.S. Air Force.

During one of many "talk story" sessions, as we say in Hawai'i; my papa often would retell how he and his fellow soldiers crashed in a helicopter and survived in Vietnam. ***Thanks to his military training that he received at Kahuku Training Area before leaving for Vietnam.*** It was one of his proudest moments as he shared the picture with me. He very rarely spoke about the casualties of war and briefly mentioned the loss of a friend looking forward to returning home.

The threat to destroy America, its people, and our freedom is real. Not only on an International level but from within our country as well. For us locals who have family members - a son/or daughter, spouse, friend, brother, sister, ohana period - in the military....where should they go to get trained? If they can do it at home...why not? These lands are a vital component for the men and women in our armed forces who serve, protect, and defend our national security in conjunction with State-owned lands.

Regarding the O'ahu ATLR EIS at **Kahuku Training Area**, I am providing comments on the following for consideration to be included in the draft EIS:

Whereas Kahuku is located in the Ko'olauloa Moku (District);

Whereas Kahuku total land area is 2.3 square miles (1,472 acres) of which Land accounts for 1.0 square mile (640 acres) and Water 1.3 square mile (832 acres);

Whereas Kahuku Training Area consists of approximately 9,480 acres and 1,170 acres of State-owned lands;

Whereas Kahuku and its neighboring communities in the Ko'olauloa Moku (District) are rural, low lying coastal areas prone to flooding, storm surge, tsunami's, hurricanes and/or other natural disasters;

Whereas Kahuku has a total population of 2,960 according to the 2019 American Community Survey with 14.7% of its population under 10 years old and 21.1% are 60 years old or over;

Whereas Kahuku has only "One" hospital, Kahuku Medical Center, serving O'ahu's North Shore;

Whereas Kahuku has "Zero" Emergency Shelters in the event of an emergency evacuation, with the exception of Kahuku Elementary School dependent on approval from authorities;

With that said, global warming has increased natural disasters around the globe and nationally in the U.S. and pose severe impacts to loss of life, property, and economic recovery. Rural and coastal communities are even more susceptible to these impacts in ***accessing*** or ***receiving*** aid during an emergency.

Furthermore, rural and coastal communities like Kahuku have ***limited resources, space, and adequate shelter*** or access to resources, space, and adequate shelter to accommodate the current population and potential overflows from neighboring communities during an emergency.

In contrast to the 10,650 acres of Federal and State-owned lands at Kahuku Training Area and the vulnerability of a natural disaster and its impacts on Kahuku. I am requesting the Army and the State to consider the following:

- Provide Public Access to lands designated as "Safety Zones" in the event of an emergency
- Allocate funding to improve infrastructure, utilities, and facilities for Kahuku to have an Emergency Shelter
- Provide timely and accurate information on any environmental or health & safety issues

- Update and disclose information that is accessible and easy to find for citizens, elderly, and disabled persons
- Address, inform, educate and/or disclose to its citizens any mitigative actions that the Army and/or State has taken in previous, current, and future Environmental Impact Studies

Respectfully,



Michaela Primacio
Kahuku Resident

cc:
Governor David Ige
Mayor Rick Blangiardi
Representative Sean Quinlan
Senator Gil Riviere
Council Member Heidi Tsuneyoshi

Pumehana Puaoi-Perry

"I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... When I grow old I might want my keiki to cultivate as it's our birth right. I would like to submit the follow comments regarding the Army's upcoming Environmental Impact Statement, which proposes to retain up to 6,300 acres of land on Oʻahu for military training purposes. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawaiʻi, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawaiʻi has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawaiʻi courts have also acknowledged the state's constitutional duty to mālama ʻāina. The leasing of ʻāina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ʻāina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on Oʻahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a "no action alternative" as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Waiʻanae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ʻāina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the "fair treatment of all people". Fair treatment means "no group of people should bear a disproportionate share of the negative environmental consequences". The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ʻāina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawaiʻi: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawaiʻi residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these

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Lopaka Purdy

To: Col. Dan Misigoy U.S. Army Garrison Hawai'i
Aloha Col. Misigoy,
As a person who loves Hawai‘i and her people, I am firmly opposed to the Army‘s retention of any of the “State” lands at Mākua, Kahuku and Kawailoa-Poamoho. I support the “No Action Alternative” that would allow the three leases to expire and require the Army to comply with all lease terms that include the clean-up of these lands. Alternatives 1-3 all preserve the status quo in which Hawaiian land is bombed, burned, littered and polluted. The status quo is precisely what needs to be upended. As things stand, we are not able to provide for the basic necessities of the people of Hawai‘i. Food, water, shelter, are all in short supply, with the pending climate crisis intensifying the urgent need to re-focus on building resilience locally. Training soldiers for war in distant lands does nothing to address any of these problems nor the harm that training contributes to each. Scores of concerned citizens have taken time to express to you the impact of the long-term occupation of these lands and US military presence in our islands. Your study should follow the parameters set by these true experts on the impacts of your proposal. Our comments have raised the impacts of the occupation of these parcels, spanning time and space, and your EIS should follow suit. You should evaluate historical harms that would continue should you retain these lands, as well as the growing cumulative impact that would compound should you continue misusing these lands. Alternative futures that your retention of these lands would foreclose should also be considered. Please add to the "Alternatives" section, alternatives that include: 1) Diplomacy with those the military perceives as potentially requiring a combat response and disclosing disputes for civil remediation. This would eliminate the need for combat mission training exercises. 2) Reprioritize food security and resilient communities as a counterattack strategy. Rather than meet an attack in the theater of U.S. Pacific operations through armed forces, a counter-measure would focus on rebuilding the capacity of communities to rebuild and sustain themselves. This alternative would meet the purpose and need through the long term goal of securing Hawai`i against the depredations of state enemies. 3) Retention of lands to ensure appropriate stewardship and ecological preservation, including wildlife fighting capacity, for the duration of a planning period for transition to a public land trust and/or organizations or associations of communities that will properly steward the land. This would augment your "No Action" alternative and allow for immediate questions of landowner liability to be addressed to the U.S. military. Instead of insisting on the current path of retaining these lands, switch gears and genuinely engage the community on a clean-up plan that sets us on a path to return these lands to those who love them. This return of ‘āina is long overdue. The time is now to give the #landback.
Mahalo for your time and attention,Lopaka Purdy

Yvonne Pyle

Hello,

I believe that it is in the best interests of the Native Hawaiians that the Army removes their bases. The state of Hawaii was annexed to the USA against their will and should have the right to at least decide if they would like to have a military presence on their land. It also has a large environmental impact through noise and other pollution; Hawaii is a very important habitat home to lots of biodiversity and ecosystems. Lastly believe that removing the bases will allow the locals to better host tourism, which will eventually better the economy as a whole.

Sincerely,
Yvonne Pyle

Leslie Pyo

I am against the renewal of the US Army's land lease of Hawaiian land. This land belongs to Native Hawaiians and should be given back to them.

India Pyzel

"I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... Hawaiians deserve to have the rights to their lands without the government deciding what is and isn't good enough compensation for them. If Hawaiians don't want the military littering and destroying their lands this lease should not be renewed. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state's constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a "no action alternative" as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the "fair treatment of all people". Fair treatment means "no group of people should bear a disproportionate share of the negative environmental consequences". The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these

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Cam Quevedo

I am strongly opposed to the extension of military leases on the lands of Mākua, Kahuku, and Wahiawā.

An extension of these leases will allow the military to further damage the natural resources of these areas, destroy natural habitats of Native Hawaiian plants and animals, and continually disrupt the lives of the local community.

The Army has wrongfully leased these lands from the state for $1 since 1964. When the leases expire, this land should be immediately restored to the public and especially to the native people.

Sarah R

My name is Sarah and I live in Texas. I firmly oppose the extension of military leases on Mākua, Kahuku, and Wahiawā. The extensions will only harm more of the land's natural resources, demolish the homes of numerous species in the area and disrupt the lives of the people living near these regions. Since 1964 the Army has unjustifiably leased these lands from the state for $1 each year. When the lease expires in 2029, these territories should be given back to the public and recovered as soon as possible.

Jay Rachels

The injustices suffered by Native Hawaiians can never be fully reconciled; yet, the U.S. Military now has the opportunity to make great strides forward: to uphold its defense and peacekeeping duties in the pacific theater whilst returning lands no longer necessary to training or the strategic success of modern military initiatives. It is clear that a new military strategy is needed in the face of greater missile technologies available to possible threats. These strategies and the subsequent battle tactics required leave little need for sites such as those near Makua and Yokohama Beaches in western Oahu. This site should be returned to the state of Hawaii and the people of Hawaii. Furthermore, efforts should be made to see these areas remain protected from development by rent/profit seeking entities. Especially real estate endeavors that do little to restore and preserve Native Hawaiian culture.

Thank you for your diligence and consideration of these comments.

Commented in hopes of a beginning to long awaited restoration.

Jordan Ragasa

"I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... the environmental effects of prolonged militarism and occupation is detrimental to the health Hawai'i and future generations of our people. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on Oʻahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a “no action alternative” as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Waiʻanae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawaiʻi, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawaiʻi has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawaiʻi courts have also acknowledged the state’s constitutional duty to mālama ʻāina. The leasing of ʻāina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ʻāina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ʻāina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the “fair treatment of all people”. Fair treatment means “no group of people should bear a disproportionate share of the negative environmental consequences”. The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ʻāina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawaiʻi: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawaiʻi residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities. These military training lands are situated in communities that are majority

working-class, people of color, and Native Hawaiian. Kahuku, Waiʻanae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities. Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Waiʻanae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands. In the Ching vs. Case ruling, the court found the state to have a trust duty to "mālama ʻāina" and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using. These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through moʻolelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access. Environmental justice (EJ) as defined by the EPA requires "meaningful involvement" of impacted communities such that "decision makers will seek out and facilitate the involvement of those potentially affected." Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku. I want our young people to grow up in a Hawai'i wher e they are not constantly being woken by the thunderous roars of military aircraft flying overhead. We must raise our keiki in a Hawai'i that does not revolve around warfare and violence.

Miriam Ragsdale

Hello,
My name is Miriam Ragsdale, and I am from North Carolina. I am strongly opposed to the extension of military leases on the lands of Mākua, Kahuku, Wahiawā.
An extension of these leases would allow the military to further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals, and continually disrupt the lives of the local community.
The army has wrongfully leased these lands from the state for $1 since 1964. When the leases expire in 2029, this land should immediately be restored to the public.
Thank you,
Miriam Ragsdale

Sufia Rai

I, an American citizen, oppose the US army's lease renewal and continued occupation of land on Oahu.

Emily Rainey

Hello, To whom it may concern, My name is Emily Rainey and I am a resident of North Charleston, South Carolina. I am strongly opposed to the extension of military leases on the lands of Mākua, Kahuku, Wahiawā, and any other Hawaii State Land.
An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals, and continually disrupt the lives of the local community.
The army has wrongfully leased these lands from the state for $1 since 1964. When the leases expire in 2029, this land should be immediately restored to the public.
Sincerely, Emily Rainey.

Anna Rambow

Hello,
My name is Anna Rambow and I am writing to express my opposition to the extension of military leasing land on Makua, Kahuka, and Wahiawa in Hawaii. The extension of allowing this land to be used by the military is damaging to wildlife and native habitats. It is also disrupting the lives of the local community.
The Army has been leasing this land for $1 a year since 1964 and when the lease is up in 2029 this should not be allowed to continue any longer. It should be immediately given back to the community for growth instead of continual damage.
Sincerely, a concerned citizen.
-Anna Rambow

Laura Ramirez

As a resident of Hawai'i and a steward of this land,I strongly oppose the extension of military leases on Mākua,Kuhuku,and Wahiawā. Any extension of these leases will result in more damage to the natural habitat of native Hawaiian plants and animals that have suffered too much already. The pollution and disruption of life that the local community has been forced to endure must come to an end. These natural resources are worth much more than the unethical amount of $1 which amounts to theft. It is no longer 1964 and this kind of corruption can no longer be hidden and pushed through in backroom deals. These lands have been wrongfully leased to the Army and must be immediately restored to the public when the leases expires in 2029.

Ikaika Ramones

"I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... These lands serve a greater public good with potentials for agriculture, housing, conservation, cultural practice, and watershed preservation. Re-leasing of lands entails continued damage (and loss of cultural access) to archaeological sites and biocultural resources. Any EIS must survey 1) existing damage done to the entirety of these parcels; 2) fully disclose Army compliance to existing monitoring obligations; and 3) survey sites of historical importance by a Hawaiian archaeology consultant. I would like to submit the follow comments regarding the Army's upcoming Environmental Impact Statement, which proposes to retain up to 6,300 acres of land on Oʻahu for military training purposes. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawaiʻi, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawaiʻi has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawaiʻi courts have also acknowledged the state's constitutional duty to mālama ʻāina. The leasing of ʻāina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ʻāina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on Oʻahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a "no action alternative" as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Waiʻanae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ʻāina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the "fair treatment of all people". Fair treatment means "no group of people should bear a disproportionate share of the negative environmental consequences". The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ʻāina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawaiʻi: US intervention in the Philippines; the nuclear bombings of Japan;

military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities. These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai‘anae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities. Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Wai‘anae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands. In the Ching vs. Case ruling, the court found the state to have a trust duty to “mālama ‘āina” and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using. These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through mo‘olelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access. Environmental justice (EJ) as defined by the EPA requires “meaningful involve ment” of impacted communities such that “decision makers will seek out and facilitate the involvement of those potentially affected.” Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Wai‘anae, Wahiawā, or Kahuku. Please add any personal comments here. Military training exacerbates C/PTSD associated with my previous experiences (and those of many others in the

community) of state violence. The noise of exercises, equipment, and transportation; the sight of these infrastructures and personnel; and the knowledge of their damage to the landscape and communities are all factors that constitute a damage to members of the public.

Ikaika Ramones

My name is Ikaika Ramones.I'm a social anthropologist, who obtained my Ph.D.at New York University and my bachelor's inanthropology from Harvard University. I'm kanakamaoli from Kalihi Valley.My research, funded in part by theNational Science Foundation, includes how land usedecisions directly impact us Native Hawaiians, andmy data indicate that any EIS must take into accounthow these leases reproduce environmental racism andthe dispossession of an indigenous people from theirlands.My data indicate that U.S. military use ofHawaiian lands, the environmental and culturaldamage done, is detrimental to a specific group ofpeople, which contravenes the U.S. government's ownCivil Acts Right, Religious Freedom Restoration Act,and the 1993 Clinton Apology Resolution. I also want to clarify that thebifurcation of the environmental and cultural is anissue here. As precedent has shown in regard toindigenous people, that Hawaiian relations to landare at once cultural and environmental as a totality. That being so, any environmental damage isa cultural, health outcome, economic, andpsychological damage. Any EIS must includebiocultural impacts, especially with regard toNative Hawaiians. I also urge that a Hawaiian archaeologicalcompany, Nohopapa, is contracted to perform culturalimpact assessment rather than other firms that havea demonstrated lack of cultural literacy and ethicalconduct. Regardless of what mitigation is in place,the simple fact of the wanton use of Hawaiian landsrepresents a discriminant impact on NativeHawaiians. Any perfunctory or performativeconcessions would not address the systemic issue.The path most aligned with the state's own self-articulated institutional codes would be an EIS thataddresses biocultural impacts amounting to anegation of these leases. And to my lahui and theoccupying U.S. military, this will be the next Kaho'olawe, this will be the next Mauna Kea, butbigger and stronger. Mahalo.

Dylan Ramos

Aloha,

Whether you love, hate, support, and/or criticize the U.S. military, it is an incontrovertible fact that American militarism has directly and indirectly contributed to generations of environmental degradation. While there are laudable efforts by the military to support local ecosystems, the benefits simply do not outweigh the costs. This is particularly true in Hawai'i, where overlaying socio-political/cultural/historical factors link the very existence of so many military installations to the marginalization of Indigenous wisdom with respect to caring for the environment.

With the above in mind, I hereby express my solidarity with the many Native Hawaiians advocating for the no action alternative to end Army training land retention at the sites in question, or, short of that, the alternative option of retaining only bare-minimum training capacity.

Thank you,
Dylan Ramos

Sierra Ramos

This project is wrong and illegal ! Give the natives their land back ! The US occupied hawaii illegally this entire time and everyone is sick of it. Give natives their land back!

Chris Raynes

Hello, I am deeply concerned about the army's use of this land. Please stop your destruction of the land and give the land back to the indigenous people.

Rachel Reamsbottom

Native Hawaiians have been speaking out to say they never wanted or needed U.S. military occupation, and they are asking for their fellow Americans to help get the army out so they can finally have their land back. The U.S. army takes advantage of their own citizens by renting thousands of acres of Hawaiian land for $1/year for training purposes. Native Hawaiians are saying they hear explosions and gunshots from their bed. The army is destroying Hawaiian land and wildlife. The army is disrupting the lives of Hawaiians all over the island. And for $1/year the army is exploiting that which they do not own. Hawaiians and mainland Americans alike want the army out of Hawaii once and for all.

Sincerely,
A concerned citizen

Makana Reeves

As someone born and raised in Hawai’i, I am writing to recommend the US Army vacate Hawai'i lands at the natural termination of the existing lease. I am against a lease renewal on any terms whatsoever. The cultural, environmental, social and economic impacts are too great a cost to Hawai’i and its people.
Makana Reeves

Michael Reimer

Comments on the proposed lease extension ofmilitary lands in Hawaii used for training exercises Submitted by: Michael Reimer,Ph.D.XXXXXXXX@XXX.XXXAugust 22, 2021 Statements from U.S. Army personnel to the press concerning the lease extension for PTA seem to indicate that the extension request is a slam dunk, a done deal, for the U.S. Army. That is truly unfortunate as now any full Environmental Impact Statement that should be prepared would undoubtedly be a gloss-over and therefore an inferior and biased document.

There is a claim that this is just a real estate transaction and not an operations change, but that is false. As it stands, the lease expiration is the impending state of affairs. Renewal of the lease would induce the change from the otherwise scheduled quiescent state enacted when the lease expires. Thus, a full Environmental Impact Statement is required for any lease negotiation.

It must be recognized that this land that has been subject to extensive pollution and destruction can no longer be used for any natural purpose without extensive decontamination, detoxification, and restoration, if that is even possible. The clear evidence is that the U.S. military abrogates any and all responsibility beyond token measures for cleanup. Simply review the actions with Kaho`olawe. There is an unfortunate corollary to this failure for cleanup, a required covenant of the current lease but ignored nearly entirely by the U.S. Army showing the lack of true stewardship of the land, a position for which it deceivingly claims to partake. How ironic that one of the options the U.S. Army is considering is to trade some its training areas in Hawaii for new lands in the state; one can posit that the land it wishes to trade is now so destroyed and contaminated that it is no longer useful even to the military for training purposes. Who has the responsibility for this land restoration? Clearly, this is a mission flouted by the U.S. Military. It falls, therefore, to the State and Counties. Consequently, the U.S. Military minimally must place funds in escrow, a bonded account, for this cleanup. This activity and the methods used for mitigation and restoration must be a component of an Environmental Impact Statement and any subsequent lease agreement. There is a basis for determining these costs. That can be derived from the trite effort made by the military to clean up Kaho`olawe. Further, a few years ago, it provided the U.S. Nuclear Regulatory Commission an estimate for cleaning up the depleted uranium at PTA. That estimate was in the order of $60 million but no clean-up effort was ever initiated. There was only some limited sequestration of possible affected areas and a contrived monitoring program designed not to find any transport of depleted uranium. Another primary consideration is whether or not the military needs major land holdings in Hawaii to conduct its training exercises. It does not. A very similar siting equivalent to PTA is Fort Carson, Colorado. It has the mountainous terrain, the equivalent altitude and, in many respects, a superior climate for all-weather training challenges. Fort Carson (137,000 acres) is approximately the same size as PTA(133,000 acres) but has the addition nearby of about 235,000 acres called Piñon Canyon Maneuver Site used for Fort Carson training. Fort Carson is also used for inter-Branch training as PTA provides. For the last 20years or so, the military used the claim that PTA was needed for specific training in Afghanistan or other places in the Middle East. As those theaters now have significantly less U.S. military presence, Fort Carson would be an enhanced substitute for that equivalent training. It would prevent the continuing destruction of one of the few places on this planet that should be completely observed as a heritage site for pristine environmental and cultural preservation. The Environmental Impact Statement or any lease agreement must contain the acknowledgement that a fair price should be paid for any use of the lands for military purposes. Knowing that the military will not restore the land, the cost to the military must include funds held in reserve for such cleanup and, in fact, a thorough cleanup should

be conducted: first, for what is already ravaged, and second, after every maneuver activity. In a previous environmental impact statement, the military said that it contributes $12 billion yearly tothe economy of Hawaii. What was notincluded was the cost of the taking that the military consumes. A fair amount for the use of Big Island lands would be on the order of $600 million a year, inflation adjusted, or just about the yearly amount of the County budget. That is just 5 percent of the claimed $12 billion and but a mere fraction of a percent of the yearly appropriation for military spending. Those funds should be spent after every and all training actions to clean up the land and then adjusted as needed to cover the entire clean-up cost. As the military refuses such cleanup, it befalls the County and it should be paid for by the military. There has been a recent proposal to have the entire Island classified as a Sentinel Landscape. This seems to imply that a buffer area around the training sites would be created to prevent urbanization. This is, of course, a further taking of land by the military. A comment was that the land would be used for agriculture or grazing but it is common knowledge thatadjacent lands are also contaminated by transport of toxic materials from actual training impact sites. Any use of the land pretending to be suitable for agricultural activities would bedangerous and be a clear and present health risk to anyone working those lands or consuming products from those lands. The face of war has changed and no one is more acutely aware of this than the U.S. military. Of all the military engagements involving U.S. troops after World War II, none has been more successful than the involvement of the military in the Berlin Airlift. This was a humanitarian effort and not one of destruction and obliteration. In today's world, the national security provided by our military must involve more than simply honing a killing machine through destruction of the land and placing citizens in harm's way. Is it not time for any military presence in Hawaii to be a show of peace and not destruction? In sum, the leases should not be renewed. As a demonstration of good faith and recognizing the needs of the 21st century, the Army should initiate the termination of the lease and begin cleanup of the present sites to validate its otherwise specious claim that it is a good steward of the land. Let it be that the Big Island becomes a demonstration of military humanitarian efforts and not one of destruction of the `aina and cultural heritage. No leases need to be renewed to commence this new beginning.

To: Oahu ATLR EIS Comments
P.O. Box 3444,
Honolulu, HI 96801-3444

From: Michael Reimer, Ph.D.
[redacted] MR

Date: August 22, 2021

Re: Comments on the proposed lease extension of military lands in Hawaii used for training exercises

Enclosed are comments on the proposed lease extension of military lands in Hawaii used for training exercises.

Thank you for your attention.

Oahu ATLR EIS Comments, P.O. Box 3444, Honolulu, HI 96801-3444

Comments on the proposed lease extension of military lands in Hawaii used for training exercises

Submitted by:

Michael Reimer, Ph.D.
[redacted]
August 22, 2021

Statements from U.S. Army personnel to the press concerning the lease extension for PTA seem to indicate that the extension request is a slam-dunk, a done deal, for the U.S. Army. That is truly unfortunate as now any full Environmental Impact Statement that should be prepared would undoubtedly be a gloss-over and therefore an inferior and biased document.

There is a claim that this is just a real estate transaction and not an operations change, but that is false. As it stands, the lease expiration is the impending state of affairs. Renewal of the lease would induce the change from the otherwise scheduled quiescent state enacted when the lease expires. Thus, a full Environmental Impact Statement is required for any lease negotiation.

It must be recognized that this land that has been subject to extensive pollution and destruction can no longer be used for any natural purpose without extensive decontamination, detoxification, and restoration, if that is even possible. The clear evidence is that the U.S. military abrogates any and all responsibility beyond token measures for cleanup. Simply review the actions with Kaho`olawe. There is an unfortunate corollary to this failure for cleanup, a required covenant of the current lease but ignored nearly entirely by the U.S. Army showing the lack of true stewardship of the land, a position for which it deceivingly claims to partake. How ironic that one of the options the U.S. Army is considering is to trade some its training areas in Hawaii for new lands in the state; one can posit that the land it wishes to trade is now so destroyed and contaminated that it is no longer useful even to the military for training purposes.

Who has the responsibility for this land restoration? Clearly, this is a mission flouted by the U.S. Military. It falls, therefore, to the State and Counties. Consequently, the U.S. Military minimally must place funds in escrow, a bonded account, for this cleanup. This activity and the methods used for mitigation and restoration must be a component of an Environmental Impact Statement and any subsequent lease agreement. There is a basis for determining these costs. That can be derived from the trite effort made by the military to clean up Kaho`olawe. Further, a few years ago, it provided the U.S. Nuclear Regulatory Commission an estimate for cleaning up the depleted uranium at PTA. That estimate was in the order of $60 million but no clean-up effort was ever initiated. There was only some limited sequestration of possible affected areas and a contrived monitoring program designed not to find any transport of depleted uranium.

Another primary consideration is whether or not the military needs major land holdings in Hawaii to conduct its training exercises. It does not. A very similar siting equivalent to PTA is Fort Carson, Colorado. It has the mountainous terrain, the equivalent altitude and, in many respects, a superior climate for all-weather training challenges. Fort Carson (137,000 acres) is approximately the same size as PTA (133,000 acres) but has the addition nearby of about 235,000 acres called Piñon Canyon Maneuver Site used for Fort Carson training. Fort Carson is also used for inter-Branch training as PTA provides.

For the last 20 years or so, the military used the claim that PTA was needed for specific training in Afghanistan or other places in the Middle East. As those theaters now have significantly less U.S. military presence, Fort Carson would be an enhanced substitute for that equivalent training. It would prevent the continuing destruction of one of the few places on this planet that should be completely observed as a heritage site for pristine environmental and cultural preservation.

The Environmental Impact Statement or any lease agreement must contain the acknowledgement that a fair price should be paid for any use of the lands for military purposes. Knowing that the military will not restore the land, the cost to the military must include funds held in reserve for such cleanup and, in fact, a thorough cleanup should be conducted: first, for what is already ravaged, and second, after **every** maneuver activity. In a previous environmental impact statement, the military said that it contributes $12 billion yearly to the economy of Hawaii. What was not included was the cost of the taking that the military consumes. A fair amount for the use of Big Island lands would be on the order of $600 million a year, inflation adjusted, or just about the yearly amount of the County budget. That is just 5 percent of the claimed $12 billion and but a mere fraction of a percent of the yearly appropriation for military spending. Those funds should be spent after every and all training actions to clean up the land and then adjusted as needed to cover the entire clean-up cost. As the military refuses such cleanup, it befalls the County and it should be paid for by the military.

There has been a recent proposal to have the entire Island classified as a Sentinel Landscape. This seems to imply that a buffer area around the training sites would be created to prevent urbanization. This is, of course, a further taking of land by the military. A comment was that the land would be used for agriculture or grazing but it is common knowledge that adjacent lands are also contaminated by transport of toxic materials from actual training impact sites. Any use of the land pretending to be suitable for agricultural activities would be dangerous and be a clear and present health risk to anyone working those lands or consuming products from those lands.

The face of war has changed and no one is more acutely aware of this than the U.S. military. Of all the military engagements involving U.S. troops after World War II, none has been more successful than the involvement of the military in the Berlin Airlift. This was a humanitarian effort and not one of destruction and obliteration. In today's world, the national security provided by our military must involve more than simply honing a

killing machine through destruction of the land and placing citizens in harm's way. Is it not time for any military presence in Hawaii to be a show of peace and not destruction?

In sum, the leases should not be renewed. As a demonstration of good faith and recognizing the needs of the 21st century, the Army should initiate the termination of the lease and begin cleanup of the present sites to validate its otherwise specious claim that it is a good steward of the land. Let it be that the Big Island becomes a demonstration of military humanitarian efforts and not one of destruction of the `aina and cultural heritage. No leases need to be renewed to commence this new beginning.

Alondra Reyes

Aloha, My name is Alondra Reyes and I am a resident of Texas. I am strongly opposed to the extension of military leases on the lands of Mākua, Wahiawā.
Extending these leases would allow the military to continue damaging nature resources in these areas. Not to mention it will destroy natural habitats of native Hawaiian plants and animals and continually disrupt the lives of the local community
The Army had wrongfully leased these lands from the state for $1 a year since 1964. When the lease expires in 2029, the land should be immediately restored to the public.

Jacky Reynaga

My name is Jacky and I am a resident of California. I am strongly opposed to the extension of military leases on the lands of Mākua, Kahuku, Wahiawā. An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of Natibe Hawaiian plants and animals, and continually disrupt the lives of the local community. The army has wrongfully leased these lands from the state for $1 since 1964. When the lease expires in 2029, this land should be immediately restored to the public.

Marie Richards

Good morning,
I am writing in regards to the U.S. military occupation of Hawaii. My name is Marie Richards and I am a resident of Maine. I am strongly opposed to the extension of military leases on the lands of Makua, Kahuku, and Wahiawā.
An extension of these lands will allow the military to further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals, and continually disrupt the lives of the local community.
The U.S. Army has wrongfully leased these lands from the state for $1 since 1964. When the leases expire in 2029, this land should be immediately restored to the local residents of Hawaii.
I appreciate your time.
Sincerely,
Marie E. Richards8th Grade ELA TeacherMSAD #59Madison School DistrictB.A. EnglishUMF AlumnaM.A. Creative Writing and EnglishSNHU Alumna

Diana Richardson

As a former resident of both Oahu and Kaua'i for several years, I am writing to say, as a non-Hawaiian, that I firmly oppose the releasing of Hawaiian lands to the U.S. Government for military--or any other use. Hawaiian lands for Hawaiian people!... who have long been the resilient victims of theft by the U.S. government. I urge you to refuse to re-lease the lands currently held by U.S. government for military uses.Sincerely,Diana Richardson [redacted]

Kahu Ricky

Yes, this is Kahu Ricky, I'd like to see Makua closed. Pohakuloa and other training areas, we need to work on a treaty. We have the leaps and bounds alone do title for all mineral rights, land air and sea 12 miles. We need to create a treaty with United States government because the trust that we were had a relationship with is now over. We need to look at a local title bonafide land ownership of mineral rights land, air and sea minerals. These minerals need to be in a treaty this Treaty needs to be discussed with the United States Army General down at West lock Pearl Harbor. This Treaty needs to be discussed between the families with the load your title only, not the state not OHA and not DHHL which are agents of the state. That would be not quasi authorization not bonafide we need to get bonafide paperwork ownership contracts and treaties. These treaties need to be bonafide with the proper authority figures which would be United States military and the indigenous people. Matthew Kahoopili. That discussion needs to be discussed. And we need to start talking about jurisdiction, jurisdiction of the United States government here in Hawaii. And the relationship to the indigenous people of the people of the islands and archipelago not native Hawaiians not a quasi term from the United States government or state agents. These agents are only manager agents, they do not have any bonafide ownership or authority that needs to be discussed. You cannot be signing contracts with quasi people, managers, like the State agents which don't have the proper authority or jurisdiction anything other than that would be falsified. Would be false or fraudulent. We need to be looking at again. Jurisdiction. A treaty with the United States government and in that Treaty, we could discuss the land rights and land usages. We do need training here, but we need to do training that would be appropriate and fit into the people here. The training needs to be something that fits it cannot be something against the people or that that creates a safety hazard or a health hazard for the people. Or something that creates conflict with the culture or heritage of the people of the land title, land usages, land mineral rights. those mineral rights are protected. International law protects those indigenous people and the mineral rights. And the right to those mineral rights. Anything other than that would be a war crime or genocide of a culture and people. Any war crimes that unites these create here will be tested to and will be dealt with. That's war crimes will be dealt with in the world International law in the court system. Anybody who interferes with international or interferes with indigenous people and there's a religious police and the land use beliefs on their rightful Will be prosecuted. You can be extradited and things can be confiscated all equipment on land all equipment on land that's not that own the military than that on land. The state of Hawaii does not own land can be confiscated. And again, that can be extradited. So people can be confiscated like again, people can be prosecuted for interfering. No matter who you are, United States government, state governors, State people, Attorney General's they can be prosecuted for interfering with another people. You folks going to have to produce your bona fide Land Title. The state and the Attorney General is going to have to produce a bonafide Land Title of mineral rights and authorization. Those authorizations can only be done by the 10 families. From the 1842 Land Commission award. 1842 Land Commission award is the only people that have the authority for all and mineral right. Other than that, everything else will be falsified fraudulent. This will be investigated. Worst case scenario, they will be in the court system. And you folks going to have to provide"

Kady Riggan

The best thing for the environment of this land is to give at least a portion of it back to the native people of Oahu. The US Military does not care about the well being of this land and the continued training on it will do more harm than they have already caused.

Catherine Ritti

I do not support Army training land retention on Oahu, especially at the Makua site. These are supposed to be public lands and any revenue made should be "for the betterment of the conditions of native Hawaiians." However, the state is charging $1 for military use of these lands and has continued to manage these lands recklessly at the expense of the environment and the Hawaiian community. These lands were stolen and should be rightfully returned to be stewarded by the Native Hawaiian community.

Juanita Rivas

The land should be immediately restored to the public.

Andy Rivers

"I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... It is native lands, stolen land I would like to submit the follow comments regarding the Army's upcoming Environmental Impact Statement, which proposes to retain up to 6,300 acres of land on Oʻahu for military training purposes. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawaiʻi, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawaiʻi has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawaiʻi courts have also acknowledged the state's constitutional duty to mālama ʻāina. The leasing of ʻāina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ʻāina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on Oʻahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a "no action alternative" as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Waiʻanae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ʻāina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the "fair treatment of all people". Fair treatment means "no group of people should bear a disproportionate share of the negative environmental consequences". The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ʻāina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawaiʻi: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawaiʻi residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these

communities. These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Waiʻanae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities. Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Waiʻanae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands. In the Ching vs. Case ruling, the court found the state to have a trust duty to "mālama ʻāina" and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using. These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through moʻolelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access. Environmental justice (EJ) as defined by the EPA requires "meaningful involvement" of impacted communities such that "decision makers will seek out and facilitate the involvement of those potentially affected." Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvem ent to Waiʻanae, Wahiawā, or Kahuku.

Robert Robello

I’m writing in response to Ann Wright’s letter in this morning’s Star Advertiser, “Military should return Hawaii lands.” I recognize the need for military readiness and a strong military presence in Hawaii, a state with an important strategic position in the Pacific. The military significance of Pearl Harbor was the main reason Hawaii was annexed, and that significance would seem to be as important today as ever, with China, Russia and North Korea as Pacific Rim adversaries. That said, with only 6,400 square miles of land mass, and a population over 1.4 million, Hawaii is one of the most densely populated states in the country, with a steadily increasing population. I think it is time for the U.S. military to consider moving training areas from Hawaii to other states with greater land area and less population density, such as California, Oregon, Washington, Utah, Nevada, and Arizona. The Pentagon has over six years to find suitable training grounds, so now is the time to start looking.
Respectfully,
Bob RobelloHawaii Resident

Willow Roberts

"Hello this is Willow Roberts from Naperville, Illinois, and I'm strongly opposed to the extension of military leases on the lands of Makua, Kahuku, and Wahiawa. Sorry for my pronunciation, but an extension of these leases will allow the military to further damage the natural resources of these areas. It will destroy the natural habitats of Native Hawaiian plants and animals and it will continually disrupt the lives of the local community. The Army has wrongfully leased these lands from the state for $1 since 1964 and when the leases expire in 2029 this land should be immediately restored to the public. Thank you. Goodbye. "

Mark Robinson

I have lived at Sunset Beach for several decades. I understand the need for military training. I do think that the Army should be more sensitive to the disruption that flying their aircraft over residential areas late at night causes. Many times I have observed that their maneuvers involved flying low in the same pattern repeatedly crossing over the residential neighborhood for several hours in the middle of the night.
I would suggest that flight rules need to be adopted to prevent that from happening going forward. At the very least a minimum altitude of 4,000ft for aircraft flying over residential homes should be adopted.

Darlene Rodrigues

Hi. My name is Darlene Rodrigues, and I live here in Mililani. And I say no more leases to the U.S. military in Hawaii, and also such as Guam, Okinawa, and Jeju, just to name a few.
I come speaking as a gold star family member. My cousin was killed in action in Iraq serving in the U.S. Army. She graduated from Leilehua, so I speak with an understanding of what the Army does and also some aloha for people in the Army, because I have many family members who serve.
But I grew up in Wahiawa and Mililani, and I live here in Mililani now, and I realized growing up that before, the Army was just the neighbor that lived behind the fence. You know, there was access to things like Honeycomb Crunch on the military base at the commissary, something that we saw commercials for that we had a yearning for but couldn't get access to. We didn't have a pass to go on base.
So I grew up thinking the military had something that I coveted, that the Army would give us a way out of our plantation existence. And many of my family joined the military.
But in high school, I learned about Kaho'olawe, and I found out about the desecration of the island by treating it as a target practice. And then I learned about the U.S. military and how it was tied to an illegal overthrow. And suddenly, the neighbor behind the fence became an uninvited guest. And then now as an adult living in the home, my home in Mililani, and hearing the bombing practice at night or driving past the convoys on the freeway, and seeing that the convoys that used to be green are now the color of sand, and I learn about the large areas of land controlled and used by the U.S. military, such as Makua Valley.
And then I realized that Kaho'olawe was not just an island far away. They're tied to the land and place that I live now. And the uninvited guest behind the fence is an invader which has taken up land and the people that I lost.
No more U.S. military bases anywhere and leases for this reason, not just for the million other reasons that were just given, rightly so, by kanaka maoli and what has happened to their -- to their kingdom and their people.
We need to stop doing this to our own people and to other people elsewhere. No one deserves this. I really hope that you work yourself out of a job, Colonel. I really do. Because this planet doesn't need it, and we need more people to get us out of just what's going on in terms of climate, what's going on in the climate.
So there's no -- no ill will, other than knowing that there are different things that we must work at. And finding out today that we might be in a place where we can get out of, we need to put our resources there, and not in taking war from other places to target practice or any of those things.
So thank you. Daghang salamat. No. No to these leases. Not for a dollar, not for five trillion, million dollars. No. The answer is no. Thank you.

Kaylin Rogers

Please do not renew the military's lease on the island of Oahu. This takes lands away from native Hawaiians and damages the island's ecosystems. The land should be returned to native Hawaiians and military occupation should cease immediately.

Tara Rojas

This is my written testimony exactly how I sent it to Gil Tam, one of the two Hawai‘i based appointed Civilian Aides to the Secretary of the Army (CASA) which also serves as my written testimony to you, the Army, directly. ~•~•~•~•~•~•~•~•~•~Online EIS Scoping Testimonies 8/10/21 & 8/11/21 re: Army Lease in Hawai‘i Expiring 2029 Aloha e Gil,Mahalo for fulfilling your duty by starting to review the videos and stating to finish them in their entirety as well as to 'listen closely', much appreciated. The community gave their heart and soul, and in several instances, generationally. 100% of Community of Hawai‘i says NO. The two nights of testimonies were 100% Option 4, No Action = No Lease Extensions. I would like to share this mana‘o: "For Kānaka Maoli (and many of our indigenous relatives) a sense of place is of paramount importance to our way of being. We acknowledge that we do not belong in certain places. That we are also visitors in certain spaces. That when we ask for permission to enter a place sometimes the answer is No. Uncultured colonizers do not respect this epistemology and will serve their selfish desires despite Lack Of Consent. Sound familiar?" ~KanakaAutonomy Will the Army take a resounding "NO" for an answer? Or will the Army continue to push through as stated by the Secretary of the Army in this article* to "find a way to renew the leases in a way that lets the training continue while addressing community concerns"? [*article: Caution-https://www.stripes.com/branches/army/2021-08-10/army-secretary-christine-wormuth-hawaii-training-grounds-2514694.html] Again, it is clearly recorded (Caution-https://www.youtube.com/usaghawaii/live) the two nights of testimonies by Community were 100% Option 4, No Action = No Lease Extensions. ABSOLUTE NO *"way to renew the leases in a way that lets the training continue while addressing community concerns" = NO. NO is NO. In your volunteer position as an officially appointed CASA liaison, are you able to place aside your personal military: service, involvement, support, mindset in order to effectively and truly make known to the Army/Secretary of the Army the community voices and decision? No Lease Extensions. The community wants the Army to use these 8 years, instead of an EIS, to clean up the ‘Āina and leave in 2029. The community has spoken and offered to HELP clean up. The Hawai‘i Supreme Court unanimous decision 5-0 also confirms the Army's need to clean up in this article**: "High court rules state breached trust duties at Pohakuloa Training Area". [**article: Caution-https://www.hawaiitribune-herald.com/2019/08/23/hawaii-news/high-court-rules-state-breached-trust-duties-at-pohakuloa-training-area/] The presentation stated the Environmental Topics to be analyzed in the EIS are mute as the Army violated and continues to violate in complete disregard each one of them...to the detriment of: the community, areas where they are located, the entire islands of Hawai‘i. Thus, please relay to the Secretary of the Army, Christine Wormuth, that the community wants the Army to stop with this EIS and to change it to an "8-YEAR CLEAN UP & RESTORATION PLAN" in order to leave promptly upon Lease Expiration in 2029. 2021-2029 = 8-YEAR CLEAN UP & RESTORATION PLAN. Please hold the Army accountable to its own standards and seven values (loyalty, duty, respect, selfless service, honor, integrity, personal courage) as mentioned in the article*** which states that the seven values "are our baseline, our foundation, and our core. The moral and ethical tenets of the Army Values characterize the Army culture and describe the ethical standards expected of all Soldiers". Also uphold the Army themselves as an entity as ***"the Army must continue to adhere to these Army Values" - in this specific case, to the Hawai‘i Community and to Hawai‘i itself upon leaving (the illegally stolen and occupied lands they are living in, training in, destroying, and contaminating) at the end of Expiration of Lease ($1 for 65 years) in 2029. [***article: Caution-https://www.army.mil/article/49405/army_values] From the Army's website**** in their own words, which they need to adhere to, can you please relay to them through Christine Wormuth what they say about: "Many people know what the words Loyalty, Duty, Respect, Selfless Service, Honor, Integrity, and Personal Courage mean. But how often do you see someone actually live up to them? Soldiers learn these values in detail during Basic Combat Training (BCT), from then on they live them every day in everything they do — whether they’re on the job or off. In short, the Seven Core Army Values listed below are what being a Soldier is all about." and specifically in regards to how the entire EIS - proven by the Hawai‘i Surpreme Court's decision regarding the Army's breached trust duties - to be in violation of everything it's stating to review ADDITIONALLY in violation of the Army's Core Value of INTEGRITY: "INTEGRITYDo what’s right, legally and morally. Integrity is a quality you develop by adhering to moral principles. It requires that you do and say nothing that deceives others. As your integrity grows, so does the trust others place in you. The more choices you make based on integrity, the more this highly prized value will affect your relationships with family and friends, and, finally, the fundamental acceptance of yourself." [****website: Caution-https://www.army.mil/values/] There is NO WAY to "to renew the leases in a way that lets the training continue while addressing community concerns" as the Hawai‘i Community clearly states: OPTION 4, NO ACTION = NO LEASE EXTENSION. LEASE EXPIRES 2029. Gil, will you relay this clearly stated community decision to Christine Wormuth? Gil, will the Army uphold its own core value of Integrity and take NO as an answer? Gil, will the Army fulfill its breached trust duties and clean up? Gil, will the Army leave upon Lease expiration in 2029? Gil, will there be zero Army presence in 2030? Gil, will there finally...after 128 years of illegal occupation[Caution-https://hawaiiankingdom.org/blog/national-lawyers-guild-acknowledges-hawaii-is-illegally-occupied/], after 124 years of the Hawaiian people saying NO [Kū'ē Petition of 1897, Caution-https://www.archives.gov/education/lessons/hawaii-petition], after 123 years of forced NO CONSENT GIVEN illegitimate annexation[Caution-https://hawaiiankingdom.org/blog/an-act-of-war-of-aggression-united-states-invasion-of-the-hawaiian-kingdom-on-august-12-1898/]...the will of, voices of, and clearly-stated decision of the Hawaiian people and of the Hawai‘i community be hEArd and respected? NO is NO.LEASE EXPIRES 2029.ARMY 8 YEARS TO CLEAN UP - RESPECTARMY CORE VALUE - INTEGRITYARMY LEAVE 2029.NO is NO. Mahalo nui for your role as a CASA, Gil.Mālama pono,Tara

Tara Rojas

Aloha. I would like to ask -- request for 30 seconds just to say this -- I know it's the first one; I'm the first one up -- because there is no excuse. From a billion-dollar entity, you had, like, three, four hours to prepare for this. It is not hard to coordinate a Zoom link in which we can all see each other, mimicking an in-person session. I already called Amy, I already called the PR, and I gave the same comments. It's not hard, and especially to unlock the chat. So I just -- it's not related to my two minutes, and I just wanted to say that, because you had enough hours to create a Zoom link to mimic the in-person. And -- and you're saying the presentation for 75 minutes, where we are in the process, it's really important, and yet you -- the other man who spoke seemed apologetic about it but, you know, we have 75 people; unfortunately, we're going to be here for a long time. We don't care, you know. It's been 65 years of occupation of illegally stolen, you know, lease land. So I just wanted to say there is no excuse. If you are planning to -- you know, you can coordinate a response for warfare and, you know, for everything, but you have -- there is no excuse to not have this already set up within hours to prepare for it, given the governor's mandate today. So I just wanted to say that first. There is no excuse. Okay. So my two minutes, I'll go ahead right now and be respectful of everybody's time. So when -- Yeah. You have to allow us to say that, you know. If you can be apologetic, we can express what we're feeling as well. So again, when will no be no with the military, with understanding, with everything. Everything in the presentation can be summed up by the Native Hawaiians, who have been for 128 years, illegally occupied. You know the results. There has been the court case by Auntie Max and Uncle Fu Ching about the Army's failure to uphold their portion of the conditions of leasing the land for $1 for 65 years. You have not cleaned up. We don't need training on Hawai'i sacred, beautiful kanaka maoli land. You have other plans to train. The Hawaiians, the Hawaiian allies have spoken. And no is no. We teach our children from small, do not steal, return what is not yours. We have Title IX about harassment. Nothing is done, but yet when we try to stand for what is right and what is pono, we are immediately either, you know, arrested or cited. Yet there is no excuse to have an action against kanaka maoli, yet big entities like the military, the government, they can always, oops, you know, I'm sorry, oh, let's do this. And they don't even follow -- you don't even follow your own laws. It is in there. It is in books published. It is online. Everything you need to know about the negative, detrimental effects of military in Hawai'i against Hawaiians, the land, and everything that encompasses aloha "aina. So the toxic pollution in the ocean. Take a look at Terry Lilley's documentation about the effects on the honu, the chemicals that you guys are, you know, dumping in the ocean. Yeah. So it's affecting. It's documented. We just stood at Laniakea because the state and the leadership is not doing nothing to even protect the honu, you know, which is extension of Kaneloa, extension of Hawaiians -- to do anything. The community has to take a stand always to do something, and we're always policed. We're always not excused. There is no excuse. Lease is up - $1, ridiculously, for 65 years. The lease is up. I recommend and I strongly am for no action. It is time for Hawaiians to live on their own land. Hawai'i is Hawai'i because of Hawaiians. Please find other lands. Please leave at the end of your lease. Mahalo.

Tara Rojas

Aloha. This is Tara Rojas. And I just want to say a comment to Colonel Misigoy. What will it take for you to take this up to your higher ups and just to say stop? The people have spoken. We don't need an EIS. Let's work from now, 2021, and let's work on an eight-year plan to clean up this 'aina and leave promptly in 2029, if not before. But literally, what will it take for you to stop this, hear the residents, the kanaka maoli, to hear the people?
I believe that it is not just a show. I believe that this is what you are looking for, to hear us and to take action upon it. So if the plan is not to do a cleanup from now, to leave, for eight years, to leave in 2029, then, no, you know, that I
Is what you are willing -- are you willing to go against the Hawaiians, the people and everything you just presented to us and everything you just said and all the years you've been here, to go against those who are willing to stand up, after having said it formally, that you have no consent, you are here illegally, and to please clean up andleave? Because that is where we are at now in 2021.
And I just want to end with this, that, you know, we learned from the Mauna. (Speaking Hawaiian.) Mahalo.

Tara Rojas

And I just want to say mahalo e, Kahau. I looked up and I see, you know, what you stand for, and I just give you credit for being in the position you're in now. Okay. So I have three things that, you know, I want to say. Let's see, regarding the EPA, United States Environmental Protection Agency, how it relates and the court, the Hawaii Supreme Court ruling, and Army values. So I'm going to go ahead right into it right now. So on the actual page, it says (inaudible) military munitions and federal facilities. A quick summary. To safeguard human health and environment, EPA and the Department of Defense must address the contamination legacy left by military munitions and exposes a concern. Munitions, unexploded ordinance, and other hazardous munitions materials left behind from military live-fire training or testing, open burning and opened detonation and munitions treatment destruction and their activities. According to a December 2003 Government Accountability Office report, DOD suspects or acknowledges contamination by military munitions of an estimated 50 million acres of land. DOD estimates cleanup of these sites would cost from 8 billion to 35 billion. DOD transferred control of millions of acres of land used for manufacturing munitions to non-federal entities or the federal agencies to use for purposes other than their original intent. Most of these properties are now formerly used defense sites. The actual and potential human health and environmental effects of exposure to MEC or munitions constituents can vary from localized to widespread. Besides the obvious danger exploding ordinance, harm can also result when humans in the environment are exposed to chemical warfare agents or other hazardous substances used in munitions. Contamination of soil and groundwater is the big concern. So everything you have in your EIS, everything that you presented on that last page of concern, it is on the EPA website. And August 23rd, 2019, the Hawaii Supreme Court rules state breached trust duties at Pohakuloa Training Area in a five to zero vote, overwhelming vote, that the state hasn't properly managed ceded lands at Pohakuloa lease lands for military training. And this was a case filed by Native Hawaiian Legal Corporation on behalf of Clarence Ching. Uncle Ku Ching and Auntie Maxine Kahauleilio are two Native Hawaiian cultural practitioners. Yeah. They found that you have not done your job of cleaning up. And this last thing is -- I'll go into that more, but my little one wants to speak, too. The Army values. I have your page open. Loyalty, duty, respect, selfless service, honor, integrity, and personal courage. So Colonel Misigoy, the last statement you gave after yesterday's meeting, you were, like, you know, I appreciate that you see me as a human. I understand the relationships I have, you know, with you all here. However, we're going to continue with this EIS. This is overwhelmingly, 100 percent against renewing of these leases. No action taken. Eight years to clean up and to leave. And again, going into this integrity, do what's right. This is from the Army website. Do what's right legally and morally. Integrity is a quality you develop by adhering to moral principles. It requires that you do and say nothing that deceives others -- which is what is happening right now. As your integrity grows, so does the trust others place in you. There is no trust. The more choices you make based on integrity, the more this highly prized value will affect your relationships with family and friends and, finally, the fundamental acceptance of yourself. So really think about it. I also looked online, the hierarchy where you are at, Colonel, and there's about maybe five levels above you. Is it worth it? Is the life you want to live? You're causing trauma. You're causing contamination. And this is ongoing for generations. You've heard it. And last, I want my little -- go ahead. (MS. ROJAS' MO'OPUNA: No leasing. Please leave.) Yeah. So you hear, then. No lease. Clean up. Please leave. A 7-year-old. Mahalo.

Shelby Ronnberg

Give back the native land

Abigail Rose

The impact of military exercises on the land and residents is immeasurable, and yet they are given an extremely low lease on Hawaiian lands. Makua Valley cannot be used as it was traditionally because of unexploded munitions. O‘ahu is already overcrowded with military taking up housing, flying over residences, and polluting the island. I am against renewing these leases. We are not at war and there are many other unoccupied places in the continental USA.
Stop the destruction of the land and the rip-off of lands.

Abigail Rose

The army has been polluting our lands and water for too log. These leases should be ended of at least limited. The island of Kahoolawe is uninhabitable because of bombing. The land in Makua is unusable because of ordinances. Meanwhile thousands of working Kanaka Maoli are homeless. The land needs to be given back!

Abigail Rose

I'm here to say that I do notwant to see any extension of leases here. I'mstanding here with kanaka maoli as a local haole. Been here since 1962.I was around to see the destruction ofKaho'olawe, when that land, which was usable land, aland people lived on, was used as a bombing target,and bombed so much that it broke the water table,and the land is no longer something that can beinhabited. I'm a public school teacher, have beenteaching here for a long time. I hear all the timeabout things like the tanks at Red Hill. They'releaking. But the military says, well, it's only alittle leak. Of toxic fluids into our water table. You know, I've talked to people before,who live on the continent. We're a little, tiny doton the globe, if you look at us. We have a hugemilitary presence, Oahu especially. At any point intime, a third of the population is military. Thatshouldn't be happening. And since the military aremoving off base, now it's caused housing to go up. And I think when I look back at thehistory, that military presence has been here sincethe overthrow, never been invited, never beenwanted, and yet here we have this, as people aresaying, performative meeting asking how we feel. We don't want you here. I don't mind themilitary, but America is a huge continent. We're notAmericans. I'm an immigrant, so I can say I'm not anAmerican either. But I've looked at all the thingsthat have happened, and the Army, the military hasnever cleaned up the mess that they made.... I just, you know,I'm saying no to leases, and I stand with kanakamaoli in asking for their land back.

Alexa Rose

I am a resident of Florida. I am strongly opposed to the extension of military leases on the lands of Makua, Kahuku and Wahiawa. An extension of these leases will allow the military to further damage the natural resources of these areas, destroy habitats of Native Hawaiian plants and animals and continually disrupt the lives of the local community.

How can you seriously rent this land for $1? $1? Do you think the citizens of America will not notice?

Madelyn Rose

hello,Where can I find environmental impact statement regarding the armies use of 23,000 acres of Oahu land?
Sent from my iPhone

Susan Rosier

I know. I'll scoot up. So my name is Susan Rosier. I am currently for the last 12 years living on Moku o Keawe, the island of Hawai'i. Before that, I lived on Maui and raised my children over there and am very, very familiar with themilitary because Kaho'olawe bombing was a part of my family experience, with the ground shaking and the skies lit up and the bombs rocking the place. And the military didn't clean that up. And where I live here, up Pohakuloa, they're not cleaning that up either. And in your presentation, it was talked about how you take care of cultural sites and things like that. And all of that on paper sounds really, really good. You know, it's going to look impressive.

But the reality of it is that it doesn't happen. On Kaho'olawe, they put big circles around the heiau, and those were the targets. They made the circles so the nations from around the world could come and bomb the islands.

This is the land of aloha. I find it extremely, extremely offensive that the military is naming things that go around the world and kill people and maim people Hawaiian names. Stop that. Stop it.

I'm sure, Colonel, you would be able to relay that message up above, because that's, like, heart-wrenching. Obviously, our military doesn't understand what aloha really is.

So you were told tonight that this is not really a state of the United States. And we all know that by fact now, because documented original source documents have been shown to us, and we are all now very educated in knowing that you are here illegally and have been.

And when the military originally had all of those executive orders, there was a military crisis. There's not a military crisis today. There hasn't been a war since when? Korean War was the last declared war. Because after that, the military doesn't declare wars.

When somebody is sent off, like my son-in-law, God rest his soul, who went to war in the Gulf War, they called it a war. They sent him to the Gulf War, and he passed away. And his son couldn't even get the $10,000 that was promised for an education. His kids weren't even school age when he passed away.

During my last 30 seconds, I would say, you know, your best -- you're not going to do it, because you're only going to check the box, yes, we had the people talk. Check. That's what happens. But this problem is not going to go away. It's not going to go away, and everybody needs to get on the same page and talk about it.

You really shouldn't renew the leases. That is private land that was taken away by the insurgents, who Cleveland said were not legally in charge of the country. Therefore, their Republic of Hawaii had no right to sign over anything to you folks, and you folks had no right to take it.

And the statehood vote? We know that's a fraud, too, including the ballot. So take number 4, no action. I know you're not going to, but that's what everybody wants. And thank you very much. I'm upset.

Anjoli Roy

I am writing to second the following concerns about the extension of US military leases of Hawaiian lands:
As a community member, I do not support the extension of any of the leases. Secondarily, below is a list of suggestions I'd like to submit as part of the public scoping process on what should be included in the EIS.
1. The EIS on the Army Training Land Retention O'ahu should consider the impacts on Native Hawaiians, 'āina, and women & and girls.· Given the extreme importance of land in Hawaiian culture, what are the impacts on Native Hawaiians--socially, emotionally, and economically--of having these large tracts of land used for military training purposes without their consent? What cultural resources do these lands hold, and what have been the impacts of not having access to these cultural resources for so long?· What are the impacts on 'āina of military use for training purposes? What are the impacts on erosion, groundwater, air quality, endangered species and ecosystems, and contamination via hazardous materials such as waste and unexploded ordnance? Is the retention of these lands compatible with land use conservation mandates?· What are the impacts on women and girls of these training areas? Are women and girls in communities around military training areas and installations safe from sexual assault and trafficking? Do they have access to education, healthcare, and economic opportunities?
2. The EIS should explore not just the future impacts of retaining these lands, but should research and document the impacts already felt by the stakeholders mentioned above over the course of the last 65-year lease.
3. The EIS should explore the legality of Army use of these lands, when significant portions of the lands are Hawaiian Kingdom Crown & Government lands that were transferred due to the illegal overthrow and annexation of the Hawaiian Kingdom.
4. The EIS should--in addition to exploring the impacts of the outlined Alternatives 1, 2, and 3--also consider the opportunity cost of these alternatives. In other words, the EIS should consider the possible positive impacts of the "No Action Alternative."· What are the cultural services that could be provided by these lands if access for Native Hawaiians was free, unimpeded, and safe?· What are the ecosystem services provided by these lands?· What are the opportunities for education, stewardship, housing, or other uses to which these lands could be put?· What is the fair market value of these lands, and how does that compare with the $1 lease that the Army pays?
5. The Army has stated that the training lands remain essential to their mission. The EIS public scoping and draft commenting process should solicit input from community organizations about if and how these lands are essential to their own missions and visions for their communities.
To end, I'd like to say that I understand that training is critical to the DOD's Indo-Pacific strategy--especially the focus on "preparedness." However I do not support simply moving all the training to some other location, where the same negative impacts of training can be visited on another community and their land, whether those communities are inside or outside of the U.S. Rather, I think we need to rethink the Indo-Pacific strategy and the broader way that the U.S. sees its global role. The U.S. is not exceptional, and its interests do not carry more moral force than any other nation's interests. The U.S. should prioritize actual peace and coexistence, rather than practicing forward posturing that--rather than deterring threats--only contributes to a cycle of inciting adversaries, necessitating the buildup of more lethal force, and leaving the whole region in an increasing state of precarity.
Kelsey AmosXXX XXXX Ave. Apt.X.Honolulu, HI XXXXXXXX-XXX-XXXX

seconded by me, Anjoli Roy, XXX XXXX Street, Apartment XXX, Honolulu, HI XXXXX

Julia Ruch

I strongly oppose the extension of military leases on the land of Mākua, Kahuku, Wahiawā. Extending these leases will allow for the military to cause further damage to the natural resources of these areas, destroy the habitats of Native Hawaiian plants and animals, and continually disrupt the lives of the local community. The army has wrongfully leased these lands from the state for $1 since 1964. When the leases expire in 2029, the land should be immediately restored to the public.

Erin Rutherford

Hello, I was unable to attend the Zoom meetings on August 10 and 11th which reviewed the EIS and discussed the future leases at Kahuku, Kawailoa and Makua. I am submitting my comments of OPPOSITION to renewing the land leases for the US Army in writing. For centuries the American government and military has colonized, white-washed, oppressed, and abused the lands of Hawaii and the Hawaiian people. At what point is enough enough? The military has ample places for training in the mainland. Why would you continue to use land on one of the most sacred, precious places on earth? I'm sure there's an imperialist justification in there somewhere for why it must be this land and why being there really helps the Hawaiian people. The US military has experienced and committed one disaster after another during its abhorrent history. A 20 year war in Afghanistan showcases the most recent disaster. The army has a unique opportunity to save some face and do something that benefits the people and listens to what they want. I beg the US Army to please move out at the end of your lease. Go somewhere else where people actually want you there. Thank you, Erin

Alohilani Sabado

Hewa loa.

Mikeila Sahlstrom

Keep Hawaiian lands in Hawaiian hands.

Ryan-Lowary Sam Fong

I strongly OPPOSE the Army training land retention of Makua Valley, Kahuku and Kawailoa-Poamoho. As a resident of Waiʻanae, Oʻahu, having learned about how Makua Valley was obtained to begin with, how it was treated until a cease-fire order in the early 2000s, and knowing Pohakuloa is already retained, I see no need for the continued use of these lands here on Oʻahu for use. I read in the Star Advertiser that the Army is claiming that they saved 3 Native plants from extinction in Makua Valley, and to that I say what about all the rest that was destroyed before then? Saving 3 plants does not constitute as making up for the generational trauma, the destruction of the former village there, nor for the fact that the land was supposed to be given back in 2029 as agreed upon. The extension of the use of land for another 45 years means that my grandchildren, should they ever come about, will then also have to write up something similar to receive back a Valley that meant more than just "a convenient training area" to their ancestors, to their people, to their grandparent. You have Pohakuloa, is that not enough already? Stay true to your original agreement, and give back Makua Valley, Kahuku and Kawailoa-Poamoho.

Elisa Sanchez

Aloha,
My name is Elisa and I am a resident of California. I strongly oppose the extension of military leases on the lands of Mākua, Kahuku, and Wahiawā.
With the recent IPCC report, we must do what we can to preserve nature and ecological system that has been present on the island for thousands of years. An extension of these leases will allow the military to further damage the natural limited resources of the island.
The army has wrongfully leased this land for $1 since 1964. When the lease expires in 2029, the land should be immeasurable restored to the public.
Thank you,
Elisa Sanchez

Luz Sanchez

I oppose Army training land on Oahu.

Samantha Sanchez

Hi,
My name is Samantha Sanchez and I am a resident of Florida. I am strongly opposing the extension of the military lease on the lands of Makua, Kahuku, Wahiawa.
An extension of the lease will only allow for the military to further damage the the natural resources of these areas, and destroy the natural habitats of the Native Hawaiian plants and animals, and continually disruptive the lives of the local community.
The army has wrongfully leased these lands from the state for $1 since 1964. When the leases expire in 2029, this land should be immediately restored to the public.

Brittany Sandoval

I am strongly opposed to the extension of military leases on the lands of Mākua, Kahuku, and Wahiawā. An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals, and continually disrupt the lives of the local community. The army has wrongfully leased these lands from the state for $1 since 1964. When the lease expires in 2029, this land should immediately be returned to the public.

Kawai Santiago

"I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... This is illegally occupied land. I would like to submit the follow comments regarding the Army's upcoming Environmental Impact Statement, which proposes to retain up to 6,300 acres of land on Oʻahu for military training purposes. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawaiʻi, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawaiʻi has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawaiʻi courts have also acknowledged the state's constitutional duty to mālama ʻāina. The leasing of ʻāina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ʻāina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on Oʻahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ʻāina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the "fair treatment of all people". Fair treatment means "no group of people should bear a disproportionate share of the negative environmental consequences". The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ʻāina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. The EIS process currently considers a "no action alternative" as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Waiʻanae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawaiʻi: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawaiʻi residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these

communities. These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Waiʻanae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities. Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Waiʻanae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands. In the Ching vs. Case ruling, the court found the state to have a trust duty to "mālama ʻāina" and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using. These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through moʻolelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access. Environmental justice (EJ) as defined by the EPA requires "meaningful involvement" of impacted communities such that "decision makers will seek out and facilitate the involvement of those potentially affected." Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involve ment to Waiʻanae, Wahiawā, or Kahuku.

Natalie Santiago

Aloha e to whom it may concern,
I am writing with “aloha” to kindly ask that you return all illegally occupied aina in the Hawaiian Kingdom. No more “fear” or “fraud”.
It is time for healing and doing the right thing. A time for peace and unconditional love. A time for sustainability and equanimity. A time for “aloha aina” for we “all“ are aina.
Please know that if I, Kamehaikanaonalaninui, my family, ancestors and relatives have offended you ~ the United States Military forces, your family, ancestors, in thoughts, words, deeds or actions from the beginning if creation to the present time, then please forgive us as we forgive you, please take all negative blocks, energies and vibrations, cleanse and purify , cut and release and send to the light. And we are set free and It Is Done.
Malama pono,Kamehaikanaonalaninui
Sent from my iPhone

Nic Santos

Aloha,

I submit this testimony based on nearly 15 years of experience with NEPA through the Section 106 process as conducted in Guam. Since 2006, I personally wrote and was involved with organizations and government entities that submitted testimony (at one point, including over 10,000 comments), as well as reviewed and analyzed in response to the DoD realignment basing efforts in the Pacific, specifically the moving of Marine Corps troops from Okinawa to Guam for military mission training . I provide this background of experience as I witness in Hawai'i the proposed action by the Army to extend leases at Pōhakuloa, Kahuku, Kawailoa/Poamoho, and Mākua, and the responses at the virtual scoping meeting, all of which were in opposition.

I question a type of "real estate action" that folds the request for extension of these four leases into one proposed action. Why do not each of the public lands at Pōhakuloa, Kahuku, Kawailoa/Poamoho, and Mākua have separate and distinct access to the Section 106 process? Environmental impacts for each area must and should be outlined so that cumulative impacts on each of the lands over the 65-year period may be understood by the people for whom these lands are home. It is in this manner that communities would best be able to participate and comment in the EIS process. A community-based consultation on the cumulative impacts for each leased area would allow for more comprehensive analyses from those who live there and are the experts of the resources that are most vulnerable and continue to be threatened due to military actions in and on these lands.

Public participation in 2021 has evolved since the signing of the 1964 lease agreement encompassing the 30,000 acres of public land at Pōhakuloa, Kahuku, Kawailoa/Poamoho, and Mākua. How can this EIS process be more representative of a true and proper consultation with the native communities of this land? This might require looking back to 1964 and asking if consent and consultation by native communities for this 65-year lease was adequately arrived at in ways that were just and truly representative of what the impacts would be for the futures of Native Hawaiians and their lands. This proposed action, this real estate action is blanket action and it does not consider the gravity of cumulative military actions in each of these different lands over the 65-year period and beyond.

Lastly, for now, the alternatives to be analyzed in the EIS, described as "1) Full Retention, 2) Modified Retention, and 3) Minimum Retention and Access" dismisses, belittles and sterilizes the true impacts of these military actions on the communities asked to participate. How could these alternatives, and the EIS process itself, be better representative of options that acknowledge the livelihood of people, their families and the connection they have to their homelands? The analysis of environmental impacts on these lands must be a process that accounts for the people's experience. This is not just a matter of retaining full, modified or minimum continued access to these lands. This EIS process must consider indigenous worldviews that see how one action or even long-term action undoubtedly impacts the whole, and that such actions may not be in the best interest of the people and their environments, even in matters of defense.

Nic Santos

O'ahu & Guåhan

Sima Saoji

Demilitarize Hawaii

Michael Sarmiento

I understand that the Army is preparing an Environmental Impact Statement (EIS) for Army Training Land Retention at Kahuku Training Area (KTA), Kawailoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of Oʻahu. I oppose the renewal of these leases and ask that the Army take responsibility for the clean up of these areas and that the lands be returned to the communities in which they are found. The military has taken advantage of its position and has brought harm to these lands and our community. As someone who has grown up in Makaha listening to the bombs explode as a young child I now ask that you return these lands so that healing process can truly begin. Our community is ready to take on the responsibility of these places. My hope is that the Army can see the damage they have caused and will do the right things. We are a small island with finite resources. If the Army is truly the honorable organization they claim to be then they should do the most honorable thing and allow the leases to expire.

Taylor Saunders

Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good.

These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts.

The EIS process currently considers a “no action alternative” as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored.

Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the “fair treatment of all people”. Fair treatment means “no group of people should bear a disproportionate share of the negative environmental consequences”. The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world.

These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. In 1997, the CEQ produced a guide titled “Considering Cumulative Effects Under the National Environmental Policy Act” which provides a framework for advancing environmental impact analysis by addressing cumulative effects in either an environmental assessment (EA) or an environmental impact statement. The EIS should employ this framework in order to address the

cumulative effects of all related military activities, not just the proposed project.
US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities.
These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai‘anae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities.
Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Wai‘anae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands.
In the Ching vs. Case ruling, the court found the state to have a trust duty to “mālama ‘āina” and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using.
These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through mo‘olelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access.
Environmental justice (EJ) as defined by the EPA requires “meaningful involvement” of impacted communities such that “decision makers will seek out and facilitate the involvement of those potentially affected.” Given the immense pressures that the COVID-19 pandemic has placed on our

communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku.

August 11, 2021

Aloha,

My name is Kristi-Ann Say and I am a 4th generation Native Hawaiian resident of Wahiawā, Oʻahu. I am writing today to express my heavy opposition towards the extension of U.S. military leases on the lands of Kahuku, Mākua, and Wahiawā. By continuing to lease these 6,300 acres of land to the U.S. military, you are perpetuation the destruction of Hawaiʻi as a whole. I cannot say I understand the justification of the retention and usage of these lands by the U.S. military. I can only understand the perspective of my own. As Native Hawaiians we are people born from this ʻāina. Our connection to the land is unlike that of people who were transplanted here. To know that our land is being used for destruction, and the practice of destruction of others, is stripping us and our future generations of our identity as peaceful people that hold the life of our land above our own. To see military personnel swarming my hometown daily, to hear the gunshots from my house, to have the helicopters constantly fly overhead shaking my home and rattling my windows is a constant reminder of the cultural murder we are facing. It is already a struggle to be able to afford to live here, the place of my ancestors, so it is a slap in the face to know there are 6,300 acres of land being leased out to the U.S. military for a DOLLAR every 65 years. There is absolutely no benefit to the ʻāina nor the Hawaiian people with the military occupying our home for such a ridiculous price and reason. A Hawaiian proverb used constantly in our culture, and one I wish your eyes be opened to is, "i ka wā ma mua, i ka wā ma hope." Which roughly translates to " we look to the past to guide our future." In this case, we are seeing a repeat in history as we once saw our island of Kahoʻolawe used as a place for target practice for decades. A place sacred to Native Hawaiians was restricted from us, destroyed, and the pieces left for us to pick up continuing over thirty years later. It is time for the U.S. military to leave. It is but a dream for the military to clean up after themselves and leave as if they were never there. But that is impossible. Instead, it is time for the U.S. military to give us back our land so she can heal and be restored for our generations to come. Therefore, in the Environmental Impact Statement, I hope it will be taken into consideration that we, the Native Hawaiian people, are just as impacted as our ʻāina is with every bullet shot, every bomb set off, and every minute that the U.S. military spends occupying our land.

Mahalo

Devin Scanlan

I have seen the before and after pictures of military occupancy. The land being destroyed just to test weapons. The destruction to ocean life & environment. While I was in Hawaiian studies back home, it really shines a light on the negatives of Military occupancy that people and the media don't show.

Elena Schaef

My name is Elena Schaef and I'm writing to oppose the re-leasing of all US Army land in the state of Hawai'i.
The US military is currently using 30,000 acres of land in Hawaii. In addition, the US military is one of the biggest polluters and emitters of CO2 IN THE WORLD. This is directly contrary to all Hawai'in values of care and respect for our planet.
It's time to put the people, the animals, the plants, and the land of Hawai'i first and reject the violent and colonizing interests of the US military. You have an opportunity to refuse to re-lease these lands to the US military, and it is imperative that you take it. Do your part in protecting this beautiful place and its people.
Thank you for your service,Elena Schaef

Elena Schaef

Hello,
My name is Elena Schaef and I'm writing to oppose the re-leasing of all US Army land in the state of Hawaii. Hawaii is a thriving community of indigenous people and communities who care deeply about the islands and who have faced US military invasion and occupation in the past. These people have no desire to play any role in the US military's continuing policies of needless violence, military occupation, colonialism, and the support of human rights violations all over the world.
The US military is currently using 30,000 acres of land in Hawaii. In addition, the US military is one of the biggest polluters and emitters of CO2 IN THE WORLD. This is directly contrary to all Hawaiin values of care and respect for our planet. Return this sacred land to the people who know how to care for it best and leave this state and its people out of the US military's atrocities.
Sincerely,Elena Schaef

Daniel Schlieder

To who it may concern,

I‘m emailing you concerning the U.S. Army lease extension at Makua, Kahuku, and Wahiawa that is coming for renewal in 2029. This land has been leased for $1 since 1964. I‘m a firm supporter of the security of our nation and believe there is a balance to be had with military training here on these islands and the land that was previously in stewardship of the Hawaiian people.

I think we can all agree that at bare minimum if the lease of this land is extended, it should be leased at full market rate. The money can be allocated to fund environmental initiatives, the education system, healthcare, and mental health resources for the homeless population across Oahu and the Hawaiian Islands.

Thank you for your consideration

Daniel Schlieder MD, DDS

Phil Schlieder

Aloha. My name is Phil Schlieder in with my company Delphi Cinema. We work with our trusted media partners of common worldwide, which works with Department of Defense. And groups such as Lockheed Martin and General Dynamics. I'm all for international security and security of our country for the United States of America, but I'm calling in concerns to the US Army that has leased the public lands of Makua, Kahuku, and Wahiawa for $1 since 1964. Now I think anyone listening to this voicemail can understand that $1 is stolen land that is not appropriate. And I think we all realize that as as humans on this planet. And so I am calling, along with many, many other HAWAIIAN PEOPLE. And and people that live on these islands to either return the land back to its rightful owners and stewardship of the land that is not focused on bombing, shooting and dropping explosives in these areas, to clean up those areas and at very least pay market rate for that land per acre, which would give you given back to the people of Hawaii to support the education system to support roads and infrastructure and to build a prosperous prosperous Hawaii. And I think that's a very important thing. And anyone. Once again, whatever state, you're from wherever you are located in the United States of America. Yes, we do agree there is a balance between the US military and how we need to protect our nation and our security forces. But to do that, in accordance to what our country stands for which is for all the people and everyone that lives in the confines of this country. So I appreciate the time And I hope that you guys all do the right thing, whoever is in the position of leadership to move this forward $1 is once again very much stolen land.

Keith Scott

Aloha mai kākou,
My name is Keith Scott and I am a resident of O'ahu. I am firmly against the US military's occupation of the Makua Valley. Makua Valley is a very important cultural and historical site for native Hawaiians, and it belongs in Hawaiian hands and under the care of Hawaiian practitioners, and not the US military.
My family and I have had the opportunity to tour Makua Valley once. It was unbelievably lush and splendid. Underneath this veneer, however, was a very violent past. At multiple points, our tour was cut short or redirected because unexploded ordinance had been revealed. We were told that every time the life-giving rains descend on the once-lifegiving valley, it would reveal the dangers of unexploded shells launched over several decades into the valley. At one point, we even found an important native Hawaiian cultural site (a boulder that had clearly been used for some ritual and/or everyday use) had been blasted in half by a mortar shell. Even in this rich and verdant valley, spent shell casings and discarded bullets were scattered about. And the shocking thing was that we were only touring the well-trodden portions of the valley. The places where many people have come before and, presumably, the worst of the spent ordinance would have been long since removed. And yet I saw the valley in such a dismal shape. Imagine what it must look like deeper in the valley, where the army handlers don't let people go and where ordinance has been allowed to fester in the open. Clearly, the US military has failed in its promise to be "good stewards" of the 'aina. Far from it. They are a threat.
I think the most shocking and depressing part of the tour was at the end, when we were shown the amazing petroglyphs that ancient native Hawaiians had carved in the rock near the entrance to the valley. The carvings had somehow, almost inexplicably, survived the military occupation and were preserved. However, because they were behind barbed wire and cordoned off from the surrounding areas, few native Hawaiians could actually see them, let alone understand their cultural importance and historical significance. The US military, by occupying Makua Valley, is sequestering and hiding a key site of Hawaiian culture and history. This, as the Hawaiian people are desperately reaching to grasp their past, that was so violently ripped from them by the illegal occupation of their land.
It is at these times when one can deeply consider what the purpose of the military in Hawai'i actually is. If it truly is here in order to defend this land, then there is no other recourse but to leave the land that it has so dreadfully hurt. It is my sincere hope that the US military returns Makua Valley to its rightful owners, the Native Hawaiian people.
Best regards,Keith Scott

Shoen Scott

Aloha! My name is Shoen Scott and I am born and raised in Laie, Hawai'i my whole life. From a very young age I was taught that things that are out of our control have to be accepted. Here in my home I am to accept a foreign power that is not only squeezing the life out of our ecosystems but allowing entitled militia to feel they are above locals. But I am choosing the latter now that I am older and have more knowledge of my power. The military needs to give back the lands to the natives because of the abuse of the land that is so normalized to our aina. Military and welfare training includes bombing, shooting which is destroying our environment. Please hear our voices and give the land back to us locals. Help us repair the damage done to our land and be an example to other states that the military will heed our pleads. Mahalo for taking the time to read this.

Christopher Seals

They are obtaining entirely too much land! The land is limited and should be returned! They have more than enough space for training in the states they don't need Oahu also!!!or any of Hawai'i

Alexandria Seger

Hello!
My name is Alexandria Seger, I'm a US citizen, I live in Fort Myers, FL. I oppose the military getting the Hawaiian land renewed. They are there illegally and don't belong there. Citizens there don't feel safe earing constant gun shots and having bombs be tested out on their land. Please don't renew the use, find somewhere else to go.
Thank you,Alexandria Seger

Hannah Sennett

I am completely against the US military occupation of native Hawaiian land. Do not renew the lease. $1 in rent is absolutely shameful. Do better. Find another place to destroy.

Alika Seto

"Hello, my name is Jeremy Joseph Kamohonua Alika Seto and calling in regards to the occupation of the military on O'ahu's North Shore and I oppose extending any leases, land leases to any of the military on any of the islands, especially on the north shore of O'ahu. Thank you, have a nice day. "

Julia Seydel

Hello, my name is Julia and I am a resident of Portland Oregon. I'm writing to express my opposition to extending the lease of the lands of Mākua, Kahuku, and Wahiawā to the military. Extending the lease will allow further unjust damage to the natural resources of these areas, and continue the disruption to the lives of local communities.
The army has wrongfully leased these lands from the state for $1 since 1964. When the lease expires in 2029, the lands must be immediately restored to the public!
Sincerely, Julia

Sheila Shahbazi

Hi, my name is Sheila Shahbazi and I'm a resident of Los Angeles, California. I support indigenous people's rights around the world and that is why I am strongly opposed to the extension of military leases on the land of Makua, Kahuku, and Wahiawa. An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitat of Native Hawaiian plants and animals and continually disrupt the lives of the local community. The Army has wrongfully leased these lands from the state for $1 since 1964. When the leases expiring 2029, this land should be immediately restored to the public. Thank you.

Sheela Sharma

Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a “no action alternative” as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the “fair treatment of all people”. Fair treatment means “no group of people should bear a disproportionate share of the negative environmental consequences”. The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities. These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai‘anae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from

industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities. Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Waiʻanae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands. These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through moʻolelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access. Environmental justice (EJ) as defined by the EPA requires “meaningful involvement” of impacted communities such that “decision makers will seek out and facilitate the involvement of those potentially affected.” Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku.

Geoff Shaw

I oppose renewing the leases for further training activities, the Army is a poor steward for these lands with no accountability, they should immediately begin to clean up after themselves and cease training activities on stolen land. Give the Apology Bill some teeth and accept responsibilty.

Jocelyn shaw

Good Afternoon, All. So it has come to my attention that you all are unauthorized by the people's of the lands that you are invading to actively steal their lands for your self interests I would hope you would have more integrity then to fo something so heinous and intrusive and overwhelmingly disrespectful and yet unfortunately you have no sense of such things. I do hope you would come to the side of honor and do what is right and stay as far away from them as possible and yet it is well known that you all have never been able to act in such ways expect full resistance and full defense do better and have some semblance of decency could you thanks

Jacob Shearer

Aloha. My name is Jacob Shearer. I'm a resident of Kaimuki. I'm calling in opposition to the extension of military leases on Oahu. The largest reason for me is that I think it's unfair and disrespectful for the military to be allowed to lease so much land for so little money when kanaka still still don't have that kind of access to their own lands. I think that all of those extensive lands could be used for better purposes if they were put into the hands of Hawaiians. As far as the environmental assessment. I think that the public is aware of the degradation that occurs on those lands when they're used by the military. I think that an assessment should look thoroughly into the long term effects on native populations of plants and animals as well as into the effects on the water table. Really, I think there are a lot of things that would, that would show the detriment of the uses on those lands. Yes, so I oppose it. I do not think that those leases should be extended. Mahalo

The Army is preparing an Environmental Impact Statement (EIS) for Army Training Land Retention at Kahuku Training Area (KTA), Kawailoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of Oʻahu, in accordance with the requirements of the National Environmental Policy Act (NEPA), guided by Title 40 Code of Federal Regulations (C.F.R.) Parts 1500–1508, and Title 32 C.F.R. Part 651, and the Hawaiʻi Revised Statutes Chapter 343 and Hawaiʻi Administrative Rules Chapter 11-200.1, collectively referred to as the Hawaiʻi Environmental Policy Act (HEPA).

Devika Shenoy

The land belongs to the indigenous folx of Hawaii and it is to be respected. Using sacred land (or any land, for that matter) for military training purposes accelerates the destruction of the environment and worsens our journey to climate change. As a citizen of the U.S, it would be highly disappointing to see the US military continue to engage in such disrespectful behavior. If you continue to use their land for military training, your actions will reflect the US Military's continued efforts to impose neocolonialism, imperialism, and land destruction around the world. It is time to do better. Do not use this land for military purposes.

Elizabeth Sheppard

Dear State Officials of Hawai'i Department of Land Resources:
Please do not renew your lease to the U.S. Military on your native lands. This is a great opportunity to decrease our military footprint and divert our tax dollars from destruction to preservation of life on our threatened planet. We spend over half our federal budget on wars and military might, while people go hungry and suffer from natural disasters. This is not to mention our destruction of natural resources. Military might does not keep us safe. It impoverishes all of us. We must not engage in another race to war, but a race towards peace. Lets accept this challenge for peace. The beautiful land of Hawai'i with it's resourceful people is a wonderful place to begin.
Respectfully,
ELIZABETH SHEPPARD [redacted] Do good, love justice, and walk humbly with your God. Micah 6:8

Elise Sherrill

Hello, the land the Army is currently occupying for Army training land, rightfully belongs to Indigenous Hawaiians. Their land has been stolen and sold out from underneath them. Hawaii is a small paradise that belongs to the Hawaiian people. I am asking you to not retain the land. Allow the native people to care for it and keep this small ecological wonder safe.

Keolakawai Spencer Shimabukuro

Aloha kakou. Keolakawaigenko Spencer Shimabukuro ko inoa. No Wahiawa maiau. I'm a U.H. Hilo graduate and a current master'sstudent in linguistics at Nanzan University inNagoya, Japan. Born and raised in Wahiawa, I was woken upand put to sleep not by my mother, not by an alarmclock, but by the horrendous sounds of U.S. militaryaircrafts blasting their engines of war with thesounds of rapid machine weaponry at the crack ofdawn and at the dead of night. Many of us have become accustomed to theidea of impending war and doom on our once peacefulislands. We've become numb to the treatment of ourland as a commodity for predatory tourism and U.S.militarism. But not anymore. It is apparent that you believe that youwill be welcomed into this prolonged treatment ofour land, our ancestor, which amounts to penniesthrough meaningless environmental statements.However, the only acceptable environment statementis simple. You leave us. Only by the U.S. military leaving protectsthe fragile and delicate 'aina that has beenstripped of all cultural and spiritual value andsuppressed with a military stranglehold since theU.S. military-led overthrow in 1893. Leaving willbecome the starting point of healing the wounds andthe generational trauma that Hawaiians have been enduring throughout the illegal U.S. occupation of our islands. Indeed, there is no such thing as environmental militarism. There's nothing sustainable about military training fields. There is nothing forgivable to the continuing misuse of native lands. Furthermore, militarism goes against the express wishes of Native Hawaiian self- determination and our longing to live on the land at an affordable cost. Not leaving will only bring further nuclear contamination, further bombing, further desecration of sacred lands, further removal and dispossession of native remains and native people, further delusions of American cultural superiority, and most of all, further death around the world. In closing, we have not and never have and never will consent to the further destruction of our land. Let the leases expire or leave as soon as possible. Thank you for your time. Mahalo. And thank you so much to the ASL interpreters. Mahalo.

Thomas T. Shirai Jr.

But anyway, I'm here to testify. I have three students. I served in the Coast Guard, but I also have other feelings,cultural feeling, and stuff of that sort. And I know Colonel, because we have the Kawaihapai Airfield meetings of currently the lease section by DOT and stuff of that sort. So I know him already. And he knows me.

But if there's one point, just three basic -- some basic things. Number one, I think one of the biggest things that everybody in the Hawaiian community that said this. The lease of $1 for 65 years. And that's not only just the Army. It's the telescope on Mauna Kea and other things of that sort. That's one of the biggest things that everybody is angry about, you know.

And, Colonel, I'm going to share with you, although we're talking about the Makua, KTA, and Kawailoa, I want to tell you some things that some don't know; okay?

My 'ohana is from an ahupua'a called Kawaihapai. That's where the Dillingham Airfield is situated. And in 1940, through executive order, my 'ohana and others that were there had to leave. They were given -- they had to start all over from scratch. And I will also say this. They did for each parcel give some kind of compensation, but it was atake it or leave it.

But when World War II was supposed to be over, landowners not only at Kawaihapai, but all over, like Pohakuloa, that had Native Hawaiians residing there, and they -- they lived on the land and they own them, was supposed to be given back.

But at that time, they were very racially prejudice. Only Caucasian peoples, excuse my language, but haole people like the Morgan family got their land back, and the Hawaiian owners of such, they was turned over to what became Territory of Hawaii lands. From there, it became state lands.

That's -- that's one of another things that a lot of us that have deep ties at specific areas are very, very angry about. And our kupunas didn't want to go through that heartbreak, so they kept it quiet for us. And we had to learn and revive them when their time was passed. Okay? But I will tell you how you got Fort DeRussy and La Pietra. Because of Dillingham. They made a land swap using lands from Kawailoa and Pupukea to get Fort DeRussy with the Army. And because they gave a small parcel on Dillingham Airfield, now called Kawaihapai Airfield, because his son went to war, and he wanted -- that was the disclaimer. Rename the airfield from Mokuleia Field to Dillingham Field.

But many of us served that did almost the same thing, like myself. So that's my thing I have to share with you. Thank you, Trisha.

Thomas T. Shirai Jr.

Yeah. I understood -- I understood very much let everybody speak because they never have a chance yesterday. So I'm glad that they had a chance to say something. All I going do is just recap little bit, because I'm trying to make it as brief as possible. I'm going to talk about a specific training area we got in this. Yes, I am a decorated Coast Guardsman, a very decorated one for first -- for first responder search and rescue. If you go to uscg.mil, I'm one of 270 recipients of the Coast Guard medal, which is in the same category as a silver star and all those other high-ranking awards, so number 11th ranking medal. Okay. I have to say this. My family was one that originated where Dillingham Airfield is situated, Ahupua'a Kawaihapai. And in 1940 during World War II, an executive order took the land away -- not only there, but many places. And they had less than a month to start life all over from scratch. And some made it; some didn't. My family did, and that's the house I still reside, because my girlfriends work hard and knew what they had to do. Okay? After World War II, that was supposed to revert back to those landowners, like at Makua and Kawaihapai, where my family from. But instead, what happened was they were very racially prejudiced at that time. People like the Morgan Ranch got -- non- Hawaiians, haoles that had land on military installations that had been made, were given back their lands while the Hawaiian people, it was given to the Territory of Hawai'i and then later state of Hawai'i. And then it became recreational use, whereas my grandfather and his predecessors, that was all prime agriculture land. And so also, I have mixed feelings, because I served in the Coast Guard, and I didn't know nothing until after I graduated from high school and came back to Hawai'i. The biggest grip I have for being in solidarity is there needs to be a fairness. One dollar for 65 years is not right at all. You know, this also applies to the telescopes on Mauna Kea, you know. That already is -- you lit the fuse to all of us getting very and extremely angry. I want to talk about now for what -- for any more training area. In the 1940s, they had pillboxes going around the island as a shore defense. One of those shore defense was at Kawailoa, and it was at a very important heiau. Site No. 240 documented in Sites of Oahu by the Bishop Museum, Kahuku Weluwelu heiau. It is a navigation heiau and multi-purpose heiau. And they built a pillbox right up on that, because they thought was a pile of rocks. And I just throwing that out. It's documented. It's in Around Oahu by Ian Beckett. There's a picture of it. But I'm sure that the military since the 1940s have improved on that sort of aspect. So that's what I wanted to share about a specific area. And also, please, Colonel, because I serve on neighborhood board, got some bonfires at army beach, Kawaihapai army beach by the airfield, you know. Tell them they need to leave their baggage at home when they come to Hawai'i. We understand and appreciate they serving, but, please, you know, that is not right at all. And it gets brought up time and time again at the neighborhood board. So that's what I wanted to share. ... Okay. Mahalo. Good night.

Allison Shiyozaki

"Aloha. My name is Allison Shiyozaki, I'm a resident of Hilo on Moku o Keawe. I'm strongly opposed, strongly opposed to the extension of military leases on the lands of Makua, Kahuku, and Wahiawa. An extension of these leases will allow the military, the worst polluter in the world, to further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals and continually disrupt the lives of the local community. I don't see the military giving back. So army has wrongfully leased land from the state for $1 since 1964. When the lease is expiring 2029 this land should be immediately restored to the public. I also believe the military who so much of our budget should do their due diligence to spend part of that budget restoring those lands putting money towards clean up of the environmental damage that they have done. Again, I strongly oppose the extension of the leases to the military mahalo "

Alana Siaris

Aloha, my name is Alana Siaris and I am a resident of the Kalauao ahupuaʻa on Oʻahu island. I am writing to provide testimony against the continued Army training and land retention on Oʻahu. As a child of Hawaiʻi, I have seen first hand the disruptive and obtrusive presence of the military in Hawaiʻi. In 1893, Hawaiʻi was forcefully and illegally overthrown and taken by the United States of America. The ongoing and growing presence of the U.S. in Hawaiʻi continues to dispossess natives from their ancestral lands. I am strongly opposed to the extension of military leases on the lands of Mākua, Kahuku, and Wahiawā.

An extension of theses leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals, and continually disrupt the lives of the local community. The Army has wrongfully leased these lands from the state for $1 since 1964. When the leases expire in 2029, this land should be immediately restored to the public.

With the rate of homelessness on Oʻahu steadily rising, the threat of climate change more profound than ever, and the fight for human and indigenous rights around the world, it is time to reevaluate the need for these lands by the U.S. military, and the devastating impacts this kind of agreement has on the natural resources and citizens of this once sovereign nation. The decisions made today will impact the generations of Hawaiʻi for years to come. Mahalo me ke aloha.

Jennifer Silva

Our island of Oahu has sacrificed for too many years by allowing the military to lease these precious lands. The lands have not been cared for or respected the way our kupuna would have wanted. I would like to see the military clean up these leased lands before returning them to the communities they are in. Our communities need these lands and should be given the opportunity to use them. Please allow the leases for these lands the military have possessed to expire. It is the honorable thing to do.

Karla Silva-Park

For generations the military has had unlimited access, for a gross amount of money, to our native lands and have caused irreversible damage. I strongly oppose any lease to military whether compensated or not. It is time for the military to take responsibility for the damage caused and work to repair what has been done. Our land and our people have been victimized for far too long. The land my ʻohana and ancestors once had is gone, I refuse to let that happen to my keiki. It is our kuleana to protect and uplift our resources so that our community can begin to heal. Extending any lease will prohibit this from happening. It is time to return our lands.

Joseph K. Simpliciano Jr.

Dear Army Personnel, Aloha, I am a native Hawaiian and a retired infantryman. I firmly oppose the Army‘s retention of any "State" lands at Mākua, Kahuku, and Kawailoa-Poamoho, which is in the Stewardship of the State of Hawaii due to the unlawful and illegal overthrow of the Kingdom of Hawai'i. I also strongly support the "No Action Alternative" that would allow the three leases to expire and require the Army to comply with all lease terms that include the clean-up of these lands. I am also a lifelong resident of Wai'anae. The word Wai'anae means "water mullet" or "mullet water" the history of Wai'anae is that we were once the breadbasket of Oahu, but due to the theft of our water, we can no longer sustain ourselves. Our mountains are no longer green and teaming with wildlife. Our oceans are missing a plethora of native marine life due to the cut-off of stream water. Makua has 16 million gallons of water per day, which is more than enough to give back to our streams. The beachfront of the proposed Makua Alternative is flawed and should not be up for discussion because there is federally protected prehistoric tadpole shrimp in the area. Tadpole shrimp is a federally protected species, and this is throughout the United States. To have another federal entity not acknowledge this is puzzling. The History of Makua is also a concern as the Army has not completed its study on its impact on the wildlife that locals gather to eat. There has never been a study published, nor have there been any conservation efforts in conjunction with the State to protect the native species that call Makua's streams Caution-home. I have personally picked up casings from 50 cal to 7.62mm and 5.56mm. I have also picked up 5.56mm blanks used in training, which are visible on the beachside and dirt roads. The discussion about finding dunnage at Makua beach made its way to the Waianae Neighborhood Board on more than one occasion. I understand that the Military has readiness. Still, there are already areas in use that the Community does not have a problem with the Army using, such as Bellows for any beach exercises or maneuvering Additionally, Schofield has multiple ranges. Since there is no longer KoleKole pass, there is absolutely no reason this area isn't taken advantage of. The Wai'anae Community has been at the mercy of the Military since the World Wars. As noted in the Bishop Museum, Hawaiians had their titled lands stolen by the Military, and sometimes at gunpoint, Cultural heiaus were destroyed and used for target practice. The remnants still litter our coastline. The Wai'anae Community would like to have the beachfront back so that they can restore its natural beauty. they would like to implement traditional practices and teachings. They would also like to become stewards of the Streams, land, and ocean. It would only seem right to allow this to happen because the Military has broken so many promises and cannot use the Makua Valley as a range successfully. It is a waste of taxpayers' money to continue to operate this Range. ATI was created as a broad category to refer to all cultural resources significant to native, aboriginal, or local groups. These resources include, but are not limited to, landscapes, sacred sites, shrines, and "property[ies] of traditional religious and cultural importance" (PTRCIs) whether or not they have been formally evaluated for listing in the National Register of Historic Places. U.S. ARMY CORPS OF ENGINEERS, HONOLULU DISTRICT. Environmental Impact Study, July 2021.
Caution-http://oeqc2.doh.hawaii.gov/Doc_Library/2021-07-23-OA-EISPN-Army-Training-Land-Retention-on-Oahu.pdf PDF file. Pg. 3-4 These affiliations also illustrate how Native Hawaiian spirituality and religion are intertwined with the natural environment and woven into an intricate yet loosely defined relationship among the land, landforms, plants, water, ocean, sky (cosmology), mountains, and all things natural and supernatural. Please refer to the Hawaiian story of our creation. To the west of Farrington Highway lies the Muliwai. This State-owned land at Makua Military Reservation lies in the Kea'au aquifer system in Wai'anae hydrologic unit, with a sustainable yield of 16 million gallons per day. No public water wells are documented within one mile of the State-owned lands a MMR. Five wells were noted by the U.S. Geological Survey (USGS) within the State-owned lands. Due to their proximity to the shoreline, all of these wells likely have high salinity. U.S. ARMY CORPS OF ENGINEERS, HONOLULU DISTRICT. Environmental Impact Study, July 2021.
Caution-http://oeqc2.doh.hawaii.gov/Doc_Library/2021-07-23-OA-EISPN-Army-Training-Land-Retention-on-Oahu.pdf PDF file.Pg. 3-10 There is UXO on State-owned lands at MMR because of past military training activities that involved bombing, shelling, and small arms. UXO disposal on State-owned lands at MMR only happens when the Community finds it, and to include several tons of ordnance material has been collected. Army operations and access to the State-owned land are highly restricted to maintain safety (USACE-POH & USAG-HI, 2017c). Firebreak roads and fire suppression facilities, including a water tank, foam storage facility, and wet standpipe system, have been established (USARHAW, 2003). Police, fire, and medical services at KTA, Poamoho, and MMR, including on State-owned land, are provided by the U.S. Army and the Honolulu Police and Fire Departments. The Honolulu Police and Fire Departments service the City and County of Honolulu. U.S. ARMY CORPS OF ENGINEERS, HONOLULU DISTRICT. Environmental Impact Study, July 2021.
Caution-http://oeqc2.doh.hawaii.gov/Doc_Library/2021-07-23-OA-EISPN-Army-Training-Land-Retention-on-Oahu.pdf PDF file. Pg. 3-4 Pg 3-14 Please return areas of Makua to its lineal descendants as they have their paperwork from Kamehameha to show actual and legal ownership.
Mahalo,Joseph K. Simpliciano Jr.

Nicholas Smith

Hello,
I write regarding the proposed renewal of the US Army's 65-year lease of land on Wahiawā, Mākua and Kahuku that is used for military training.
The use of this land for military purposes will bring nothing but destruction to the land and waters of Hawaii. Immense destruction has been caused thus far, in part by the military's actions, to the sealife and bird species in Hawaii, which seem to constantly go extinct, the use of sacred sites as targets, such as Kaho'olawe and in Western O'ahu, as well as the ecosystem in general.
Please consider the impact this project will have.
Kind regards,Nicholas Smith

Samantha Snively

"I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... The U.S. military is occupying lands stolen in an illegal overthrow and occupation of a sovereign nation. The U.S. military has not stewarded these lands well while they were tenants, and have contributed to environmental destruction and degradation, as well as generations of community harm. Kanaka Maoli are best positioned to steward their own land. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a “no action alternative” as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the “fair treatment of all people”. Fair treatment means “no group of people should bear a disproportionate share of the negative environmental consequences”. The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai‘anae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in

the context of the broader environmental justice issues faced by these communities. Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Waiʻanae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands. In the Ching vs. Case ruling, the court found the state to have a trust duty to "mālama ʻāina" and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using. These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through moʻolelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access. Environmental justice (EJ) as defined by the EPA requires "meaningful involvement" of impacted communities such that "decision makers will seek out and facilitate the involvement of those potentially affected." Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku. The U.S. military also needs to pay today's fair market price for the lands they lease. Continuing to pay nominal lease prices encourages further environmental destruction. A price doesn't just reflect current value, it also sets expectations about behavior based on that value. We treat cheaply what we get cheaply. So if the lands are so valuable to the military, they need to be paying lease rates that reflect that value, not the $1 per parcel justified through illegal o ccupation.

ʻIlikea Snow

Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawaiʻi, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawaiʻi has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawaiʻi courts have also acknowledged the state's constitutional duty to mālama ʻāina. The leasing of ʻāina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ʻāina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on Oʻahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a "no action alternative" as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Waiʻanae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ʻāina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the "fair treatment of all people". Fair treatment means "no group of people should bear a disproportionate share of the negative environmental consequences". The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ʻāina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawaiʻi: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawaiʻi residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities. These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Waiʻanae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from

industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities. Environmental justice (EJ) as defined by the EPA requires "meaningful involvement" of impacted communities such that "decision makers will seek out and facilitate the involvement of those potentially affected." Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku. These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through moʻolelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access. In the Ching vs. Case ruling, the court found the state to have a trust duty to "mālama ʻāina" and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using. Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Waiʻanae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands.

Jess Sobocinski

Aloha. My name is Jess Sobocinski and I'm a resident of Hawaii and I strongly oppose the extension of the military leases on the lands of Makua, Kahuku, and Wahiawa. It is my belief that an extension of these leases will allow the military to further damage the natural resources of these areas. And destroy and disrupt the natural habitats of Native Hawaiian plants and animals and as well as disrupt the lives of the local community. These are things I think need to be heavily considered and closely examined as part of the environmental impact statement. My deepest wish is that when the leases expire in 2029 that's this land should be restored to the public and be available for public use for restoration and for conservation. Mahalo

Rachel Solís

Please Please consider giving Makua back to the people of Oahu. It's such a special place not only for its scenic beauty, but for its cultural significance and importance to local people. Oahu has very little open space left and putting this land back in the hands of Kama'aina would have huge impacts on recreation, housing and farming. Space is a major issue on this overpopulated island and having Makua back could allow us all to spread out a little, grow the food we need to become a more self sufficient island, help take the load off other areas that are way too densely populated.
Makua deserves to be used as more than a training ground for military personnel. Giving the lack of resources on an island, specifically LAND I hope the army will consider doing its training somewhere that land is not such a limited commodity.
Mahalo,Rachel Solís Sent from my iPhone

Ikaika Solomon

My name is Ikaika Solomon. I am a resident of Waianae. I am strongly opposed to the extension of a military lease on the land of Makua, Kahuku, and Wahiawa. An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats and Native Hawaiian plants and animals and continually disrupt the lives of the local community. The Army has wrongfully leased these lands on the state for $1 since 1964. When the lease expires in 2029 this land should be mainly restored to the public and all you * Europeans, go back to where the * you from * the haoles

Jincy Songer

Hello, my name is Jincy Songer and I am a resident of Tampa, FL. I am strongly opposed to the extension of military leases on the lands of Mākua, Kahuku, Wahiawā.
An extension of these leases would allow for further destruction of the natural environment, native species and land animals, and further disrupt the lives of the indigenous communities who are from the land.
The army has wrongfully leased these lands from the state since 1964. When the lease ends in 2029, the land should be immediately restored to the public. Thank you.

JoNelle Sood

Aloha! My name is JoNelle Sood. I'm Native Hawaiian born and raised in California. I'm writing to provide my feedback and saying the military should not renew their lease. As you've heard in the zoom meetings the feedback is synchronously no. It is documented and publicly announced by President Bill Clinton that Hawaii was illegally occupied. We saw with Kahoʻolawe that the military did not hold up their end of the bargain with regards to caring and restoring the land upon departure. There is history and evidence that the misuse of Hawaii lands are undeniably criminal. The land belongs to the community, for the families, for natural resources. Please return that land back to the natives so we can continue to thrive and educate not only our children but all the visitors and tourists that come to the land. It's time for the US to hear, respect, and act upon the many voices that are saying no. Mahalo, JoNelle Sent from Yahoo Mail for iPhone

Jasmine Soriano

This is unfair for the hawaiian native land that is already there. Occupation by military is not necessary.

Chays Souza

I cant even go swimming or diving without finding bullets and shells in mākua. And to know i cant freely access the valley because of your live ordanances is rediculous. You need to leave and take all your opala with you!

Phoebe Sprague

Aloha. My name is Phoebe Sprague and I'm a resident of New Jersey. The town of Manahawkin, and I am strongly opposed to the extension of military leases on the land of Makua, Kahuku, and Wahiawa. And I think that is absolutely ridiculous that you people take over this beautiful land to destroy it when it wasn't yours to begin with. Stop. End this now.

Phoebe Spague

Aloha. My name is Phoebe Spague and I'm a resident of Manahawkin, New Jersey, I am strongly opposed to the extension of military leases on the land of Makua, Kahuku, and Wahiawa. This is not okay to be destroying environmental areas in Hawaii, when it was not our land to begin I have family who lives in Hawaii and they do not deserve this treatment, nor do other Native people living there, or the environment or animals or anything that you're such doing--it is not our land. And you need to end this lease and go back to the United States, the actual United States--not somewhere that you call U.S.--Oh wait, a nice that also. Stay on the mainland. Mahalo

Mallory Spencer

This land does not belong to the military, but belongs to the indigenous people of Hawaii. Leasing it , especially for a measly $1, is thievery. The land was not given to the military, but was stolen by the military. Return the land.

Regan Spencer

To whom it may concern,
I write this email as my formal comment regarding the Environmental Impact Statement for Army Training Land Retention of State Lands at Kahuku Training Area, Poamoho Training Area, and Makua Military Reservation, Island of O'ahu, Hawai'i. As an aside, I question why the Submit a Formal Comment link is inactive, since the Federal Register surely has a legal obligation to accurately track the number of public comments on this issue.
But to the point. The U.S. Army has invited these public comments. The Army will present its EIS in hopes to push through this expedited lease renewal. EIS is a deeply ironic and brazenly bold term to use here. Testing explosives leaves quite an impact, does it not? I think the Army owes the truth to the American people, as they have voluntarily opened a public discussion with us about this issue. Military training and testing on O'ahu has caused not so much an impact but sheer devastation, desecration, and degradation. It has ripped apart the land, poisoned the ground, polluted the air, and violated the spirit of the Hawaiian people.
The Army are guests on this land. This fact is proven by the very fact that they LEASE the land. And for only a dollar, lease is a pretty strong word. Steal, rob, pilfer, loot. The American way. Look, you know it's wrong, even though I know you believe fundamentally in its necessity. That the ends justify the means. That we really do have the luxury of choosing a lesser evil. We do what we must to protect our own, yes? I know as a civilian I will never, ever have any idea about the specific advantages a mid-Pacific outpost does for our military. I know I could never speak to you on that level, to sway your opinion regarding a military situation. IF we are ONLY speaking about a military situation.
But it's more than that and no one can possibly refute that. It's an entire nation of people we've displaced, attacked, and oppressed for our own benefit. We approach security as a zero-sum game, when safety is neither zero-sum nor a game. You lose the heart of the American people when we can so clearly see the violence, pain, and damage upon which our power is built. You lose the ends that supposedly justified such means. Because it's no longer security and freedom, it's aggression and oppression. It's feeling safe in this life and facing the bitter, bloody truth in the next.
The Hawaiian people deserve freedom, as much as you or I. They deserve their country back. They deserve to have their land and resources returned to their stewardship, which is the only way the land will ever heal. They deserve our respect, honor, and love. They deserve our protection, and they deserve to protect themselves from us when our better angels have fallen behind our fear and greed.
You want security but you contribute to one of the most destabilizing global forces we face, environmental degradation. You value freedom but sacrifice morality for it.
Find another way. You've got to find a way to balance security and morality. Surely, SURELY, the "greatest" military this planet has ever seen could come up with a solution. Surely we have enough faith in our brightest minds, our strongest soldiers, our most patriotic leaders to come up with tomorrow's solution to today's mess. Humanity's answer to save our souls, not just our country.
I love my country, and I stand with Hawai'i, and I don't believe we have to choose between those.
Thank you for your time.Sincerely,Regan Spencer

Geraldine Spiegle

This is ethically wrong. The military has no right to extended their lease in Hawai'i while millions of Hawaiians are being forced to abandon their homeland. The military, the US Government, does not care for Hawaiians or their cultures, all they care about is land and power. Truly distasteful.

Nicole Squassoni

I am opposed to the military continuing to occupy this land and believe that it should be returned to the native people of Oahu.

Malika Steen

As an ally to native Hawaiians who are deserving of the right to autonomy over their historical and cultural lands, I am expressing dissent towards the extension of military leases on the lands of Mākua, Kahuku, Wahiawā. An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural resources of native Hawaiian plants and animals, and continually disrupt the lives of the local communities. The Army has wrongfully and immorally leased these lands from the state for $1 since 1964.

This display of thinly veiled colonialism and imperialist motive enables rampant overexploitation of native lands in the midst of environmental, public health, and human rights crises. Indigenous people and native Hawaiian communities bear the burdens of these harmful consequences with no commitment to actionable and sustainable accountability from the military forces causing them. I am strongly advocating for the land to be immediately restored to the public when the leases expire in the year 2029. Finally, I urge decision-makers to prioritize the sustainability of all life on Earth over short-lived monetary profit that only serves to benefit a select few at the expense of native Hawaiian communities.

Malika Steen

Aloha,
My name is Malika Steen and I am a resident of Los Angeles, California. As an ally to native Hawaiians who are deserving of the right to autonomy over their historical and cultural lands, I am contacting you to express dissent towards the extension of military leases on the lands of Mākua, Kahuku, Wahiawā. An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural resources of native Hawaiian plants and animals, and continually disrupt the lives of the local communities. The Army has wrongfully and immorally leased these lands from the state for $1 since 1964. This display of thinly veiled colonialism and imperialist motive enables the rampant overexploitation of native lands in the midst of environmental, public health, and human rights crises. Indigenous people and native Hawaiian communities bear the burdens of these harmful consequences with no commitment to actionable and sustainable accountability from the military forces causing them. I am strongly advocating for the land to be immediately restored to the public when the leases expire in the year 2029. Finally, I urge decision-makers to prioritize the sustainability of all life on Earth over short-lived industrial profit that only serves to benefit a select few at the expense of native Hawaiian communities. Sincerely, Malika Steen

A.L. Steiner

As you know, the leases on 23,000 acres at Pohakuloa Training Area on the Big Island, 4,370 acres at the Kawailoa/ Poamoho Training Area, 1,170 acres at the Kahuku Training Area and 760 acres at the Makua Military Reservation were given away for free, with the state charging only $1 for each parcel for 65 years!

The three areas on Oahu are one-third of the 18,060 federal and state lands used for military training on the island, while the 23,000 acres at Pohakuloa are 17% of the 133,000 acres that comprise the largest military training area in the state and in the Pacific region. Residents are subjected to a daily dose of the U.S. military build-up for what the Indo-Pacific command is calling "our enemy China." We know what happens when the U.S. tries to resolve disputes through military action millions of persons dead and wounded, including tens of thousands of U.S. military, as evidenced by the wars in Viet Nam, Afghanistan, Iraq and Syria.

Ultimately disputes with countries are resolved not by military action, but by dialogue, so the US military MUST STOP SPENDING trillions on weapons that ultimately do not solve the situation. Hawai'i should be known as an area of peace and dialogue using the Hawaiian technique of "ho'oponopono" rather than as a base for projecting the U.S. propensity for killing over using diplomacy to reduce tensions with other countries.

A first necessary step is to reduce the U.S. military footprint in Hawaii by the State of Hawai'i refusing to re-lease 30,000 acres currently used by the U.S. military. Thank you, in advance, for your consideration in cancelling this inequitable use of our lands NOW and forever.

Matthew Stelmach

Please evaluate the impact of current and future invasive species introduced to O'ahu as a result of the use of these training areas. In particular the introduction of Devil weed (Chromolaena odorata) https://www.oahuisc.org/devil-weed/ and similar future introductions. Please include minimization measures to reduce the likelihood of future introductions.

megan stephenson

As a former resident of Hawaii and a US citizen that cares about the environment, I strongly oppose the Army Training Land Retention at Kahuku Training Area (KTA), Kawailoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O‘ahu. The land is illegally occupied, as admitted in the Apology Resolution, and the military training is causing irreversible destruction to the land, which should be used for Native Hawaiian homestead land anyway. I ask that the military withdraws from all of these training areas and return the land to the Department of Hawaiian Homelands.

Judith Stetson

I live in Woods Hole on Cape Cod in Massachusetts where an active military base sits on top of our sole source aquifer. The military has long objected to our efforts to get it to stop polluting and poisoning our water supply. "Civilian Encroachment" it called our efforts even when we publicized the scientific studies to prove damage it was causing. I respectfully urge you not to renew the lease of your land for military use. Sincerely, Judith Stetson

Jessica Stevenson

I am strongly opposed to the extension of military leases on the lands of Mäkua, Kahuku, and Wahiawä. An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the habitats of Native Hawaiian plants and animals, and continually disrupt the lives of the local community. The military has wrongfully leased these lands since 1964. When the leases expire in 2029, this land should immediately be restored to the public. Native Hawaiians deserve their land back. They deserve to be able to care for and cultivate the land that rightfully belongs to them.
Jessica StevensonMillcreek, Utah

Sam Stiles

Hello there,I am emailing to let you know that I oppose the extension of military leases on the lands Mākua, Kahuka, Wahiawā. An extension of these leases will allow the military to further destroy the natural habitats of Native Hawaiian plants and animals, damage the natural resources of these areas, and continually disrupt the lives of the local community. The army has wrongfully leased these lands from the states for one dollar since 1964. When the lease expires in 2029, this land should immediately be restored to the public. Thank you for your time,Sam

Robert Stiver

I endorse and support unreservedly the terrifically on-point oped by Ann Wright (Caution-https://printreplica.staradvertiser.com?selDate=20210808&goTo=E03&artid=3 < Caution-https://printreplica.staradvertiser.com/?selDate=20210808&goTo=E03&artid=3 >) .
COL/Ms. Wright is a national/international treasure with a vision that is transcendent and is always searching for a way to peace and justice across many sectors and spheres of human endeavor.
I want the military's footprint -- wide, deep, dangerous, far too often belligerent -- to be drawn down across the globe, including training areas in Hawaii that merely perpetuate its reach. I agree with COL Wright that, no matter what the price ($1 per parcel or ...!), PTA et al should not be acceptable to or agreed to by the state of Hawaii, and the lands should be returned to (land-short) Hawaii and its people.
We, the people, don't need and should not have an MIC (Military-Industrial Complex) that was warned against by, principally, DDEisenhower in the 1950s, but here we are, still.... We need a Peace-of-the-People Complex, led by a fully established, funded, and professionally managed Department of Peace at the cabinet level of the executive branch, WASHDC! COL Wright's prescription is one plank on the way to that elegant and essential goal!
Thank you for this opportunity to comment.
Robert H. Stiver [redacted]

Robert Stiver

Please allow me to add one wordset to my comment/testimony. It is bolded below:
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Robert H. Stiver, [redacted]
On Sun, Aug 8, 2021 at 4:55 PM Robert H Stiver > wrote:I endorse and support unreservedly the terrifically on-point oped by Ann Wright (Caution-https://printreplica.staradvertiser.com?selDate=20210808&goTo=E03&artid=3 < Caution-https://printreplica.staradvertiser.com/?selDate=20210808&goTo=E03&artid=3 >) .
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Melanie Stockwell

Stop the occupation of Hawai'i

Linsey Stokes

Hello,
My name is Linsey Stokes and I am writing to say that I strongly oppose the occupation of the United States military on Hawaiian land. Native Hawaiians deserve the right to their native homeland, and it is disgusting and despicable that the United States thinks it has any claim to their land at all. Native Hawaiians are being forced into poverty and have only a fraction of their rightful land that the United States has stolen. The military disrespects, bombs, and destroys the land and the creatures that live there, and it does not have the right to control any of the land of Hawaii. Remove yourselves from their land immediately. - Linsey Stokes

Taylor Stokes

Find & use land in other states. Oahu is crowded, give some land back!
Thank you

MELE STOKESBERRY

When the leases end in 2029, the State of Hawai'i should not re-lease these lands no matter what the amount the U.S. military offers.

They have been given away for free for 65 years! The leases on 23,000 acres at Pohakuloa Training Area on the Big Island, 4,370 acres at the Kawailoa/ Poamoho Training Area, 1,170 acres at the Kahuku Training Area and 760 acres at the Makua Military Reservation should be returned to Hawai'i.

Then, the military can negotiate fair and square with the people of Hawai'i, and we citizens of Hawai'i can be a partner in deciding on the uses of these extensive lands, which, by the way, are going to need a lot of clean up so the military had better start now.

Mele Stokesberry

to usarmy.hawaii.nepa@mail.mil re Testimony on EIS scoping in re the re-leasing of military lands from the State of Hawai'i When the leases end in 2029, the State of Hawai'i should not re-lease these lands no matter what the amount the U.S. military offers. They have been given away for free for 65 years! The leases on 23,000 acres at Pohakuloa Training Area on the Big Island, 4,370 acres at the Kawailoa/ Poamoho Training Area, 1,170 acres at the Kahuku Training Area and 760 acres at the Makua Military Reservation should be returned to Hawai'i. Then, the military can negotiate fair and square with the people of Hawai'i, and we citizens of Hawai'i can be a partner in deciding on the uses of these extensive lands, which, by the way, are going to need a lot of clean up from depleted uranium and other toxics on these battered and misused lands. Mele Stokesberry [redacted]

Mariette Strauss

"I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... These lands should be rightfully returned to the Hawaiian people Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a “no action alternative” as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the “fair treatment of all people”. Fair treatment means “no group of people should bear a disproportionate share of the negative environmental consequences”. The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities. These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai‘anae, and Wahiawā already

disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities. Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Waiʻanae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands. In the Ching vs. Case ruling, the court found the state to have a trust duty to "mālama ʻāina" and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using. These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through moʻolelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access. Environmental justice (EJ) as defined by the EPA requires "meaningful involvement" of impacted communities such that "decision makers will seek out and facilitate the involvement of those potentially affected." Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku.

Hannah Streeter

Aloha. My name is Hannah Streeter and I very strongly oppose the extention of military leases on the lands of Mākua, Kahuku, Wahiawā. Extending these leases only serves to damage the beautiful habitat of Hawaii, destroying ecosystem and culture alike. The army has wrongfully leased these lands for $1 since 1964, denying both land and compensation to the local population. In 2029 when the leases expire the land should be immediately restored to the public. I hope that you do so, and I hope it isn't too late to preserve the beautiful Hawaiian ecosystems that this occupation of the area and training exercises have damaged.

Hal Strough

Hello,
Please discontinue the lease of land to the military.

Greta Stuart

Give Hawaiian land back to the Native Hawaiians!! It is disgusting that the military will spend billions of dollars on gear and weapons but will rent their testing land for ONE DOLLAR? What a slap in the face and a huge injustice to Hawaiians. Do better! Your people are very displeased with you!

Josiah Stuart

I am opposed to the extension of military leases on the lands of Mákua, Kahuku, Wahiawā.
An extension of the leases will allow and contribute to the military's further damage of the natural resources of these areas, destroy the natural habitats of Native Hawaiians plants and animals, and continually disrupt the lives of the local community.
The army has wrongfully leased these lands from the state for $1 since 1964. When leases expire in 2029, this land should be immediately restored to the public.

Greg Sullivan

The US military needs to leave the Hawaiian lands to the Hawaiian people. Get off the land

Alisha Summers

I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... an extension of these leases will further allow the following: 1) the alienation of Kānaka Maoli from their ancestral lands; 2) the continued degradation of natural resources and ecosystems of these areas; and 3) the disruption of local communities. The military impacts the land & communities beyond the parcel boundaries which the military occupies. The EIS must address impacts throughout the watershed and should look at how watershed health can be restored through the "no action" alternative. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good.

These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts.

The EIS process currently considers a “no action alternative” as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored.

Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the “fair treatment of all people”. Fair treatment means “no group of people should bear a disproportionate share of the negative environmental consequences”. The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world.

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acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. In 1997, the CEQ produced a guide titled "Considering Cumulative Effects Under the National Environmental Policy Act" which provides a framework for advancing environmental impact analysis by addressing cumulative effects in either an environmental assessment (EA) or an environmental impact statement. The EIS should employ this framework in order to address the cumulative effects of all related military activities, not just the proposed project.

US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities.

These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai‘anae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities.

Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Wai‘anae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands.

In the Ching vs. Case ruling, the court found the state to have a trust duty to "mālama ‘āina" and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using.

These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through mo‘olelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS

should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access.
Environmental justice (EJ) as defined by the EPA requires “meaningful involvement” of impacted communities such that “decision makers will seek out and facilitate the involvement of those potentially affected.” Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku. The military disregards indigenous people wherever they go. All of the testimonies I heard from the EIS public scoping days were opposed to the re-leasing of these lands. This is an opportunity to start addressing the wrongs and start to make steps to do what is right, what is ethical. As an asian/white settler, and as someone who was born and raised in Hawaiʻi I acknowledge that this land belongs to Kānaka Maoli. The military is not entitled to this land and should return the land to the Hawaiian people.

Matthew Swalinkavich

I hear the bombing when with my family in Waimea. Depleted uranium continues to threaten residents. Fresh water lens is being drained and compromised by the military prioritizing use. The military presence absolutely jeopardizes residents of Hawai'i. Makes us a target. Distorts our economy, driving prices up for locals. Pollutes environment (US military is a top polluter entity). GET LOST. Stop stealing land. $1 is a joke- Hawai'i is sacred, irreplaceable, home to endemic species, unique culture, and indigenous lives. US Army directly adversely impacts all of these top valued expressions of life. BEAT IT!!!

L Swart

In regards to the continued use of the 6000 acres you use to conduct training excercises...I would ask not only that this activity is ceased and most importantly, that you spend the next 8 years cleaning the entire region to ensure that in the future, no citizens are harm by unexploded ordinance. Thank youL Swart

Amanda T

Hi!
My name is Amanda and I am a resident of New York. I am strongly opposed to the extension of the military leases on the lands of Mākua, Kahuku, Wahiawā.
An extension of these leases will let the military further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals, and continually disrupt the lives of the local community.
The army has wrongfully leased these lands from the state for $1 since 1964. When the lease expires in 2029, the land should be immediately restored to the public.
It is 2021. Do better.
Kindly,a concerned resident

Tanaka

"Hello, my name is [unintelligible] Tanaka and I would like to make a statement that I am against the renewed lease for the Army of Hawaiian land specifically Makua, Kahuku, and Wahiawa. And I think that it should be returned to the Hawaiian people. And I think that it should be evaluated for its environmental impact, that it's had and that's what I believe should happen. Thank you very much. Mahalo "

Drew Tanda

I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... It displaces and desecrates Hawaiian lands and Hawaiians themselves. Give the land back! Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state's constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good.

These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts.

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Samantha Makahi Tanuvasa

Aloha. My name is Samantha Makahi Tanuvasa. I'm a resident of Eva, Oahu and I strongly oppose the extension of military leases on the island on the land of Makua, Kahuku, and Wahiawa. An extension of these leases will allow the military to further damage the natural resources of these areas, destroying the natural habitat of Native Hawaiian plants and animals and continually disrupt the lives of the local community. The Army has wrongfully leased these lands for an unreasonable amount of $1 since 1964 when the lease is expiring 2029, the land should be immediately restored to the public. Mahalo

Jordyn Taylor

Hi,
I am strongly opposed to extension of military leases on the lands of Mākua, Kakuku, Wahawā. An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitat of native Hawaiian plants, and continually disrupt the lives of the local community.
The army has wrongfully leased these lands from the state since 1964. When these leases expire in 2029, this land should be immediately restored to the public.
Jordyn Taylor

June Taylor

Return lands to indigenous Hawaiians.

Kelsey Taylor

We are at a global tipping point. The actions we take right now can ensure a better future. Alternatively, we can ensure our own demise. I firmly believe that expanding the military leases on the lands of Mākua, Kahuku, and Wahiawā will contribute to that demise.

An extension of these leases will allow the military to further damage natural resources. It will destroy the habitats of native Hawaiian plants and animals, both of which are crucial to the ecosystem. This will also continue to disrupt the lives of the local communities.

The Army has wrongfully leased the land from the state for $1 since 1964. When the lease is up in 2029, this land should be immediately restored to the public.

Stop the endless damage to our planet and native Hawaii. The natives of this land do not deserve to endure the trauma of the US military continuing to bomb their land for sport. This is contributing the destruction of our planet and it must end. Do the right thing. We will all be watching.

Renee Tedder

I opposed the continued occupation of Hawaii and the renewal of the military's lease. The continued use/testing of bombs in the area is detrimental to the sensitive environment as well as affecting the indigenous populations. The contracts do not even benefit the locals monetarily as the lease fee is almost non existent. So this is only a harm to the environment and community. Hawaii has a unique and biologically significant flora and fauna population that is certainly impacted by noise pollution from bombing and military activity as well as the actual physical effects of destroyed ecosystems. This is unacceptable. Sacred places to indigenous people are also being affected by this continued occupation and it can not continue in modern day. Please stop destroying the planet by attacking fragile ecosystems and destroying native lands.

Christopher Telomen

Aloha. My name is Christopher Telomen and I'm a former resident of Oahu. I attended UH Manoa for five years. I currently live in California. I travel back and forth frequently to visit friends and family. I'm strongly opposed to the extension of military leases on the lands of Makua, Kahuku and Wahiawa. An extension of these leases would allow the military to further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals and continuously disrupt the lives of a local community. The Army has wrongfully leased these lands from the state for $1 since 1964. Upon the leases expiring 2029, this land should be immediately restored to the public. Thank you. Have a great evening.

Arianna Terlitsky

Aloha,

My name is Arianna Terlitsky- I am a resident of Erie, PA. I am strongly opposed to the extension of military leases on the lands of Makua, Kahuku, Wahiawa.

Extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals, and continually disrupt the lives of the local community. In this time of climate change it is important to protect our environments and encourage biodiversity. And one of the best ways to do so is to give land back to those native to it so they may lead us on the best practices to save and nurture it.

The Army has wrongfully leased this lands from the state for only one dollar since 1964. When the leases expire in 2029, this land should immediately be returned to the public.

Hannah Thao

Hello,
My name is Hannah Thao. I am a resident of El Cajon, California, and I strongly oppose to the extension of military leases on the lands of Mākua, Kahuku, and Wahiawā.
An extension of these leases will allow the military to further damage the natural resources of these areas. As well as the natural habitats of Native Hawaiian plants and fauna. The occupation of the military continually disrupts the lives of the local community.
The Army has wrongfully leased these lands from the state for $1 since 1964. When the leases expire in 2029, this land should be immediately restored to the public.
Thank you for your time,
Hannah Thao

Santwan Thomas

DEOCCUPY HAWAII!

Steven Thomas

Aloha Mai Kakou,

‘O wau ‘o Steven Nāwai‘awa‘awaakaua Thomas,

Aloha Everyone,

I am Steven Nāwai‘awa‘awaakaua Thomas.

I am descended from through the line of King Līloa and the progenitors of the House of Keawe. I have lived in Central O‘ahu my entire life and I have experienced the colonization of mind and culture.

My kupuna have been made to accept the criminal act of the stealing of our country by your country in "violation of treaties and of international law" as stated in the Apology Bill of 1993 (Public Law 103-150).

Subsequently, we have been made to accept the so-called "necessity" of leasing thousands of acres of our land for military training purposes.

I say enough already. Go blow up your own country. Stop killing and desecrating mine.

I have been in Makua Valley. The mana of our ancestors is still there and still very strong but the ‘āina is crying out. Crying out for me to do something.... say SOMETHING!

But I fear this is merely a formality and the military/government machine will do whatever they want anyway.

I‘ve heard the word "compromise" come up with regard to similar land lease issues in the past here in Hawaii, but I‘ve learned that it usually results in some kind of a token offer in return for continuing on with the originally planned use... most times, our people are outnumbered by those who have absolutely no knowledge of what they‘re doing to the land.

So again, I would urge you to take your military training back to your country.

My people still have a chance to resuscitate this ‘āina, and we are the only ones who inherently know how to do this. It‘s in our bones. But....

America

"He ali‘i ka ‘āina, he kauā he kanaka"

The land is chief, the people are the servants
Mahalo

Summer-Solstice Thomas

This land belongs to Native Hawaiians, not the US army. Continuing to occupy this land only perpetuates settler colonialism and its associated harm and violence. The US military should either pay the millions of dollars this land is worth (to the local government or in the form of social programs and reparations to local peoples) or get out of Hawaii. Preferably, the US military can just get out of Hawaii--that land does not belong to the US, or at least it shouldn't. Americans stole it from indigenous peoples and in this modern era we should be able to recognize that and do what is right. Leave Hawaii!!

Kelsey Thornberry

I strongly oppose the future use of these lands and waters by the military and I believe it is past time for this land to be relinquished back to the community. I will never forget the summer of 2016 when we were camping and swimming at Makua and my cousins who were diving discovered an unexploded ordnance. A team was sent out to detonate the device. The loud explosion and dead marine life left floating is an image that will always be burned into my mind. It is time for the Military to allow our lands and waters to rest and heal.

Carol Titcomb

"I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... They don‘t belong to the Army. Today is the birthday of our last Queen, who was treated dismissively because she was a Native Hawaiian and a woman, overthrown by a cabal of Missionary descendants eager to cast off the Native inhabitants and annex to the United States in order to wrest control of our lands. The overthrow was illegal and recognized as such. It is high time that things were set to right. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. The EIS process currently considers a “no action alternative” as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the “fair treatment of all people”. Fair treatment means “no group of people should bear a disproportionate share of the negative environmental consequences”. The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities. These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai‘anae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically

privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities. Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Waiʻanae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands.

John Tittle

My objection to the contract renewal lies in the environmental impacts which include: the destruction of ecosystems/ protected species and the usage of solvents, fuels, explosives, chemical weapons, heavy metals, radioactive substances. Large scale construction has obviously also had a negative impact on this land. Being that 5% of O'ahu land is owned by the military, one would think they would pay for it at a reasonable price, thereby using that money to assist with the obvious issues related to housing and hunger that affect this island.

Tlaloc Tokuda

i would like an independent body monitoring the comments mailed in. Having the military as guardians of letters/emails on what we think of the military is like the fox guarding the hen house and it seems less transparent. Sending feedback to the military doesn't brood any confidence for a free and uncensored community process. So i think letters should be sent to an independent body. I say NO to extending military leased land on Hawaii. This is a bad idea. The military has more than its fair share of land in Hawaii and i know what the Hawaiian monarchs thought (bayonet diplomacy) of the military and i know they are rolling over in their graves with the amount of land the military already controls. A prime example is Kaho'olawe. The military used it as a bombing site and they still haven't cleaned up the ordnances in all these years - all we get is military promises but little action! The army brings death and destruction in many forms. Civil Beat reported: "U.S. military bases in Hawaii dumped more thanhalf a million pounds of nitrate compounds — toxic chemicals commonly found in wastewater treatment plants, fertilizers and explosives — into the ocean in 2019". Then there's the Navy's Red Hill fuel tank that leaked 27,000 gallons of jet fuel and a quick cover-up followed. Capt. Mike Williamson said shortly after the spill "I have high degree of confidence that petroleum products from this incident have not migrated from the Red Hill tank facility towards the Red Hill well aquifer," However the Honolulu Board of Water Supply said the contamination did in fact hit the aquifer. I could give many more examples but i don't want to waste my time or effort sending info to the military which has little transparency and acts in its own self interest. I think its a bad idea to lend, lease, give any Hawaiian land to the military anymore!!! tlaloc tokudaKailua Kona, HI 96740

Michael Tom

"I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... Of the following: Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state's constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a "no action alternative" as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the "fair treatment of all people". Fair treatment means "no group of people should bear a disproportionate share of the negative environmental consequences". The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities. These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai‘anae, and Wahiawā already

disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities. Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Waiʻanae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands. In the Ching vs. Case ruling, the court found the state to have a trust duty to "mālama ʻāina" and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using. These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through moʻolelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access. Environmental justice (EJ) as defined by the EPA requires "meaningful involvement" of impacted communities such that "decision makers will seek out and facilitate the involvement of those potentially affected." Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku.

Melissa Tomlinson

Aloha. My name is Melissa Tomlinson and I'm calling from Lafayette, California to give testimony to oppose extending military leases in Makua, Kahuku, and Wahiawa--oh that was a tongue twister. Wahiawa. Anyway, Yes. Please do not extend leases. It's like grotesque already enough, that these lands have been leased to the military. That it's been done for the last 55 years for the amount of a dollar. I mean, it just, that is ridiculous. But in general, that kanaka maoli native Hawaiians You know, are the most displaced, houseless population on islands. Throughout specifically Oahu, that Hawaiian homes, you know, I mean, just in and the destruction that's happening from the military to the land to the environment, it's atrocious. So, Please, please do not extend these leases to the military. Thank you. Mahalo.

Hokulani Topping

Save Hawai‘i

Juana Torres

I am strongly opposed to the extension of military leases to U.S. Army on Kahuku, Makua and W'ahiawa. These lands should be rightfully restored to the public.
The U.S. military has wrongfully leased these lands from the state for $1 since 1964. The exploitation and destruction of Hawaii's natural resources and the desecration of sacred lands must end.

Dana Torrico

My name is Dana I am a resident of Arizona and I strongly opposed to the extension of military leases on the lands of Mākua, Kahuku, Wahiawā. An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of native Hawaiian plants and animals, and naturally and continually disrupt the lives of the local community. The army has wrongfully leased these lands from the state for a dollar since 1964. When these leases expire in 2029 this land should immediately be restored to the public.

Emily Townley

Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good.

US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities.

These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai‘anae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities.

Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Wai‘anae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands.

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Mickey Tran

Give Hawaii back their land! Remove military stations for training!!!

Carolyn Treadway

Dear Department of Land and Natural Resources:
Please do NOT re-lease land to the US Military. Diplomacy, not militarism, will help to save our planet. Military bases risk not only land but all the life on this beloved planet. Do NOT lease land to the military no matter what is offered financially.
Most sincerely,
Carolyn TreadwayWashington State

Samantha Trevino

The United State's military has long used the island of O'ahu for military training and usage, taking up space in the lands meant for the Hawai'ian citizens and native Hawai'ian people. This, in addition to the worsening climate conditions, will have an devastating effect on the O'ahu island, the environment, and its people. Please, consider not renewing the contract for military use and leave the land to it's original keepers, the native people of Hawai'i.

Jenny Trollman

I oppose renewing the lease to the US Army. I fully support giving Hawaiian land back to native people. Our Beautiful Earth is not our playground for war, it is our home.

Ashley Trotter

The state should NOT lease out the land to the U.S. Army. This land is being destroyed daily with the weapons they use. The land can be used for cultural, educational, and community purposes. As a middle school Social Studies teacher I educate my students on the negative environmental, economic, and social impact the U.S. Army has on our islands.

Virginia Trowbridge

The Army has wrongfully leased the land on Oahu for $1 a year since 1964. This is incredibly disrespectful to the native Hawaiians that it effects and to all American taxpayers as the military gets a majority of said taxes. Not to mention the environmental impact on the land, animals and people that have to listen to gunshots and bombs going off. I strongly oppose the military renewing their lease in 2029 and I am FOR restoring and returning the land!

Grace Tsubaki-Noguchi

I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... Reasons checked below. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good.

These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts.

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environmental impact statement. The EIS should employ this framework in order to address the cumulative effects of all related military activities, not just the proposed project.

US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities. These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai‘anae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities.

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potentially affected." Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku.

Adam TUIFAGU

To whom it may concern:

As a person who loves Hawai‘i and her people, I am firmly opposed to the Army‘s retention of any of the "State" lands at Mākua, Kahuku and Kawailoa-Poamoho. I support the "No Action Alternative" that would allow the three leases to expire and require the Army to comply with all lease terms that include the clean-up of these lands. Alternatives 1-3 all preserve the status quo in which Hawaiian land is bombed, burned, littered and polluted. The status quo is precisely what needs to be upended. As things stand, we are not able to provide for the basic necessities of the people of Hawai‘i. Food, water, shelter, are all in short supply, with the pending climate crisis intensifying the urgent need to re-focus on building resilience locally. Training soldiers for war in distant lands does nothing to address any of these problems nor the harm that training contributes to each.

Scores of concerned citizens have taken time to express to you the impact of the long-term occupation of these lands and US military presence in our islands. Your study should follow the parameters set by these true experts on the impacts of your proposal. Our comments have raised the impacts of the occupation of these parcels, spanning time and space, and your EIS should follow suit. You should evaluate historical harms that would continue should you retain these lands, as well as the growing cumulative impact that would compound should you continue misusing these lands. Alternative futures that your retention of these lands would foreclose should also be considered.

Please add to the "Alternatives" section, alternatives that include:
1) Diplomacy with those the military perceives as potentially requiring a combat response and disclosing disputes for civil remediation. This would eliminate the need for combat mission training exercises.

2) Reprioritize food security and resilient communities as a counterattack strategy. Rather than meet an attack in the theater of U.S. Pacific operations through armed forces, a counter-measure would focus on rebuilding the capacity of communities to rebuild and sustain themselves. This alternative would meet the purpose and need through the long term goal of securing Hawai`i against the depredations of state enemies.

3) Retention of lands to ensure appropriate stewardship and ecological preservation, including wildlife fighting capacity, for the duration of a planning period for transition to a public land trust and/or organizations or associations of communities that will properly steward the land. This would augment your "No Action" alternative and allow for immediate questions of landowner liability to be addressed to the U.S. military.

Instead of insisting on the current path of retaining these lands, switch gears and genuinely engage the community on a clean-up plan that sets us on a path to return these lands to those who love them. This return of ‘āina is long overdue. The time is now to give the #landback.

Aloha ‘Āina,

Adam Nākoa Tuifagu

Adrienne Turner

"Oh, my name is Adrian and I'm a resident of Tennessee, and I'm very strongly opposed to the extension of the military leases on the island of Oahu. The extension of these leases will allow the military to further damage the natural resources of these areas, including the natural habitats and the Native Hawaiian plants and animals and this will just continuously disrupt the lives of the local community in general, and I'm sure all of us to be able to visit the land of but of course they can't right now because it's occupied by the army. And then the army has wrongfully leased the land from the state for $1 since 1964. When these leases expire in 2029 this land should be immediately restored to the public for the reasons I previously stated, thank you. "

Traci Turner

The military installations on Oahu should be returned to the control of the state of Hawaii. Using this land as a staging area for military buildup in the Pacific is a waste of tax payer dollars and does not deter foreign military actions.

Tessa Turpin

The army should not expand its base in Hawaii. Doing so will disrupt native ecosystems. They've done enough harm to the land already.

Kaitlin Tweedie

Where do I even begin? This land that is being taken from us is more sacred than you can imagine and it's being destroyed for mere military practice. What good is the land if it's destroyed? All this destruction will only result in more chaos. And who will be happy then? It's the the same thing that's happening with the rest of the world. And it's sad to see that money is more important than the livelihood of the people. How can we even call ourselves human? What more do you need? Why not take our salvation as well?

Frederick Tyres

"Aloha. My name is said Frederick Tyres and I'm a resident of Oahu and I am strongly opposed to the extension of military leases on the land of Makua, Kahuku, and Wahiawa. An extension of these leases will allow the military to further damage the natural resources of these areas. Destroy the natural habitats of Native Hawaiian plants and animals and continually disrupt the lives of the local community. The army is wrongfully leased these lands from the state for $1 since 1964. When the lease is expiring 2029 this land should be immediately restored to the public and the Native Hawaiian people. Mahalo "

Kamalani Uehara

Makua used to be a beautiful place. Please do not allow continued military training on our 'aina. The local community does not benefit one bit from military presence. Continued training on this 'aina promotes desecration of land, ecosystem, native species, and creates hewa with kanaka today and of the past. Since military has arrived to these islands, there has been such a tight grasp on anything they can claim. To my knowledge, only Kaho'olawe was "returned," after YEARS of BOMBS being dropped shaking neighboring islands and pummeling the land into the dirtless, windy rock it is today. And still, us kanaka are in the process of making efforts to restore it. It is 2021, start making things right, US Military! The federal apology in 1993 is for nothing without action. Get out of our home.

Tavia Ukauka

Please no more military army trading on Oahu or any Hawaiian islands! Give Hawaiians their land back!

Sunny Unga

To whom it may concern:

I am firmly opposed to the Army‘s retention of any of the "State" lands at Mākua, Kahuku and Kawailoa-Poamoho. I support the "No Action Alternative" that would allow the three leases to expire and require the Army to comply with all lease terms that include the clean-up of these lands. Alternatives 1-3 all preserve the status quo in which Hawaiian land is bombed, burned, littered and polluted. The status quo is precisely what needs to be upended. As things stand, we are not able to provide for the basic necessities of the people of Hawai‘i. Food, water, shelter, are all in short supply, with the pending climate crisis intensifying the urgent need to re-focus on building resilience locally. Training soldiers for war in distant lands does nothing to address any of these problems nor the harm that training contributes to each.

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Instead of insisting on the current path of retaining these lands, switch gears and genuinely engage the community on a clean-up plan that sets us on a path to return these lands to those who love them. This return of ‘āina is long overdue. The time is now to give the #landback.

Annette Mehana Unten

I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... It's time. The U.S. government took this land for the protection of outside forces. The threat is no longer there. Give the property back. Train on the mainland where there is more land. Our land is sacred. I have been in the Kahuku mountains after a testing. The mountains are trashed and totally disrespected. Enough already. Stop now! Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state's constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts.

The EIS process currently considers a "no action alternative" as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored.

Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the "fair treatment of all people". Fair treatment means "no group of people should bear a disproportionate share of the negative environmental consequences". The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world.

US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many

Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities.
These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai‘anae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities.
Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Wai‘anae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands.
In the Ching vs. Case ruling, the court found the state to have a trust duty to “mālama ‘āina” and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using.
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Andrea Valencia

The retention of these lands for any type of military use is neither necessary nor preferable and as a local resident and native Hawaiian I ask that you do not seek to renew the leases on these locations.

Ashlee Valeros

I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... too much of Hawai'i land is already occupied by the U.S. military. The land belongs to the Kanaka Maoli people. We need less military occupation and more land for our native Hawaiians.
Environmental justice (EJ) as defined by the EPA requires "meaningful involvement" of impacted communities such that "decision makers will seek out and facilitate the involvement of those potentially affected." Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku.
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cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities.

US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities.

These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. In 1997, the CEQ produced a guide titled “Considering Cumulative Effects Under the National Environmental Policy Act” which provides a framework for advancing environmental impact analysis by addressing cumulative effects in either an environmental assessment (EA) or an environmental impact statement. The EIS should employ this framework in order to address the cumulative effects of all related military activities, not just the proposed project.

Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the “fair treatment of all people”. Fair treatment means “no group of people should bear a disproportionate share of the negative environmental consequences”. The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world.

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of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good.

Brandon Valeros

I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... It's just plain wrong and destructive to my home! Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good.
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Your illegal occupation of my home is ridiculous you treaty breaking shit sticks

Anna van Dorsten

"I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... Hawaiian people deserve to have their land to be able to use for cultural, educational, or other purposes besides military use by their colonizers. I would like to submit the follow comments regarding the Army's upcoming Environmental Impact Statement, which proposes to retain up to 6,300 acres of land on Oʻahu for military training purposes. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawaiʻi, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawaiʻi has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawaiʻi courts have also acknowledged the state's constitutional duty to mālama ʻāina. The leasing of ʻāina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ʻāina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on Oʻahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a "no action alternative" as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Waiʻanae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ʻāina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the "fair treatment of all people". Fair treatment means "no group of people should bear a disproportionate share of the negative environmental consequences". The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ʻāina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawaiʻi: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawaiʻi residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military

training. The EIS should address the disparate impacts that these leases will have on these communities. Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Waiʻanae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands. These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Waiʻanae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities. In the Ching vs. Case ruling, the court found the state to have a trust duty to "mālama ʻāina" and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using. These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through moʻolelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access. Environmental justice (EJ) as defined by the EPA requires "meaningful involvement" of impacted communities such that "decision makers will seek out and facilitate the involvement of those potentially affected." Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meeting s and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku.

Julian Vandeventer

Article 28 of the UNDRIP states "Military activities shall not take place in the lands and territories of indigenous people, unless otherwise freely agreed upon by the peoples concerned". Said peoples, the Hawaiian community, have NOT agreed upon such activity, thus the protests. Article VI of the US Constitution is also broke (treaties) in the "lease" of concerned land.

Suzanne Vares-Lum

It would be wonderful if one day we could realize world peace, and the U.S. would have no adversaries to deter, but the reality remains that we have significant threats to the U.S. and that includes Hawaii. The Indo-Asia-Pacific Region is witnessing a rising PRC that is hedging its way across Oceania, an increasingly assertive Russia, and an unstable and unpredictable leader in North Korea, Violent Extremism in South and South East Asia, and more natural disasters than any other region on the planet. The United States and its allies and partners need a trained and ready force to deter our adversaries and to be postured in the region -- if our forces are not ready and trained and are not present in the region, the U.S. deterrence will fail.

For these reasons, I wholeheartedly support the ability of the Army and other services including the Hawaii National Guard and the Marines to train both on Oahu as well as Pohakuloa Training Area. In recognizing how critical the U.S. military presence is to Hawaii's economy, I Suzanne Vares-Lum, underscore that the preceding EIS and community engagement are vital to support military readiness as it supports all Hawaii-based military actions and across the Indo-Asia-Pacific region.

Renewal of lands for military use does not alter the responsibility of the environmental stewardship that the Army and the military has been working hard to invest and improve over time. This EIS process I believe is genuine, and I believe the Army desires to take a hard look at balancing security and readiness with environmental stewardship and access. There are creative solutions for coexistence.

Shika Veera

This is unbelievable. For the environment and the people of the region. Appropriate compensation should be provided if anything, but there is no need for so many military bases.

Mia Vergari

The military should not renew their lease in Hawaii land. This land was taken from indigenous peoples and belongs to them. The military weapons testing is destroying the land.

Christina Vien

I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... Military occupation is harmful to the fragile ecosystem. Hawaii has many endemic plants that are in danger of be coming extinct. Military actions, such as testing, must stop in Hawaii. Hawaii's land should be used for public goods such a as conservation, housing for permanent residents, open space, agriculture and farming. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state's constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good.

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The EIS process currently considers a "no action alternative" as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored.

Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the "fair treatment of all people". Fair treatment means "no group of people should bear a disproportionate share of the negative environmental consequences". The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world.

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over time. In 1997, the CEQ produced a guide titled "Considering Cumulative Effects Under the National Environmental Policy Act" which provides a framework for advancing environmental impact analysis by addressing cumulative effects in either an environmental assessment (EA) or an environmental impact statement. The EIS should employ this framework in order to address the cumulative effects of all related military activities, not just the proposed project.

US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai'i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai'i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities.

These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai'anae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities.

Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Wai'anae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands.

In the Ching vs. Case ruling, the court found the state to have a trust duty to "mālama 'āina" and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using.

These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through mo'olelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural

access.
Environmental justice (EJ) as defined by the EPA requires “meaningful involvement” of impacted communities such that “decision makers will seek out and facilitate the involvement of those potentially affected.” Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku.

Elizabeth Villasana

I strongly oppose the extension of military leases on the lands of Mākua, Kahuku, and Wahiawā. An extension of these leases will allow the US military to further damage the natural resources of this area, destroy the natural habitats of native Hawaiian plants and animals, and continually disrupt the lives of the local communities. The army has wrongfully leased this land for $1 since 1964. When the leases expire in 2029 this land should be released back to native indigenous Hawaiians.

Elizabeth Villasana

Hello,
My name is Elizabeth Villasana and I'm a resident of Chattanooga, Tennessee. I'm emailing today in regards to the Army Training Land Retention Oahu EIS- Scoping.
I strongly oppose the extension of military leases on the Mākua, Kahuku, and Wahiawā. An extension of these leases will allow the US military to further damage the natural resources of this area, destroy the natural habitats of native Hawaiian plants and animals, and continually disrupt the lives of the local communities. The army has wrongfully leased this land for $1 since 1964. When the leases expire in 2029 this land should be released back to native indigenous Hawaiians.
Thank you for your time,Elizabeth

Viana Villasenor

I would like to submit the follow comments regarding the Army's upcoming Environmental Impact Statement, which proposes to retain up to 6,300 acres of land on Oʻahu for military training purposes. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawaiʻi, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawaiʻi has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawaiʻi courts have also acknowledged the state's constitutional duty to mālama ʻāina. The leasing of ʻāina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ʻāina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on Oʻahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a "no action alternative" as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Waiʻanae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ʻāina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the "fair treatment of all people". Fair treatment means "no group of people should bear a disproportionate share of the negative environmental consequences". The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ʻāina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawaiʻi: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawaiʻi residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities. These military training lands are situated in communities that are majority

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Emma Villemarette

Good morning,
I recently became aware that the US military is up to renew its lease on the island of O'ahu. After the tragedies and disenfranchisement of native people nationally and globally, historically and presently, I would like to see more of this land go back to them. The percentage or military land to native land is appalling when compared on a map. I urge you to take a step back and analyze this situation from an objective standpoint.
All the best,Emma Villemarette

Nicole Vise

Aloha kakou,

My name is Nicole Vise and I am writing in regard to the Army Training Land Retention EIS. I am a Cultural Researcher who has worked in the cultural resource management field for over 12 years and has interviewed more than 75 people throughout the Hawaiian Islands for various State, County, Federal, and private projects. A contentious topic for many Native Hawaiians and long-time residents is the presence of the military impeding on Hawaiian lands. These places where military training occurs, pollute the ground which eventually seeps into our aquifers and drains into our ocean thus affecting our water supply and aquaculture that we gather for personal consumption. Some of the contracts that I have worked on professionally include the subject areas, where I do recall there being cultural sites present and where cultural groups continue to hold ceremonies on site. I encourage you to conduct a thorough EIS that at least includes an archaeological inspection of the properties with a historic property condition report; a cultural impact assessment; a traffic management study; a socio-economic study; a noise-pollution study; and a hydrology study.

Kalyn Wadsworth

Hello, I am a resident of Waialua and work on a farm in Hale'iwa.

I'm gonna start by addressing the types of concerns you'd like to hear. Then I will get to a larger, more important point that you probably don't want to keep hearing but really should listen to.

First, there are military aircrafts that fly above where I work multiple times every week which create loud, disturbing noises that make it harder to work. There are also many other animals and organisms-that contribute to the health and success of the farm-who may be harmed by the noises and vibrations of the aircrafts. Along with the physical noise disturbance, the use of this land for military training will lead to continued depletion of the ecosystem health and quality. The human boundaries created to separate training area from the rest is followed by humans alone—so damage done to the ecological systems and organisms within the training area affects entire ecological communities beyond the military's boundaries as well. Ecological communities like the farm land I work with and where many people live and work here on north shore.

Now, to reiterate the type of message I know you've already heard many times but I really wish you would actually listen to and act on:

No matter how hard the U.S. military works to create and uphold the false narrative that they bring protection and freedom to people-the reality is that it's presence here is a violent stance against the freedom of Native Hawaiian people. The military is occupying stolen land and they should be working seriously to implement the best processes of restoring and returning land to Kānaka Maoli.

Kaukaohu Wahilani

Hi. Aloha, Kehau....A little mele. (Chanting in Hawaiian). Aloha mai kakou. Kaukaohu Wahilani ma puhea mai au, this Waianae Valley. Born and raised in Waianae Makua, and I totally oppose with the extension of the lease in our beloved Makua Valley. I'm here to stand up for those, our kupuna that got displaced from Makua, and our kupuna that are still in Makua. As a member of Na Kane Koa Makua, we go out every night to Makua, to Ka'ena State Park, to protect it from people from all over the world, including military that come over there every night to camp when they can camp. But I'm just in opposition. And I want to state to all my people that -- all are kanaka that testified and non-kanaka in opposition, mahalo nui. Respect our existence or expect our resistance. A hui hou. Mahalo, Kehau.

Purdyka Wahilani

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Arthur Wall

Renewal of the Pohakuloa lease to the US Army must be made with a tangible commitment to repair environmental damages to that area by the U.S. Army, to develop zero-impact programs for future use, and pay a current market leasing rate according to market rates for range land rental on the Big Island of Hawai'i.

Environmental and cultural stewardship by the U.S. Army must be intrinsic in any future leases.

Lexis Wallace

There is no reason for the army to continue to occupy this land. Train the army elsewhere. Hawaii is incredibly limited in the amount of land it has. Not to mention this occupation is incredibly detrimental to native Hawaiians and Hawaii's economy. Give up the land and give it back to its rightful owners, Hawaiian natives.

Amy Wasielewski

To whom it may concern:
As a person who supports Hawai‘i and the people who are calling for it to be returned to its people, I am firmly opposed to the Army‘s retention of any of the “State” lands at Mākua, Kahuku and Kawailoa-Poamoho. I support the “No Action Alternative” that would allow the three leases to expire and require the Army to comply with all lease terms that include the clean-up of these lands. Alternatives 1-3 all preserve the status quo in which Hawaiian land is bombed, burned, littered and polluted. The status quo is precisely what needs to be upended. As things stand, we are not able to provide for the basic necessities of the people of Hawai‘i. Food, water, shelter, are all in short supply, with the pending climate crisis intensifying the urgent need to re-focus on building resilience locally. Training soldiers for war in distant lands does nothing to address any of these problems nor the harm that training contributes to each.
The military controls 22.4% of O'ahu while the islands were never ceded to the United States. It is time to listen to people of Hawai'i that are speaking directly to you now. Your EIS should take into account the historical harm caused by the occupation of O'ahu as well as the ongoing impact on the land and resources of the island caused by military misuse.
Alternative futures that your retention of these lands would foreclose should also be considered. Please add to the "Alternatives" section, alternatives that include: 1) Diplomacy with those the military perceives as potentially requiring a combat response and disclosing disputes for civil remediation. This would eliminate the need for combat mission training exercises. 2) Reprioritize food security and resilient communities as a counterattack strategy. Rather than meet an attack in the theater of U.S. Pacific operations through armed forces, a counter-measure would focus on rebuilding the capacity of communities to rebuild and sustain themselves. This alternative would meet the purpose and need through the long term goal of securing Hawai`i against the depredations of state enemies. 3) Retention of lands to ensure appropriate stewardship and ecological preservation, including wildlife fighting capacity, for the duration of a planning period for transition to a public land trust and/or organizations or associations of communities that will properly steward the land. This would augment your "No Action" alternative and allow for immediate questions of landowner liability to be addressed to the U.S. military. Instead of insisting on the current path of retaining these lands, switch gears and genuinely engage the community on a clean-up plan that sets us on a path to return these lands to those who love them. This return of ‘āina is long overdue. The time is now to give the #landback.

Danny Wassman

With more and more of the Native Hawaiian population being pushed out of Hawaii due to over priced housing by foreign developers / investors the military leased land should be returned to the Hawaii Nation. We need to house our native population and get them off of the streets and beaches . They deserve to have the best of what this Aina has to offer and nothing less than that. These are people born and raised in Hawaii, local people who know and love this Aina.
It is time to return what you have leased for the past century. We have all stood by and continue to watch the never ending abuse of Hawaiian Lands being illegally misused by government and military for personal profit.
We need to stop and reset our goals for our Homeland and our People before moving into any further unknown foreign investment. People before Profiti is the only way,

Mahalo Dw

Joseph Wat

Aloha kākou,

The United States Military has wide sweeping impacts across the islands and the world. In this time of underfunded public institutions, immense wealth inequality, lack of affordable housing, and disappearing open space, the continued extremely cheap leasing of these vast public lands to the United States Military is unacceptable.

Please return these lands to the people of Hawai‘i.

At the very least... significantly increase the price to the military for the uses of these spaces. While it is impossible to put a price tag on the sounds of explosions and gunfire heard from Wahiawa in Waianae classrooms and loss of and exclusion from ancestral lands... if military use of these lands continues no school, hospital, or other public serving institution in Hawai‘i should be lacking knowing the unknowably deep pockets and unaudited budget of the US Military.

Why should the public trust that the military will use these lands appropriately after the damages done in Mākua Valley? How much closer to growing our own food would be if access were granted to Poamoho? How much cheaper would rent be if the rental budget allotment for military families was not in the picture? How much housing would be opened?

Please consider the longstanding detrimental impact of military use of these lands. If caring for the land that we stand on is not enough of a plea, demand enough compensation that the people of Hawai‘i living off out of these areas can thrive! Please make the military tend to Mākua to the point where the public can safely access it before giving the military continued access to the rest of our spaces!

Thank you,
- Joe

Lauren Watanabe

"Aloha. My name is Lauren Watanabe I am a resident of Honolulu Oahu and I strongly oppose the extension of the military leases on the lands of Makua, Kahuku, and Wahiawa. I'm also a member of the Sierra Club equality and organize your with the with the club and with our extensive look at the leases, which have been going on for decades it has created almost irreversible damage to our native natural habitat. Native Hawaiian and plants and animals and we are interdependent with their ecosystems. And so this continual disruption by military presence and testing is really impacting Again, these ecosystems and the lives of the local community at the same time, the army has wrongfully least these blends from the state for only $1 Since the 1960s. When it expires, this land should be immediately restored to the public. It should be restored to Hawaiians were in desperate need of land, especially on Oahu. And it is incredibly important that it is us and steward in a way that benefits the people of Hawaii and does not again continually to disrupt and do harm to our natural environment and natural resources that we desperately need to protect. So I hope you continue to look into this impact and do the right thing and deny this lease. Thank you. "

Patrick Watson

Aloha,

As a native Hawaiian and part of a large family on Oahu, with documented lineage tracing back 36 generations, I would like to see a large reduction in the military control of lands on Oahu. Kaho'olawe, Pōhakuloa, and Makua Valley are prime examples of what a military lease represents.

Prime areas on Oahu like parts of Pearl Harbor, Kaneohe Bay/North Beach, Makua Valley, Wahiawa, Waimanalo, Lualualei, Pokai Bay, Ewa Beach, Red Hill, Waikiki, Diamond Head, Kahuku, and Dillingham/Mokuleia have been under military control for as long as I have been alive, and consequently some of these areas made inaccesible to locals like me have been environmentally damaged. My mother told me when she was little, her mother (my grama) was a singer/hula dancer on the beaches of Waikiki and grama would scold my mom for being there because that beach was "for military and haoles" only.

Historically the perception is that the land was taken from Hawaiians illegally by the U.S. government. Then during the war more land was seized and locals were again displaced and demeaned by being told they did not have access to areas they once enjoyed and relied on for subsistence. Pearl Harbor was named due to the prolific oyster population it once contained in it's pristine bays. Now West Loch is a nasty stagnant smelly mess with signs everywhere warning against eating any fish from that area. Poka'i Bay in Wai'anae was once the gathering place and central hub for the Wai'anae coast with endless fishing resources, limu, recreation, and a critical location historically for our Hawaiian culture. Now it has become a recreational spot catering favorably to military families, and forcing local families to park off site to walk long distances around restricted access areas, and the local end of the beach has become a notorious gathering place for homeless and drug users. Perhaps the military can take some initiative and besides protecting their "own" they could protect the citizens of our communities and regularly enforce order in trouble spots like Poka'i, insead of allowing resident watch groups made up of women and the vulnerable to try to police the areas in question.

From a practical standpoint, I do support our U.S. military and understand they need to retain certain areas and bases for our country's security, and to maintain training areas for readiness in the event of war. And I am not a big fan of what today's society has championed as "reparations"; i.e. A two year old Japanese child does not owe me for what happened at Pearl Harbor 80 years ago. She wasn't there and neither was I. But there is some credibility to the idea that Hawaiians have had much taken from them unfairly, and that the military/U.S. government should make every effort to be sympathetic to ideas of restitution and good will by returning as much of our land back to its originally intended uses and condition as possible.

I would be open to retention of some of the land for military purpose if there were concessions towards releasing more areas to public access, and if the military was immediately being responsible and proactive towards cleaning up and restoring the areas that have been used for the last 65 years as if these lands will not be renewed for military use, needing to be returned in as good or better condition from when they first took occupancy.

The lack of responsibility demonstrated at Makua Valley for detrimental environmental impacts such as the threat caused by unexploded ordinances, hazardous material runoff, desecration of sacred Hawaiian sites, and irreparable damage to the rare plants and wildlife in that ecosystem, coupled with an inability from the military to provide an EIS in 2001-2004 to support the continued use of live fire in Makua, does not speak highly for supporting these types of military operations in those areas.

Discussions for opening access to non-project related military areas which would greatly benefit the public, such as agricultural development in Lualualei Valley which has suffered less adverse effects from unexploded ordinances than Makua Valley, and travel access and development of a public thouroughfare/highway through the adjacent Kolekole Pass should be considered.

This would offset the current food needs and traffic burdens on the Wai'anae coast and greatly facilitate alternate travel routes as well. The community benefit would be prolific and welcomed. In exchange, some of the properties like Makua Valley could be bargained for as long as the protocols change and include environmental clean up and monitoring, and reduced military footprint to allow for more public access and cultural practitioner events.

I also want to see a fair monetary value applied to the properties they are requesting retention of, adjusted annually, with those monies collected being made available to community benefits in the affected areas. This could address homelessness, hunger, housing, job development, and community building.

I would also request that the terms of these "leases" not be 65 years. They should be reduced to 25-30 year periods, and clauses in the contractual language requiring that the military meets with the local government to revisit the lease conditions every 10 years, to evaluate environmental impact performance, opportunity for ammendments as technology and military requirements change, and allow for community input on how the lease holders have performed.

Mahalo,

Patrick Watson

Adam Wayson

Currently Makua is littered with old ammunition and is a serious liability to anyone visiting the state park... I am a volunteer with Hawaii state parks and I am currently working on restoration efforts in the Makua area including Kaneana Cave and The dunes between Makua beach in the cave, regularly I come across ammunition sitting on the surface many people are attempting to dig into the ground to plant native species in an attempt to restore the natural ecosystem, unfortunately due to the militaries influence in the area it is quite dangerous to explore. Please clean up your mess as you have destroyed a sacred space and it deserves to be treated as such.

Brittany Weaver

Kānaka maioli deserve their lands back.

Mickey Weems

Okay. Aloha. My name is MickeyWeems. I'm a proud Marine from a military familythat goes back to the Civil War. We fought for theUnion. I want to talk to you about honor. I wentto visit the ROTC center over on the U.H. Manoacampus, and looking about, I was talking with thecommandant there, the commander. There were all these mea kaua, weapons ofwar, there. There were all these ihe, spears. Therewere leiomano there. There were, like, thesehandcrafted Hawaiian weapons that were given inhonor to people for various services. And thatapparently is a military thing. I mean, even some of the mottos over atthe ROTC center are in Hawaiian. So there's thishonor superficially given to the kanaka maoli, and Iwould -- I would remind that that honor iscontingent upon a kuleana, responsibility, torespect the people from which you are deriving thismana. Okay? I see no problem with it, because one ofmy friends is Umi Kai. He's a weapons master, and heprobably made a lot of the weapons that you all use,or given. And he has this to say, and I'm going toend my -- my thing, just reminding you about honor.The honor is respect the wishes of the kanaka maolion this, and that is to give the land back; okay? He says this. He says the U.S. governmentneeds to control the military's use of land andrespect what it means to the natives that have caredfor it for generations. So thank you very much.

Rebekah Wegesend

This is a terrible idea. Give Hawaiians back their land. It's not a training center for the United States. It's scared and needs to be cared for by those who know the land better.

Gail Weininger

Please do what you can to find other non-military uses for the land that has been leased to the US government as a military base. It's time that we develop non-combative approaches to regional and world problems, and better uses for the money that is involved in maintaining such sites and equipment.Thank you for considering ways in which that land can be used to benefit the civilian population!Gail Weininger

Jaclyn Weiss

I believe the military should not occupy so much land in Hawaii and should give it back to the natives. Military testing can be done somewhere else, these natives deserve their sacred land back.

Danielle West

"Hi, my name is Danielle West on the resident in Oahu and a guest here on the aina and I'm calling to Encourage a very rigorous EIS, the only possible conclusion I would see from an environmental impact statement of continued to occupation continued leasing is the destruction, detoxification, the desecration of the sacred land, and and the people who have lived on in Memorial before before this military occupation. I calling because I oppose, I firmly oppose or in preparation for war at the expense of the aina and the people of the at this time in history, especially with global warming. The bombs. The live fire practice any of that is It's offensive. It shouldn't be happening. And I encourage you to to partake in a rigorous study that that those impacts are non reversible and unacceptable and Yeah. Encourage y'all not to. I encourage you to stop pursuing renewing the leases. Thank you. "

Kenneth Wethington

Do not re-lease Kahuku Training Area (KTA), Kawailoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR) on the island of O‘ahu, called "O‘ahu ATLR EIS." The United States invaded the Hawaiian Kingdom on January 16, 1893 and has illegally occupied Hawaii ever since. The US government destroys the land that it occupies with development, unexploded ordinance (UXO) clean up, Depleted Uranium and other toxic contamination of air, land and ground water, and invasive species. The Hawaiian landscape is forever marred by by the occupation. The only way for Hawaiian land to be restored to end the lease! 23,000 acres of land near Waiki'i Ranch was purchased by the military from Parker Ranch for the Stryker Maneuver area. But the Strykers are no longer in Hawaii. They are in Washington state. But guess what the Military is keeping the 23,000-acres Stryker area with no Strykers. Why? There is no need. Clean up the mess and return all Hawaiian lands to Hawaiian hands. Like it was long overdue for the US to leave Afghanistan after 20 years of occupation, it is long past time for the US to leave Hawaii after 128 years of illegal military occupation.

Ashleigh Whitman

Hello people,
I oppose the military getting the land back and having all of the desecration be renewed for another century.

Sincerely,
Ashleigh Whitman.

Richard Whyte

The Osprey and CH53 from KMCAS and Apache and Chinooks from Wheeler fly over homes and along beaches day evening and night. The more we call the empty complaint phone lines the lower they seem to fly. They ask for time, place and type of aircraft like the US military does not know where its aircraft are at all times in 2021. They know they are buzzing the beaches at 100ft. on an excellent tour of duty. Training rollercoasters and circles over the shoreline is four pilots destroying the lives of thousands of their own citizens. The military responded to complaints in the 80s and 90s; they don't anymore. It is a constant drone of noise and they don't care.
Your EIS is in-house but still please know the community can not take the helicopters flying over our homes, beaches, valleys and lives enroute to training areas.

Richard Whyte

Aloha,
We would like to support the troops but speaking for many folks in our community the military activity on the North Shore has become intolerable. Noise complaint lines are unmanned. A blockade of community input from Public Affairs representatives by Kala, Amy, Stephany, Danny, etc, may not be allowing this problem to get through to the Colonel.
The noise gets worse. training is unannounced to neighborhood boards anymore because it continues in perpetuity. Shoved upon us lately without regard. In years past when the community complained the noise stopped for a while. Now it is in the afternoons to late at night 7 days a week. I am sorry, too, our home and living now happens to be in the flightpath between bases and training areas. And it is nice for the trainers to be in such a beautiful place for maneuvers and sorties off of the beaches. However, this is psychoacoustic warfare waged on your own community and the mission needs imaginative innovative thinking to solve. We need a break.
A day at our house: Caution-https://www.youtube.com/watch?v=DT5XuN2JzdE
Mahalo,Richard WhyteKawailoa District

Jade Wilber

I oppose the military getting the land on Oahu back.

Beverly Wilkinson

Aloha, my name is Beverly Wilkinson and I am a resident of Augusta, Georgia. I am strongly opposed to the extension of military leases on the lands of Mākua, Kahuku, and Wahiawā. An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of native Hawaiian plants and animals, and continually disrupt the lives of the local community. The Army has wrongfully leased these lands from the state for $1 since 1964. When the leases expire in 2029, I believe that this land should be restored and returned to the public and native groups of Hawaii.

Sara Williams

Hello,
As a U.S. citizen and a veteran, I oppose the Army continuing to lease these lands on O'ahu. This land should be returned to the native Hawaiians, as I'm sure any training happening there could easily be done elsewhere.
Thank you,Sara WilliamsRochester, NH

Amanda Wilmsen

As the median price for homes on O‘ahu approaches $1 million, it is wrong for the US Army to continue to exploit thousands of acres for just $1. This land should be used to support the people of O'ahu, not the US military. The native people of O'ahu should have access to their sacred sites and the resources of the island.

Annie Wilson

The military occupation of this land is unjust and un-American to the highest degree. This land holds very high value that isn't being addressed, and also does not address the lack of sovereignty of the Hawaiian people in this choice.

Joe Wilson

As a resident of north shore Oahu, in a neighborhood on the perimeter of the Kahuku Training Area, I and my community observe and are constantly disrupted by the presence of the U.S. Military.

And while I share the larger concerns many, Native Hawaiians in particular, raise about the military's taking of and desecration of these lands, I have more specific questions about the effects of military activities that are not so visible to the civilian eye.

What is the scope of training and other activities that take place on the Kahuku Training Area (KTA)?

How many flights per day?
What types of aircraft?
What flight paths are they permitted to use?
How often do they deviate from these paths?
What are the consequences of such deviation?
What are the effects of the emissions (noise, fuel, other) on people, flora, fauna, marine life, in the paths of these aircraft?
How do the noise levels and other emissions of these aircraft affect and/or exacerbate cognitive function, sleep disturbance, and overall physical and mental health of residents ?
What are the decibel levels at different times throughout the day and night?
Do they adhere to or exceed legal limits?
What studies are these data based on or what studies will be conducted to make these determinations?

Are the aircraft flying into and out of KTA landing on KTA grounds?
How many people are on these aircraft?
What are the range of activities in which they engage within the KTA?
What effects are the aircraft, personnel, and their movements having on the flora and fauna of the KTA, either while in air or on the ground?
What are their effects on streams, other water ways, and on the water table and the quality and safety of the drinking water for residents?
What studies are these data based on or what studies will be conducted to make these determinations?

How many land-based vehicles travel to and from the KTA daily on average?
Which roadways are they using?
What are the effects of vehicle emissions on residents, flora, fauna and marine life within the KTA and along their routes between military installations?
What are the effects of these vehicles on public infrastructure (roads, bridges, neighborhood streets)? What studies are these data based on or what studies will be conducted to make these determinations?

How many personnel are in the vehicles that travel to, from and enter KTA?
In what activities do they engage within the KTA?

What are the effects of their movements within the KTA on flora, fauna, waterways, the water table, and other environmental features?
Of all activities that take place within the KTA, what are their effects on nearby communities, agricultural lands, wetlands, the water table, coastal zones, marine life?
What studies are these data based on or what studies will be conducted to make these determinations?

What are the native and endangered species known to inhabit or frequent the environment within what the KTA?
Of all activities that take place within the KTA, what are their effects on these endemic and endangered species?
What studies are these data based on or what studies will be conducted to make these determinations?

What Native Hawaiian cultural sites are encompassed within or have been overtaken by the KTA?
Of all activities that take place within the KTA, what are their effects on these cultural sites?
What have been, are, or will be the effects of these activities on cultural practitioners, particularly those practitioners who have been denied access to these sites?
What studies are these data based on or what studies will be conducted to make these determinations?

When, how, and why did the U.S. Military introduce Chromolaena odorata, commonly known as Devil Weed – one of the world's worst invasive species - to Hawaii, Oahu, and specifically, to the Kahuku Training Area?
What have been, are, and will be its effects on the flora and fauna within the KTA and on nearby agricultural areas, residential communities, wetlands, coastal zones, and marine life?
What eradication efforts have been attempted or are being conducted against Devil Weed?
What have been / are the consequences of these eradication Devil Weed efforts?
How would lease renewal affect, potentially worsen, the impacts of the Devil Weed within the KTA and in the surrounding region?
What studies are these data based on or what studies will be conducted to make these determinations?

What is the accounting of all U.S. Military activities that have taken place within the KTA since the signing of the original lease in 1964?
What have been the effects of these activities on the environment, flora, fauna, endangered species, and human health of those within the KTA and nearby regions?
What studies are these data based on or what studies will be conducted to make these determinations?

Throughout the lifetime of the U.S. Military leases of lands known as the KTA, what is the accounting of mitigation or clean-up activities that have taken place?
When and where have these activities been made available to the public?

For what specific uses does the U.S. Military need to renew the leases of lands now known as the Kahuku Training Area?
What are the known or potential impacts of these activities on the environment, flora, fauna, endangered species, and human health of those within the KTA and nearby communities and

regions?
What studies will be conducted to make these determinations?
How and when will these studies or other reports be made available to the public?

What have been the line item financial costs to taxpayers - at the federal, state, and county level - of all activities that have taken place at the KTA since the signing of the original lease in 1964?
What are the projected line item financial costs to taxpayers - at the federal, state, and county level - of all activities that would take place at the KTA if the lease is renewed or extended in some form?
How will these studies or other reports be conducted and how and when will they be made available to the public?

Joe Wilson
Ko'olau Waialua Alliance

Vernon Wilson

My name is Vernon Wilson,born and raised in Wahiawa, and I oppose anyextension of your lease. Thank you.

Austin Windau

The U.S. military must withdraw their lease over these thousands of acres of Hawaiian land, as it has been a detriment to the environment of natives of Hawaii. The U.S. military is a large factor in the rising rate of climate change, as well as local fauna and flora. Continuing training on this land will further disrupt ecosystems and wildlife, as well as continue the grasp the country has had over the island society for decades. The natives coexisted with the land and had their own separate culture before the U.S. invaded and dethroned their queen to claim the land for ourselves. This is a chance to help give back part of what we stole and ease the grip colonialism has over the island. The native peoples have had their land stolen and their culture trampled, and all that remains is a careless tourism industry and a massive military presence on their doorstep. If the U.S. truly wants to view itself as some "beacon of freedom", then holding an entire island hostage under military presence is not the way it should be done. Please reconsider the lease and actually work to protect our communities by listening to them and helping them with empathy, not overwhelming force.

John Witeck

"Aloha. I‘m John Witeck a resident of Honolulu, HI. I want the EIS to deal with the pollution and the other issues of contamination of the environment that has gone on at Kahuku, Pohakuloa, and other places. I think the issue of justice for the kanaka maoli, the Native Hawaiian people also needs to be considered because it's their environment and these are their lands. And I think they should be restored to the to the original occupants of the islands, who lost so much and had their lands illegally seized and their government overthrown. The military does not need all these training areas. They‘re extensive, they can be used for more productive and positive purposes than warfare training. Aloha. Thank you for considering my comments again I‘m John Witeck W-I-T-E-C-K, longtime resident and a hope this process is a fair one and the lands are restored to the people of Hawaii. Aloha. "

John Witeck

"I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... these lands should be returned to the Kanaka Maoli and the people of Hawai'i for constructive, non-military uses. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state's constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the "fair treatment of all people". Fair treatment means "no group of people should bear a disproportionate share of the negative environmental consequences". The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities. Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Wai‘anae Coast to evaluate whether they posed a human health risk due to

contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands. The U.S. Army has held these leases for generations. It is time to restore the lands to positive uses that benefit the people of Hawai'i. Military use if our lands make Hawai'i a target rather than a place of peace and aloha! The US military must end its occupation of Hawai'i!

John & Lucy Witeck

TESTIMONY OPPOSING THE RENEWAL OF LEASES TO THE U.S. ARMY FOR LARGE TRACTS OF LAND ON OAHU

The U.S. Army's past record on environmental conservation of these thousands of acres at Makua, Poamoho and Kahuku speaks strongly against granting the Army the renewal of their leases for those tracts. There has been considerable devastation of those lands and, in the opinions and culture of Hawai'i's indigenous people, a desecration of sacred sites.

The land -- the aina -- is itself a gift that is to be used to sustain life, not to be a staging area for global war-making operations. The more Hawai'i is involved in war-making training and plans, the more it becomes a target for hostile actions--one thing leads to another.

On heavily populated Oahu, there is a need for these lands to be used for more constructive uses than military training, equipment storage, and weapons firing. Land is needed for agriculture--to make Hawaii more food-self-sufficient--and for housing, parks, and other constructive uses.

The people of Hawai'i have been more than generous to the Army and the other military branches in the past, but now it's time to put an end to these leases which are not the best use of these enormous tracts of land.

Given the U.S. government's role in the overthrow of the Hawaiian government in 1893 and the unilateral 1898 annexation and seizure of large tracts of Hawaiian land, the renewal of these leases on Oahu and of Pohakuloa on the Big Island is an unjustified continuation of an illegal occupation.

Thank you for considering our testimony.Aloha, John and Lucy Witeck, Honolulu, Hawaii XXXXX

Julia Withers

I oppose the leasing of these lands by the US military. It is an abomination that the military has leased these vast lands for decades for just $1. Allow Native Hawaiians to access their lands. Do not renew leases for the military on these lands for the good of O'ahu.

Anastacia Wolfgramm-Pineda

"I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... my family who are current residents of O'ahu deserve to live without worry of further descretation of our homeland. While many Kanaka Maoli struggle to live well on native lands, it isn't right for a foreign army to be permitted to "rent" and harm lands– especially for one US dollar. I would like to submit the follow comments regarding the Army's upcoming Environmental Impact Statement, which proposes to retain up to 6,300 acres of land on Oʻahu for military training purposes. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawaiʻi, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawaiʻi has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawaiʻi courts have also acknowledged the state's constitutional duty to mālama ʻāina. The leasing of ʻāina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ʻāina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on Oʻahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a "no action alternative" as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Waiʻanae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ʻāina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the "fair treatment of all people". Fair treatment means "no group of people should bear a disproportionate share of the negative environmental consequences". The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ʻāina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawaiʻi: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawaiʻi residents suffer from

psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities. These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Waiʻanae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities. Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Waiʻanae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands. In the Ching vs. Case ruling, the court found the state to have a trust duty to "mālama ʻāina" and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using. These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through moʻolelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access. Environmental justice (EJ) as defined by the EPA requires "meaningful involvement" of impacted communities such that "decision makers will seek out and facilitate the involvement of those potentially affected." Given the immense pressures that the COVID-19 pandemic has placed on our communit ies, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku.

Nancy Wond

No more leases of the Hawaiian Aina should be gifted to the US Military for the purpose of training and killing. Makua, Pohakuloa on Hawaii Island and the Kahuku Training Area are filled the remains of military ordnance. Clean it up and return the land!. This is the Land of Aloha. This land should never be used for the purposes of military training which is focused on the killing of others.Do not make our Federal and State Lands a giant target in the Pacific! This Pacific Military Buildup is a competitive game the US is justifying as a means to show US Military Might against China.We do not want our beautiful, precious and loving Hawaii to become a pawn in this ill conceived war game with China.

[redacted]

Sent from my iPhone

Deanna Wong

Give the native people their land back.

Troy Wong

I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... The US Military has no legal right to be here in a illegally occupied nation. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good.

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impact analysis by addressing cumulative effects in either an environmental assessment (EA) or an environmental impact statement. The EIS should employ this framework in order to address the cumulative effects of all related military activities, not just the proposed project.

US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities.

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Do what is right. You know the truth, stop living in the illusion of the US. We are not American

Jennifer Woo

Hello. The military cannot justify the vast use of Oah'u land. The military's presence is colonial in nature. The rental contract is one representation of their colonization: Misuse of the land and it's resources with insincere and meaningless transaction ($1).
Aloha!
Jen Woo

Symia Woodson

Hello, I am a resident of Tulsa, Oklahoma and my name is Symia Woodson. I am strongly against and oppose the extension of military leases on Hawaiian lands of Mākua, Kahuku, and Wahiawā. These lease extensions will lead to further damage of natural resources by the military in these areas. Due to US military occupation the natural habitat of native Hawaiian plants and animals will be destroyed. The local people and communities will also continue to be negatively impacted by US military presence.
The US army has leased these lands for $1 wrongfully since 1964. Once the lease expires in 2029, the land should be restored back to the public and community.

Georgette Woolsey

As a child of the 60's I can remember my dad driving us down towards Makua to see the military dropping paratroopers by the hundreds off Makua, watching them firing bombs in the mountains. We have seen the military marching these men's by the hundreds, trucks, tanks, jeeps, every vehicle they have has come through makaha. I have watched on TV, many Hawaiian people fighting to stop the bombing. today I see photos popping up over the internet of my neighbors, brother, and my dad standing in support of Makua. I Can say I am proud of them for showing up and standing for what's right. Most of us have left Makaha for many reasons, but will always be in support of what's is right for our Land on every island.I stand in support of returning MAKUA to its people of Hawaii.
Mahalo Ke Akua,Georgette Woolsey

Ang Woon

I urge the Army to cease leasing lands in Hawaii because of the likely environmental damage and because it encroaches on Indigenous Hawaiians' land and wellbeing.

Aree Worawongwasu

Aloha. I'm Aree Worawongwasu. I'm a Honolulu resident, a diasporaMon woman from Thailand and a Ph.D. student at the University of Hawai'i in Manoa. I'm speaking today in solidarity with kanaka maoli who demand the end of leases, the immediate start of cleanup, and the return of lands to worship to kanaka maoli. By all accounts, the United States and themilitary is illegally occupying the Kingdom ofHawai'i, which was unlawfully invaded by the U.S.Marines on January 16, 1893.This EIS is a sham. The U.S. military isthe world's largest polluter, creating 750,000 tonsof toxic waste every year in the form of depleteduranium, oil, jet fuels, pesticides, defoliants,lead, and other chemicals. The U.S. military's occupation anddesecration of Hawaiian land is being used to enactviolence all across the Asia-Pacific region,including my native homeland. It is misleading anddeceptive to present land back as a no actionalternative while giving all other alternativesnumbers. Not retaining the leases is not enough.The U.S. military must clean up its mess.As an indigenous woman, I also express aconcern for how militarization threatens the safetyof women and girls around the Pacific for sextrafficking and sexual exploitation. If you are actually concerned aboutenvironmental impacts, you would return the land tokanaka maoli and clean up your mess and de-occupyHawai'i now. For the future of the world, as the2021 IPCC report states, we have 16 months to solvethe climate crisis. This necessitates ademilitarized and independent Pacific.Long live the Kingdom of Hawai'i. Thatconcludes my comments for today. Mahalo.

Ann Wright

Hello this is Colonel Ann Wright that was 29 years in the US Army also a US diplomat for 16 years. I've lived here on Oahu for 20 years. I am solidly in favor of not releasing to the army, the lands that are up for the 33,000~30,000 acres. There's cultural sensitivity of keeping these lands in the hands of the military when they should be returned to the Hawaiian people. It is very, very important. I did not grow up here. I'm not Hawaiian, I am a haole who has served in the military for 29 years and I think it's time for the land to be returned to the people of Hawaii. Ann Wright. Thank you.

Colonel Ann Wright

Aloha O'ahu Army Training Land Retention (ATLR) EIS committee,

I spent 29 years in the U.S. military, 13 years on active duty with the U.S. Army and 16 years in the Army Reserves. I retired as a Colonel. I also was a U.S. diplomat for 16 years and served in U.S. Embassies in Nicaragua, Grenada, Somalia, Uzbekistan, Kyrgyzstan, Sierra Leone, Micronesia and Mongolia. I was on the small team that reopened the U.S. Embassy in Afghanistan in December 2001.

I have lived in Hawai'i for the past twenty years.

I want to emphasize the amount of community support for stopping the lease of the 30,000 acres of State of Hawai'i land that was leased in 1965 for $1 and leases that are coming to an end in 2029.

There have been three OPEDs and many letters to the editor have been printed in the Honolulu Star Advertiser.. and many more have been submitted. I am including them in my statement (see the attachment for all the OPEDs and Letters to the Editor) has they cover a range of the concerns of the community about the U.S. military retaining the leases on the 30,000 acres. These 30,000 acres have been a part of the incredible amount of acreage that the U.S. military uses on the Big Island with 133,000 acres on Pohakuloa Military Training Area and the four major military bases on O'ahu and the 4,370 acres at the Kawailoa/ Poamoho Training Area, 1,170 acres at the Kahuku Training Area and 760 acres at the Makua Military Reservation.

Having spent almost three decades in the U.S. military, I know from experience that military thinking is to get as much land as possible for training using the necessity of "national security" when in fact, the great expanses of land are not needed.

In the small state of Hawai'i, every acre is important and after 65 years of having essentially a free deal for 30,000 acres, it is time to return these 30,000 acres to the people of Hawai'i.

Thank you.

Ann Wright, COL, US Army/Reserves (Ret)

August 31, 2021

O‘ahu Army Training Land Retention (ATLR) EIS Comments
P.O. Box 3444
Honolulu, HI 96801-3444
E-mail: usarmy.hawaii.nepa@mail.mil

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[redacted]

[redacted]

Military should return Hawaii lands



COURTESY U.S. MARINE CORPS

U.S. Marines with Weapons Company, 1st Battalion, 3rd Marine Regiment, disembarked from an MV-22 Osprey during an Oct. 23, 2019, exercise at Pohakuloa Training Area.

Military should return Hawaii lands

By Ann Wright

The 65-year leases of 30,000 acres of Hawaii state land by the U.S. military are ending in 2029. The state of Hawaii should not re-lease these lands no matter what the amount the U.S. military offers.

The leases on 23,000 acres at Pohakuloa Training Area on the Big Island, 4,370 acres at the Kawailoa/Poamoho Training Area, 1,170 acres at the Kahuku Training Area and 760 acres at the Makua Military Reservation were given away essentially for free, with the state charging only $1 for each parcel for 65 years!

The three areas on Oahu are one-third of the 18,060 federal and state lands used for military training on the island, while the 23,000 acres at Pohakuloa are 17% of the 133,000 acres that comprise the largest military training area in the state and in the Pacific region.

We are subjected to a daily dose of the U.S. military build-up for what the OCCC jail and pre-release popula- is now.

disputes through military action — millions of persons dead and wounded, including tens of thousands of U.S. military, as evidenced by the wars in Viet Nam, Afghanistan, Iraq and Syria.

Ultimately disputes with countries are resolved not by military action, but by dialogue, so why are we spending trillions on weapons that ultimately do not solve the situation?

AS RESIDENTS of Hawaii, I think we should want to be known as an area of peace and dialogue using the Hawaiian technique of "ho'oponopono" — rather than as a base for projecting the U.S. propensity for killing over using diplomacy to reduce tensions with other countries.

A first step would be reducing the

ISLAND VOICES



Honolulu resident Ann Wright was in the U.S. Army/Army Reserves for 29 years and retired as a colonel; she was also a U.S. diplomat until resigning in March 2003 in opposition to the U.S. war on Iraq.

The U.S. Army is seeking public comments on the environmental impact statement (EIS) concerning the re-leasing proposal by Sept. 1.

You can email comments to: usarmy.hawaii.nepa@mail.mil or go online to fill in the form at https://home.army.mil/hawaii/index.php/OahuEIS. Comments may also be mailed to: Oahu ATLR EIS Comments, P.O. Box 3444, Honolulu, HI, 96801-3444.

Attending public hearings this week is another way to be heard. Hearings are set for Tuesday and Wednesday, 6-9 p.m., at Leilehua Golf Course; they will be livestreamed at www.youtube.com/usaghawaii/live.

Oral comments may be provided by attending one of these two in-person public scoping meetings, or re-

ISLAND VOICES

By Ann Wright

August 8, 2021

Honolulu Star Advertiser

https://printreplica.staradvertiser.com?selDate=20210808&goTo=E03&artid=3

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We are subjected to a daily dose of the U.S. military build-up for what the Indo-Pacific command is calling "our enemy China." We know what happens when the U.S. tries to resolve disputes through military action — millions of persons dead and wounded, including tens of thousands of U.S. military, as evidenced by the wars in Viet Nam, Afghanistan, Iraq and Syria.

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AS RESIDENTS of Hawaii, I think we should want to be known as an area of peace and dialogue using the Hawaiian technique of "ho'oponopono" — rather than as a base for projecting the U.S. propensity for killing over using diplomacy to reduce tensions with other countries.

A first step would be reducing the U.S. military footprint in Hawaii by refusing to re-lease 30,000 acres currently used by the U.S. military.

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Honolulu resident Ann Wright was in the U.S. Army/ Army Reserves for 29 years and retired as a colonel; she was also a U.S. diplomat until resigning in March 2003 in opposition to the U.S. war on Iraq.

Dennis Francis
Lucy Young-Oda
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529-4831
Stephen J. Downes
Editorial Page Staff
Maureen O'Connell / Vicki Viotti
Dennis Francis
Larry Johnson
Jeffrey Watana
Michael Wo

End military land leases, militarism; invest in peace ins

ISLAND VOICES





Ellen-Rae Cachola, left, is an ethnic studies instructor at the University of Hawaii-Manoa; Kim Compoc, center, is an assistant professor of history at the UH-West Oahu; Darlene Rodrigues is an Oahu resident and master's of divinity student at Claremont School of Theology.

By Ellen-Rae Cachola, Kim Compoc and Darlene Rodrigues

We are Decolonial Pin@ys, a Honolulu-based organization of Filipinas concerned about the protection of the Hawaiian islands, the Philippine islands, and all peoples under U.S. military occupation. We submit this statement to express our solidarity with kanaka maoli who demand an end to the military leases at Kahuku, Pohakuloa, Poamoho, and Makua so that a proper cleanup can begin.

The "training," as the military calls it, is a disgrace. What use are live-fire explosions, military helicopters, or other instruments of mass death? Militarism means toxic contamination for generations, desecrating the land, and disrespecting the indigenous culture. Militarism only perpetuates poverty and misery here, in the Philippines, and all over the world.

We want to protect these islands. The military's version of "protection" begins with the backhanded compliment that our islands are "strategically located" to advance "U.S. interests" in the "Indo-Pacific region." We do not subscribe to the U.S. military version of security and protection, which is really an agenda of endless war and corporate extraction. We want the military out of these islands so we can build a green economy based on genuine security, survival and peace.

As Filipinas, we stand with the Hawaiian people because we, too, have suffered under U.S. colonial occupation. We know what it is to have no say over your lands, your economy, or your destiny as a people. As the late Haunani-Kay Trask wrote, "[To the U.S.], Hawai'i, like a woman, is there for the taking." We say, no more of this madness.

The Philippines has so much to teach about language diversity, religious diversity and resilience of indigenous cultures. But the U.S. military is not interested in democratic movements to protect all that is beautiful in the Philippines. The U.S. uses Philippine land for "joint military training exercises," as many as 281 in 2020, not including RIMPAC "war games" that take place here every other year.

Just recently the U.S. approved $2 billion in military weapons sales to the Philippines, a grotesque sum given the ongoing human rights crisis that most affects indigenous people, farmers, journalists and anyone brave enough to prioritize land and people over corporate profits.

We know the military expansion in Hawaii will worsen the crisis in the Philippines. That is why we say: Stop stealing Hawaiian land and end the military leases. Stop the multibillion-dollar sale of weapons to the Philippines, and stop funding the killings. Stop U.S. "war games" on all our precious islands. Stop "red-tagging" everyone who wants a chance at a decent life for their families.

If we listen to indigenous land protectors, we can build a brilliant future, but that means putting common sense at the forefront.

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COMMENTARY

Precarious Afghan economy will challenge Taliban lead

By Bobby Ghosh

No sooner had the Taliban taken Kabul than questions began to be asked about how they would manage Afghanistan's economy. Do the insurgents-turned-rulers have the skills to run, say, a modern finance ministry and central bank? Will foreign donors trust them with aid? Can they do business with investors interested in the country's mineral wealth?

Throughout their two decades in the wilderness, the Taliban have shown themselves capable of generating resources to maintain an insurgency, mostly from the drug trade, illegal mining and donations from supporters abroad, but also from taxes and rents in areas under their control. In good years, the Taliban's revenues amounted to upwards of $1 billion.

But the Afghan budget is more than five times that size. The country's gross domestic product, estimated at $22 billion, has grown nearly threefold since the Taliban were driven from power in 2001. And the economy has for several years been in precarious health, propped up by foreign aid. By the World Bank's reckoning, three-fourths of the government's budget is funded by international donors, led by the U.S.

Managing that economy has been a cohort of Afghan technocrats, many of them Western-educated or trained. Very few of them are expected to remain in the country, despite the Taliban's promise of "amnesty" for anyone who worked with the deposed government.

The most urgent economic challenge for the new rulers, then, is a yawning skills deficit in government ministries and departments. The Taliban will struggle to find ministers and administrators whom foreign donors and investors can trust.

Right now, new donors or investors are not inclined to trust the Taliban anyway. The Biden administration has frozen $9.5 billion in the Afghan central bank's assets and halted shipments of cash to the country; European governments have suspended development aid; and the International Monetary Fund has cut off access to Afghanistan's special drawing rights.

Western governments, multilateral agencies and donors will slap strict conditions on the resumption of funding. Aid will be predicated on the Taliban preserving many of the freedoms — especially for women — introduced in their absence, and on preventing the resurgence of terrorist groups such as al-Qaeda.

Western investors will take their cues from their governments, paying heed to economic sanctions. They will also be influenced by public perceptions: Most U.S. and European companies will be mindful of the likely domestic backlash against doing business, directly or otherwise, with the Taliban.

Might non-Western investors feel unconstrained by such considerations? There has been some speculation that China and Russia are keen to fill the vacuum created by the American withdrawal. Beijing, especially, is thought to have its eye on Afghanistan's mineral deposits, worth anywhere from $1 trillion to three times as much.

Beijing and Moscow have plenty of security concerns about Afghanistan that will motivate them to engage closely with any Taliban-led government in Kabul, but serious investment is another matter altogether.

Chinese banks and companies are less risk-averse than their Western counterparts, but they tend to be leery of unstable economies. The experience of Venezuela, where Chinese loans are having to be renewed simply to avoid huge writedowns, is a cautionary tale for investors.

Although Beijing has talked a good game about investing in Afghanistan for some years now, very little money has materialized. The showpiece Chinese venture, a $2.8 billion copper project funded by the state-owned Metallurgical Corporation of China at Mes Aynak, near Kabul, has long since stalled.

The infrastructure requirements for extracting Afghanistan's mineral wealth are huge: The country is severely lacking in transportation networks, for instance. Getting the minerals out of the ground and into China would require investments of a magnitude larger than the Mes Aynak project. Chinese investors have other, safer places to put down that kind of money.

The Taliban may covet Chinese aid, but they will have to compete with governments across the developing world, most notably in Africa. For its part, Russia is hardly the most generous aid giver, trailing far behind the world's richest

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Page 06

*Bobby Ghosh is a B
ion columnist who
affairs, focusing on
and Africa.*

End military land leases, militarism; invest in peace instead

By Ellen-Rae Cachola, Kim Compoc and Darlene Rodrigues We are Decolonial Pin@ys, a Honolulu- based organization of Filipinas concerned about the protection of the Hawaiian islands, the Philippine islands, and all peoples under U.S. military occupation. We submit this statement to express our solidarity with kanaka maoli who demand an end to the military leases at Kahuku, Pohakuloa, Poamoho, and Makua so that a proper cleanup can begin.

The “training,” as the military calls it, is a disgrace. What use are live-fire explosions, military helicopters, or other instruments of mass death? Militarism means toxic contamination for generations, desecrating the land, and disrespecting the indigenous culture. Militarism only perpetuates poverty and misery here, in the Philippines, and all over the world.

We want to protect these islands. The military’s version of “protection” begins with the backhanded compliment that our islands are “strategically located” to advance “U.S. interests” in the “Indo-Pacific region.” We do not subscribe to the U.S. military version of security and protection, which is really an agenda of endless war and corporate extraction. We want the military out of these islands so we can build a green economy based on genuine security, survival and peace.

As Filipinas, we stand with the Hawaiian people because we, too, have suffered under U.S. colonial occupation. We know what it is to have no say over your lands, your economy, or your destiny as a people. As the late Haunani-Kay Trask wrote, “[To the U.S.], Hawai‘i, like a woman, is there for the taking.” We say, no more of this madness. The Philippines has so much to teach about language diversity, religious diversity and resilience of indigenous cultures. But the U.S. military is not interested in democratic movements to protect all that is beautiful in the Philippines. The U.S. uses Philippine land for “joint military training exercises,” as many as 281 in 2020, not including RIMPAC “war games” that take place here every other year.

Just recently the U.S. approved $2 billion in military weapons sales to the Philippines, a grotesque sum given the ongoing human rights crisis that most affects indigenous people, farmers, journalists and anyone brave enough to prioritize land and people over corporate profits. We know the military expansion in Hawaii will worsen the crisis in the Philippines. That is why we say: Stop stealing Hawaiian land and end the military leases. Stop the multibillion- dollar sale of weapons to the Philippines, and stop funding the killings. Stop U.S. “war games” on all our precious islands. Stop “red-tagging” everyone who wants a chance at a decent life for their families.

If we listen to indigenous land protectors, we can build a brilliant future, but that means putting common sense at the forefront.

The fight for genuine freedom and democracy must mean that land, water, and traditional foodways are accessible, especially to indigenous people who have stewarded these lands for centuries.

WE DEMAND the taxes that we pay to go to government budget line items that genuinely promote “life, liberty, and the pursuit of happiness”: education, housing, health care and transportation. Governments must honor the social contract by providing for the people and care for the ecosystem we depend on.

We can build a climate-resilient economy in Hawaii, but that means defunding the military-industrial complex, decommissioning military use of land in Hawaii, and cleaning it up so it can be returned to the community for nonviolent uses. We need the U.S. to replicate the cleanup in the Philippines, and in the rest of the U.S.-occupied Pacific, so the world can be protected, too.

ISLAND VOICES

Ellen-Rae Cachola is an ethnic studies instructor at the University of Hawaii-Manoa; Kim Compoc, center, is an assistant professor of history at the UH-West Oahu; Darlene Rodrigues is an Oahu resident and master’s of divinity student at Claremont School of Theology.

August 26, 2021

Honolulu Star Advertiser

keeping our keiki safe and getting them back in school.

We respect an individual's right to be vaccinated. As private businesses, nity that can be vaccinated as soon as possible.



U.S. MARINE CORPS VIA ASSOCIATED PRESS

Finnish coalition forces assisted evacuees for onward processing during an evacuation at Hamid Karzai International Airport in Kabul, Afghanistan, on Aug. 24.

Replace wasteful wars with diplomacy

By David Strand

ISLAND VOICES



David Strand, of Aiea, is a retired immigration attorney.

I am deeply appreciative and grateful that our president has shown the courage and fortitude to finally end our military involvement in Afghanistan. I am distressed that he has been subject to criticism from across the political spectrum by Monday-morning quarterbacks who profess to know better how to bring peace. It is estimated that approximately 170,000 people have been killed during the last 20 years of conflict, almost one-third of them civilians.

Withdrawal will certainly entail some fatalities, but America's contribution to the carnage, thankfully, is almost done.

Hopefully our withdrawal will lead to a diminution of our military presence throughout the world, and an increase in utilizing diplomacy in our foreign affairs. I believe that our reliance on the military is not in our national interest and generally harmful to the world for the following reasons:

1. The results of our military interventions during the last 70 years have generally been counterproductive. They have exacerbated unrest in the the Middle East and elsewhere and diminished our international reputation

portion of victims are innocent noncombatants, including children and the elderly. While it is always possible that military action will do at least some good, we know for certain that it will always bring absolute evil to the innocent victims of "collateral damage." American manufactured arms proliferate, enhancing the lethality of combatants.

3. War destabilizes the world. Refugees proliferate, resulting in suffering to the refugees themselves as well as often chaos to the societies where they seek refuge, diverting government priorities and encouraging xenophobia among the population of the host societies.

4. War diverts our attention and resources from dealing with domestic issues, from climate change to homelessness, from schools and education to our crumbling infrastructure, to economic development. Non-military public service options, such as the Peace Corps and AmeriCorps, suffer.

5. War increases the power and respectability and influence of the military and military leadership. We are encouraged to believe that it is desir-

customed to multiple problems resulting from military activity: sexual assault within the armed services, homeless veterans, PTSD, environmental degradation, and militarization of police with excess military hardware, to name a few.

I fear that the current positive media spin on significant ongoing military build up in Hawaii suggests that we have not changed. China has moved into position as our seemingly necessary perpetual enemy. We spend more on our military than the next few countries combined. We have a great many military bases around the world and troops stationed in more than 100 countries. China has only one base in a foreign country. We fail to understand that China's Belt and Road initiative and other non-military international development efforts are where the Chinese are outpacing us. I wish that our competition would focus on spreading prosperity throughout the world.

Unfortunately war profiteering by arms manufacturers and others contribute to our emphasis on the military, just as weapons manufacturers

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Hopefully our withdrawal will lead to a diminution of our military presence throughout the world, and an increase in utilizing diplomacy in our foreign affairs. I believe that our reliance on the military is not in our national interest and generally harmful to the world for the following reasons: 1. The results of our military interventions during the last 70 years have generally been counterproductive. They have exacerbated unrest in the the Middle East and elsewhere and diminished our international reputation and standing.

2. Bombing in particular and war in general always result in bringing death, serious injury, and dislocation to innocent people. A substantial proportion of victims are innocent noncombatants, including children and the elderly. While it is always possible that military action will do at least some good, we know for certain that it will always bring absolute evil to the innocent victims of "collateral damage." American manufactured arms proliferate, enhancing the lethality of combatants.

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schools and education to our crumbling infrastructure, to economic development. Non-military public service options, such as the Peace Corps and AmeriCorps, suffer.

5. War increases the power and respectability and influence of the military and military leadership. We are encouraged to believe that it is desirable to reallocate our priorities so that the financial requirements of the military overshadow domestic needs. We more readily accept curtailment of our civil liberties. We become accustomed to multiple problems resulting from military activity: sexual assault within the armed services, homeless veterans, PTSD, environmental degradation, and militarization of police with excess military hardware, to name a few.

I fear that the current positive media spin on significant ongoing military build up in Hawaii suggests that we have not changed. China has moved into position as our seemingly necessary perpetual enemy. We spend more on our military than the next few countries combined. We have a great many military bases around the world and troops stationed in more than 100 countries. China has only one base in a foreign country. We fail to understand that China's Belt and Road initiative and other non-military international development efforts are where the Chinese are outpacing us. I wish that our competition would focus on spreading prosperity throughout the world.

Unfortunately war profiteering by arms manufacturers and others contribute to our emphasis on the military, just as weapons manufacturers inhibit domestic gun control.

I wish I knew an effective strategy to influence our government to pursue peace with the energy with which we prepare for war.

David Strand, of Aiea, is a retired immigration attorney.

August 29, 2021
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LETTERS TO THE EDITOR

Military exercises raise tensions, risks

The article, “Modern warfare” (Star-Advertiser, Aug. 15), reported on Large Scale Exercise 2021, the most massive U.S. war exercise in a generation. The article’s intent is apparently to reassure and comfort us.

This reader is anything but encouraged. It was chilling to read that this massive deployment of ships and aircraft around the Pacific and beyond is really a rehearsal for “deep strikes into enemy territory” in the future. And “high-end conflict,” of course, is a way of avoiding saying, “World War III,” which would immediately turn into a nuclear war.

And Hawaii, the U.S. Pacific military nerve center and prime target for intercontinental missiles? It is quite probable that a nuclear war would extinguish all life in the Hawaiian Islands.

Rather than increasing our safety and security (which also depends on the Chinese and Russians also feeling safe and secure), Large Scale Exercise 21 will intensify the arms race and increase tensions. Let’s concentrate on building peace.

Noel Kent

August 29, 2021

Honolulu Star Advertiser

https://printreplica.staradvertiser.com?selDate=20210829&goTo=E02&artid=1

Protest military leases of Hawaiian lands

Ann Wright’s comments are right on (“Military should return Hawaii lands,” Star-Advertiser, Island Voices, Aug. 8).

Hawaii should not re-lease 30,000 acres of its beautiful and valuable land to the U.S. military seven years from now.

The Hawaiian protesters at Mauna Kea also should object to any renewal of leases of lands at Pohakuloa, Kawailoa/ Poamoho, Kahuku and Makua.

“Malama aina!” should be their rallying cry, to care for and nurture the lands instead of using them for purposes of war.

Ed Kuba

Kapahulu
Star Advertiser, August 28, 2021
https://printreplica.staradvertiser.com?selDate=20210828&goTo=A12&artid=1

War profits only those who make the weapons

Following in the footsteps of the British and Russians, Americans and their allies are the latest to learn the hard lesson of challenging Afghanistan's reputation as the "graveyard of empires."

In its retreat, the United States also is contributing heavily to the land's "graveyard of weapons," leaving behind billions of dollars in armaments for the Taliban, ISIS, or others falling heir to the abandoned treasure.

The Indian author, Arundhati Roy, wrote: "Once weapons were manufactured to fight wars; now wars are manufactured to sell weapons." The world's arms merchants are not lamenting our Afghanistan loss; they are gearing up for the next in an endless chain of wars, for which we appear to be manufacturing yet another enemy.

If the string of recent reports by Star-Advertiser military reporter, William Cole, is any indication, that next war may be with China.

If we think Afghanistan has been a disaster, let us think twice before leaping into the China abyss.

Surely there are diplomatic channels more productive than wasting additional billions on weapons of war.

Wally Inglis
Palolo Valley
August 25, 2021
https://printreplica.staradvertiser.com?selDate=20210825&goTo=A10&artid=3

End military's leases on Hawaiian lands

I support retired colonel Ann Wright's opinion ("Military should return Hawaii lands," Star-Advertiser, Island Voices, Aug. 8).

America's military action has not settled any disputes, only imposed undue hardship and destruction on other cultures and our own military personnel, while destroying Hawaiian land.

I looked at beautiful Makua Valley, and thought: How can there be any justification for the shelling by the military? That goes for any area of our islands.

Peace and diplomacy are the only avenues with other countries. Stop polluting our land, oceans, air and the environment with unnecessary military training. No more leasing of Hawaii land to the military.

Patricia Blair
Kailua
August 11, 2021
Star Advertiser Honolulu
https://printreplica.staradvertiser.com?selDate=20210811&goTo=A10&artid=3

Question Army's plans to renew land leases

Speak up, Hawaii! The military has retained leases on 23,000 acres at Pohakuloa Training Area on Hawaii island, 4,370 acres at the Kawailoa/ Poamoho Training Area, 1,170 acres at the Kahuku Training Area and 760 acres at the Makua Military Reservation for 65 years, with the state charging only $1 for each parcel ("Secretary of Army supports training ground lease renewals," Star-Advertiser, Aug. 10).

It's far past time that the people of Hawaii question this, and now is the time, with the leases running out in 2029. The U.S. Army is seeking public comments by Sept. 1 on the environmental impact statement (EIS) concerning the re-leasing proposal. Email comments to: usarmy.hawaii.nepa@mail.mil, or use the online form at home.army.mil/hawaii/index.php/oahueis/ project-home. Comments may also be mailed to: Oahu ATLR EIS Comments, P.O. Box 3444, Honolulu, HI, 96801-3444.

A public hearing today from 6-9 p.m. at Leilehua Golf Course will be livestreamed at www.youtube.com/ usaghawaii/live.

Mele Stokesberry
Kula, Maui
August 11, 2021
Star Advertiser Honolulu
https://printreplica.staradvertiser.com?selDate=20210811&goTo=A10&artid=3

Ann Wright

This is Ann Wright. I'm a former -- I'm a retired U.S. Army colonel, 29 years in the Army, and a former U.S. diplomat. I've lived here in Hawai'i for 20 years. I certainly appreciate, you know, the role of the military. I was in it for a long time.
But I think the numbers of acres that the U.S. military, and particularly the Army, has is way too much. And the opportunity for 30,000 acres to be returned to the people of Hawai'i is certainly needed. Thank you very much.

Tom Wright

Please, just leave Hawai'i. The American military has no business here. But, as you leave, please clean up your mess! —all the depleted and unexploded ordnance. You are not welcome and you never were.
Sincerely,
Tom Wright

William Wu

Aloha,My name is William Wu, and I am a resident and citizen of the United States of America. I am strongly against and I strongly oppose to the extension of military leases on the lands of Makua, Kahuku, and Wahiawa. An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of native Hawaiian plants and animals, and continually disrupt the lives of the local community. The army has wrongfully leased these lands from the state for 1$ since 1964. When the lease expires in 2029, this land should be immediately restored to the public. Sincerely William Wu

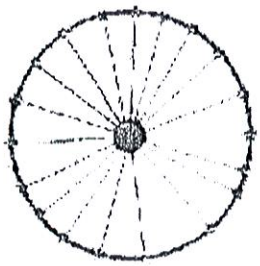
Melissa Wyant

Hello,
My name is Melissa Wyant. I am a resident of Ohio. I am strongly opposed to the extension of military leases on the lands of Mākua K'ahuku, W'ahiawā.
An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals, and continually disrupt the lives of the local community.
The army has wrongfully leased these lands from the state for $1 since 1964. When the leases expire in 2029, this land should be immediately restored to the public.
With dissent,
Melissa

Seiji Yamada

My name is Seiji Yamada. I speak to you from Mililani in Ka Pae 'Aina, as Kekuni Blaisdell taught me to say. Seems to me, Colonel Misigoy, that you must be feeling like an embattled commander at the outpost of the empire surrounded by angry natives, because that is what the U.S. is, Colonel -- an empire. Japanese people know what it means to be imperialist, because in the first half of the 20th century, the Japanese took over much of Asia and the Pacific, killing, raping, and subjugating other people. When I visit much of Asia, people want to be sure that I know that history. My understanding of the Japanese empire grinds the lenses by which I can see the U.S. empire. It ended badly for the Japanese. We just commemorated 76 years since the atomic bombing of Hiroshima and Nagasaki. I was born in Hiroshima. As we walked around town, my grandfather showed me the shadow of a man burned into granite. He told me that the Japanese are for peace because they know the stupidity of war. As racist as the Japanese empire was, the fire bombing of all the cities in Japan is evidence that for the U.S. empire, the Japanese were vermin, sub-humans, to be incinerated as efficiently as possible. As Gil Scott-Heron said, "Peace is not the absence of war, it is the absence of the rules of war and the threats of war and the preparation for war." The U.S. military is using Hawai'i to prepare for war. Star-Advertiser always has stories on how the U.S. is preparing for war with China or Russia or both at the same time. What madness is this! The doomsday clock is no longer counting down minute by minute. We are now down to 100 seconds to midnight. Intergovernmental Panel on Climate Change released its most recent report on August 7th. It tells us that the world is on fire. We don't need bombs and missiles and death stars to set the world aflame. The world is on fire already. What we need now is to work out how to get rid of... What we need now is to work out how to get rid of nuclear weapons, how to stop burning fossil fuel, how to develop green technology all over the world. Other than the kanaka maoli, the rest of us are here as guests. No one wants guests that threaten to kill people. It is time for the U.S. military to stop occupying Hawai'i. Thank you.

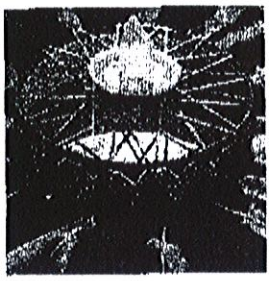
Sharing a different perspective of land usage with you. Please read with care,



Medicine Wheel Ceremony.

Both can work; the Will to take action is needed

Over the last year Bennie LeBeau has become aware of many profoundly distressing changes in the land and the animals at Yellowstone National Park. These changes are becoming even more ominous right now, he says, and they have have prodded him into direct action to bring his vision alive.



The huge Medicine Wheel Ceremony that Bennie envisions is intended to be a mass spiritual event involving people of all colors and spiritual traditions. The ceremony will begin at Sunrise on Saturday, May 8, 2004 and end at Sunrise on Sunday, May 9, 2004. This ceremony will be taking place at more than 20 sacred sites in the American West, and at many sacred sites around the world, including Australia, Ecuador, Guatemala, and the Middle East.

The Grand Teton peaks in Wyoming -- The Four Grandmothers Standing Tall -- will serve as the center of this Medicine Wheel. The perimeter will extend out in a hoop 600 miles or more in radius, enveloping the long spine of the Rocky Mountains. Simultaneous prayer ceremonies at other sacred sites around world will help to re-activate and re-attune the web of subtle energy pathways that wrap around planet earth.

To see other images of the Medicine Wheel and mountains go to Chiron Communiqué ~ Steve McFadden

"All nations, all peoples are invited to participate," Bennie says, adding, "all nations, all peoples are needed to work together on this -- the black, white, yellow, and red nations of Mother Earth."

A Medicine Wheel is an ancient spiritual tool with a history of widespread use all over Turtle Island (North America). Stones are set to mark the Four Directions of North, South, East and West, and also of other major points. In this manner, if done with knowledge and respect, a sacred space is defined. Within that space, the people can direct thoughts, feelings and actions toward a unified idea. The Medicine Wheel also helps people to be grounded physically, to properly orient to the Four Directions, and thus to have a clear sense of where they are. That foundation of stability gives a reliable base for high spiritual work.

* **"The Earth is drastically out of balance now," Bennie LeBeau says. "This Medicine Wheel ceremony will strive to re-set the basic tone -- or vibrational pattern -- of the West, and by extension help to re-attune the whole of the earth."**

Message for the Peacekeepers

I met Bennie LeBeau in Placitas, New Mexico on February 9, 2004. He had driven down from Wyoming to meet with some members of group called the Spiritual Elders of Mother Earth, a network of indigenous people from 21 different tribes in North, Central, and South America.

The elders began coming together as a group in 1999 in response to the global crises of environment and culture. Their traditional teachings have long warned that such crises would arise.

The elders say they understand from their traditions that part of their original instructions as human beings was to serve as particular keepers of the Earth. They were given basic responsibility to care for the Earth, as you would care for your mother.

Their nations, they say, were also instructed that one day they would have to step forward in a time of extreme crisis to show a pathway of respect for the Earth and all the creations who share life upon her. The native people would need to educate other people in how to respect and restore balance to our common foundation -- the Earth.

Bennie LeBeau was born on the Wind River Reservation in Wyoming in 1950, and is an enrolled member of the Eastern Shoshone tribe. He served in the U.S. Air Force in Vietnam in the early 1970s. In the years after his military service, he supported himself mainly through outfitting, taking people out fishing and hunting in the mountains.

Bennie told me that he began to have visions when he was in his late 20's, while guiding hunters along the Continental Divide that weaves North and South along the Rocky Mountain spine. Bennie went to the local Medicine People to ask for help in understanding, but they were unable to offer interpretations. So Bennie lived with the visions.

Bennie told me that he eventually came to understand on his own what his dreams and visions meant: "The land is out of balance. The bio-electric energy of the earth is being profoundly scrambled and disturbed by mines, electric transmission lines, railroads, highways, damming of the rivers, and also from development of factories, trucks, cars and so forth. War is adding to this."

"It's time to do something important, to reconnect the energy. So many sacred sites are not kept, not tended. But this is what is needed, for things are out of balance, out of harmony. It's extreme now, and it's time to come together around this, the old ways and the new ways. Every human being has a stake in this, no matter their

color or their spiritual tradition."

Talking with the Elders

To bring this massive, multi-tradition Medicine Wheel ceremony about, Bennie has been inspired to travel and talk with representatives of the indigenous Nations near the waters and mountains of his vision, and also with other cultures. He began his journey in January, 2004. "I am to ask for assistance in re-activating these sacred sites," he explained. "We must all do our parts as humans to bring about harmony."

On Feb. 10, 2004 -- the day after I met with him -- Bennie journeyed west to the Turquoise Mountain (Mount Taylor near Grants, New Mexico). This is one of the sacred mountains that mark the Four Corners area of Turtle Island (North America). Turquoise Mountain is a massive dormant volcano, towering more than a mile above a vast desert plateau.

With Leon Secatero of the Canoncito Navajo, a Grandelder for the Spiritual Elders of Mother Earth, and Red Eagle from the Cherokee Nation, Bennie visited with the traditional keepers of Turquoise Mountain: Navajo Grandfather Martin Martinez and his wife, Grandmother Janíce.

Bennie told them of his dreams and visions, and also of his plan. Grandfather Martin, who is in his 90s, was pleased to hear it. He told Bennie that his visions were in harmony with the Navajo teachings and prophecies that he keeps. He also mentioned that his wife, Janíce, had a vision four years ago of a multi-tradition ceremony to be held near a holy spring on Turquoise Mountain. She wanted to realize her vision.

As it happens, in the context of the 600-mile radius of the Medicine Wheel of Bennie LeBeau's vision, the Turquoise Mountain of New Mexico is in the South position, the South Mountain.

In the Medicine Wheel teachings of Turtle Island the South is a direction sometimes represented by Mouse. Mouse is so small and defenseless against the rest of the world that he must rely on trust and instinct to live. Much larger forces of Spirit are at work in the world, and Mouse understands how humble creature he is in relation to all this. But good and surprising things can happen when trust inspires Mouse to make a bold move.

"This was prophesied a long time ago," Grandfather Martinez told Bennie and the other elders. "I am glad you have come and taken responsibility to be a messenger."

"The mountain is the pillar, our helper," Grandfather Martinez said. "It listens to us when we are in harmony with the stones, trees, clouds, waters, and stars. This is the wholeness that keeps life together. We will communicate with the mountain."

Grandfather Martin gave Bennie his blessings to go forward and make his Medicine Wheel Ceremony a reality. He said it was a good mission and that now is the time.

All the elders traveled up onto the flank of Turquoise Mountain after their meeting. There by a sacred spring they made ceremony together to prepare for May 8. Grandfather Martinez also initiated the drum that Bennie had made for himself, a drum laced with symbols representing the Medicine Wheel ceremony.

Grandfather Martinez shared with his guests some of the Navajo lore about Turquoise Mountain -- the South Mountain of the four sacred mountains of the Navajo, known to them as "Tsoodzil", the Blue Bead Mountain. (Turquoise Mountain is sacred to several other native groups as well; all have been invited to the May 8 ceremony).

Grandfather Martinez said there were giants on the mountains in the old days, and they were the guardians. Some were good, and some were not. The giants have gone, but their energies are still around, and a lot of it is negative energy. The negative energies and entities are coming back strong now, and it is affecting the people.

"We need to do ceremonies continually to strengthen and cleanse and empower," Grandfather Martinez said. "It is very important to do this now. The ceremonies help to keep the negative forces at bay."

Grandmother Janice told the circle of elders that the ceremony would put in place another set of vibrations. "The ceremony will happen at a time in the spring when all the plants are surging with new life," she said. "If we come together in respect with the plants, she said, we can use this energy to help bring about the intention of the ceremony."

Grandfather Martinez spoke of the Medicine Wheel ceremony as a universal wake up call. The mountain ranges have sovereignty over lines of energy that radiate around the entire earth. Thus, he said, the ceremonies we do encircling the Rocky Mountains will radiate out to other points.

Grandfather noted that many people and groups do things individually, their rituals or ceremonies. "That's okay," he said, "but right now Mother Earth and all the living things upon her have need of something more --

something where all the people are together and of one heart, one mind."

The May 8 ceremony that the elders have envisioned for the South Mountain, Turquoise Mountain, is to be a Blessing Way. That is how it will happen. Drums and singers from many nations will pass the song from sunrise on May 8 until sunset, and some may choose to sing in the night. "We will also be calling all our ancestors to be with us in this ceremony," Leon Secatero said, "that we may all reconnect with our ancestors."

There will be a particular emphasis when High Noon comes to the Four Grandmothers Standing Tall (the Grand Tetons in Wyoming). That is when ceremonies in the entire Medicine Wheel will also be putting a focus on being of one mind and heart, expressing their gratitude for Creation by elevating the level of vibration to its peak at High Noon.

For the elders of Turquoise Mountain in the South, the ceremony will also mark the starting time of an effort to establish a permanent public park on part of thier ancestral lands, so that people can go there to pray and make ceremony when they feel called. They also envision a healing center

While Bennie initially saw the massive Medicine Wheel ceremony-taking place over a 600-mile radius, reaching out from the center point of the Four Grandmothers, Grandfather Martinez saw it more globally. They came to agree that everyone who chooses to participate, at whatever holy sites are accessible to them anywhere in the world, would be invited and welcomed.

Story Continued ~ Page 2

RESOURCES
Site created, sponsored and supported by Lana Feldman, OWOL Corp.
This site will post updated information on the May 8, 2004 Ceremony.

Spiritual Elders of Mother Earth
http://www.spiritualelders.org

Protocol For Turquoise Mountain Ceremony
Grandfather Secatero and elders established this Protocol for Turquoise Mt Ceremony. We invite you to consider observing such protocol, if it feels appropriate for you.

Buffalo at Yellowstone
http://www.wildrockies.org/buffalo/native.html
http://www.wildrockies.org/buffalo/speak/danB2.html



[redacted]

HONOLULU HI 967

3 AUG 2021 PM 2 L



Oahu ATLR EIS Comments
PO Box 3444
Honolulu 96801-3444

96801-344444

Kami Yamamoto, MPH

Aloha, my name is Kami Yamamoto and I am a resident of Wahiawa. I am strongly opposed to the extension of the military leases on the lands of Makua, Kahuku, and Wahiawan. The extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals, and continually disrupt the lives of the local community, especially Native Hawaiians. The army has wrongfully leased these lands from the state for $1 since 1964. When the leases expire in 2029, this land should be immediately restored to the rightful ownership of the public, especially Native Hawaiian people.

Kerry Yamauchi

As a Native Hawaiian, I am here today to submit testimony to demand that "NO ACTION" be taken and the leases in question be allowed to expire, come 2029. The US military has desecrated our beautiful 'āina over and over, and consistently refuses to take accountability for the social and environmental degradation left in its wake. I'm not going to try to explain the reverence that Kānaka Māoli have for this land during this public engagement process, because if you live here you should have already be familiar with indigenous concepts of aloha 'āina, out of RESPECT for the original stewards of this land and their descendents. Of whom, if I may add, there are over 40,000 waiting to receive land that is rightfully theirs from the state. Kānaka Māoli belong in the social, political, and economic position to manage this 'āina, for agriculture, for housing, and for cultural practice. And it is the responsibility of the US military to relocate its facilities and return the lands in question to the Native Hawaiian hands they were stolen from. You guys can keep your one dollar, but you must return the 6,300 some acres of land.

Toni Yardley

NO RETENTION
IT'S TIME FOR REMEDIATION
CLEAN UP THE DAMAGES
AND PRACTICE IN INDO-CHINA

re·me·di·a·tion
noun
the action of remedying something, in particular of reversing or stopping environmental damage.

LeaDan Yee

I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... I am kanaka and even with a VA loan upon retirement, we can barely afford land of our own. My parents, both retired,, my dad is also a veteran, cannot afford a home. My brothers, who are now raising their own children cannot afford land. If the military continues their lease, then they should also pay market value for the land to help residents with the cost of housing. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on Oʻahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts.
Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawaiʻi, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawaiʻi has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawaiʻi courts have also acknowledged the state's constitutional duty to mālama ʻāina. The leasing of ʻāina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ʻāina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good.

Niyah Yisrael

I really think this land should be returned to Native Hawaiians. They live and thrive off of it and it's only right. This is an illegal occupation and against the feelings of the native inhabitants

Bean Yogi

As someone with generations of settler roots in Hawai'i, I join Kanaka Maoli and others around the world who oppose the renewal of the US Army's lease of Hawai'ian land for ATLR -- and in fact, for all military purposes. The violence caused by the US military's presence runs deeply on human, environmental, and moral levels. The army is the lessee of Hawai'ian lands, not the decision-maker. Yet, we submit our comments to the US Army, as though they are entitled to make decisions about Indigenous lands upon which they are the colonizer -- under the guise of an EIS process, which is obviously performative. The US military is the largest emitter of greenhouse gases and controls nearly a quarter of land on O'ahu. These injustices compound generations of colonization, just one aspect of the larger injustice of the US military's occupation and degradation of Kanaka Maoli land. There should be no "retention" of this land for the US Army; the military should never have been in control of it in the first place. I am an Indigenous Okinawan whose ancestors and kin are also subject to the violence of the US military. I join Kanaka Maoli and Indigenous peoples in Hawai'i and everywhere else, who demand land back for Kanaka and a demilitarized Hawai'i.
Bean YogiZip code: XXXXX

Jess Young

The United States government owes Hawai'i and its people rematriation of the stolen land that the US military occupies and reparations to the people from here. We have witnessed the pollution and destruction that the US military causes to our land, water, and wild life. There is no time soon enough for native self determination and stewardship of the land.

We demand that this lease is not renewed and that the wellbeing and autonomy of Hawaiians and Hawaiian land is prioritized and respected.

Karen GS Young

Aloha, Please add my written testimony to the Public Scoping process in your EIS re renewing the lease for Makua Valley on Oahu. Mahalo, Karen GS Young

August 21, 2021

Karen GS Young
XX-XXXX XXXX St.
Wai'anae, HI XXXXX
Cell : XXX XXX XXXX

Re: US Army Environmental Impact Statement with Goal to Renew Leases

SINCE BEFORE WWII, the military has used Makua Valley for it's bombing, missile, and other airstrike practices, as well as ground military live fire practices.
It had also been used to open burn various toxic chemicals, hospital waste, and weaponry waste: there is apparently no detailed records.
During these many decades, the effects of these activities on the Environment and the People of the Westside was not monitored or even considered.

Also during these years many military vehicles with various heavy weaponry and and soldiers passed through the streets of Nanakuli, Wai'anae, and along the Westside, on their way to Makua. Various military helicopters and military airplanes also flew over. This made the Wai'anae Coast a military target.

The take over of these lands (650 acres) was via a 65 yr lease for $1, to the State of Hawai'i.

The gall of it ! The belittling of precious land in Hawai'i!
The disregard of the people who were living in Makua Valley.
The families living in Makua Valley were booted out,
perhaps paid a token sum, and in some cases made to leave by the military destroying the precious wells that sustained them.

Approximately 17 yrs ago, MALAMA MAKUA through the legal work of EARTHJUSTICE, successfully sued the US ARMY to stop live fire training in Makua Valley, until an acceptable EIS was completed. During this time, there's been NO LIVE FIRE TRAINING IN MAKUA. That kind of training has been moved to another site. Soldiers have been successfully trained somewhere else for 17 - soon to be 18 years! That is, the Military did not need Makua, to train them!

Makua Valley includes the adjacent valleys: Kahanahaiki, and
Ko'iahi: together presenting a spectacularly majestic view as one drives to the end of the road - Ka'ena Pt

This is not the only beautiful land on the Westside the military has confiscated and exploited. There is also the military tracking station above Ka'ena Point, the vast lands of Lualualei Naval Reserve and the Army Restcamp. There may be others not

so well known.

NOW, we have another affront to the community: a movement to renew the lease !

This community has waited 65 yrs for the lease to end ! The repeated refrain to the Army Representative at Neighborhood Board Mtgs is: " When is the Army going to leave??!"

In this time of warring countries, political upheavals, the Pandemic Surge, the thousands of migrants espcaping intolerable and unlivable situations in their home countries and the frequent natural disasters brought on by Climate Change : we are going to practice more hand to hand killings and practice bombing to kill people more effectively??

NO, NO! NOT EVER, should the lease be renewed to the US Military!
Instead, the Army should do its HONORABLE DUTY: **Clean up the valley of UXOs** and Leave the valley, let it rest, let it become a place to now Experience and Teach Peace.

Hopefully and Respectfully,

Karen Young
Community Resident

Kristen Young

Aloha, my name is Kristen and I am a resident of Makiki, born and raised on O'ahu. I am strongly OPPOSED to the extension of military leases on the lands of Mākua, Kahuku, and Wahiawā. Extending these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals, and continue to disrupt the lives of the local community. The Army has wrongfully leased these lands from the state for just $1 for over 50 years.

Growing up in Hawai'i, we learn the concept of mālama 'āina—to care for the land so the land can care for us. The leasing of these lands to be used for warfare harms our environment and in turn the people of the land. When the leases expire in 2029, this land should be immediately restored to the public.

Mahalo for your consideration.

Kristen Young

I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... not only does the leasing of these lands NOT benefit the Hawaiian people, the people of the land; the use of these lands for military purposes also actively harms the land and contributes to destruction and desecration. For too long, Hawai‘i has been taken advantage of, the people and land disrespected and disregarded to prioritize profit and power for a select few. I hope that those with authority might choose to value life, the land and its people, above all else. Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state's constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The "highest and best use" of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good.

These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts.

The EIS process currently considers a "no action alternative" as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored.

Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the "fair treatment of all people". Fair treatment means "no group of people should bear a disproportionate share of the negative environmental consequences". The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world.

These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality

acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. In 1997, the CEQ produced a guide titled "Considering Cumulative Effects Under the National Environmental Policy Act" which provides a framework for advancing environmental impact analysis by addressing cumulative effects in either an environmental assessment (EA) or an environmental impact statement. The EIS should employ this framework in order to address the cumulative effects of all related military activities, not just the proposed project.

US militarism has affected not only Kānaka Maoli, but other diverse communities of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities.

These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai‘anae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities.

Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Wai‘anae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands.

In the Ching vs. Case ruling, the court found the state to have a trust duty to "mālama ‘āina" and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using.

These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through mo‘olelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS

should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access.

Environmental justice (EJ) as defined by the EPA requires “meaningful involvement” of impacted communities such that “decision makers will seek out and facilitate the involvement of those potentially affected.” Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Waiʻanae, Wahiawā, or Kahuku.

I was born and raised on Oʻahu and I am not Native Hawaiian, but anyone who loves Hawaiʻi must not support its misuse. The best thing the Army can do to protect Hawaiʻi is to de-occupy the lands and return them to Native Hawaiian stewardship.

Lille Youngbauer

The U.S illegally invaded Hawaii 123 years ago and continues to colonize Hawaii for military profit with the use of military leases despite protests from both native Hawaiians and other millions of supporters across multiple states.
Return and restore all land to the people of Hawaii. Redistribution of both industrial and private non native land occupation, as well as any necessary funding for adjustment.
Nothing less is adequate.
Oregon Resident

Nathan Yuen

Okay. So I just want to -- my name is Nate Yuen. I'm a lifelong resident of Oahu.
And I just want to say that in her presentation, the speaker made continual reference to state-owned land. And that is problematic from a number of perspectives. So I don't think that the state of Hawai'i should be leasing these lands. I mean, it's not even the state of Hawai'i's land.
So I just want to say that there are many things that are wrong with the process. The military has not been a good support of the land. All the toxins -- the depleted uranium at Pohakuloa on the Big Island, and also in Makua Valley, the spent uranium rounds -- are having serious impacts on the water.
So, you know, the military is supposed to be cleaning this up. But it is not. I don't think it ever really intends to. It just intends to use the land to advance the interests of American empire and American corporatism. There's no really benefit to the people of Hawai'i. And these lands are crown lands, are some of our ceded lands that are supposed to be used for the benefit of the public.
So I'd say this process has been quite problematic. But it's actually a good thing that we're going through it, yes, because we do -- we do get to -- get a chance to challenge the assumptions that are behind this process. So thank you for allowing us to comment. Mahalo.

Luis Zano

Stop colonizing Hawai'i! Leave the land and give it back to the Hawaiians.

Anne Zellinger

AGAINST U.S Military Lease renewal for Poamoho, Kahuku, Makua, and Pohakuloa

I live on the North Shore of Oahu under the flight path and next to Kamehameha Highway which is used as a military corridor during manuvers/exercises. This district is residential and the impact from increased traffic congestion, noise levels, and the potential risks of flight accidents is not warranted. Military missions are being re-evaluated as we wind down the US military involvement in world diplomacy. I think we in Hawaii should reassess the health and welfare of our community and aina vs the destruction caused by these maneuvers.

I am against renewing this lease.

Alexandra Zermeno

It’s far too long we’ve let y’all take over things that are not yours!!! Shame on y’all Do better We just have to do better
Sent from my iPhone

Shuochen Zheng

Continued use of explosives not only degrade soil quality and contribute to build up of heavy metals, it also increases soil erosion (via water and wind) and decreases water quality makai in the ocean. An example would be all the bare dirt and invasive grasses at Makua Valley, all of which contribute to fire risks. The use of explosives prevents native plant species from establishing as they're unable to compete with invasive species without conservation efforts to do invasive species removal. Training areas should be reduced and conservation areas for ecological rehabilitation areas should be enlarged. What was once fertile land that could have continued to provide an abundance of food for Native Hawaiians is now unable to support sustainable local agriculture. There should be consideration of reparations to local Native Hawaiian communities as well as strategies to ameliorate ecosystem destruction and soil degradation.

Aipohaku

Tonight I lift the voicesof my kupuna, whose signatures on the Ku'e Petitionreminds me every day that my country is Hawai'i, andwe have been under an illegal occupation since 1893. The U.S. military is unfamiliar of whatconsent is and why it is important on a collectiveand individual level. I am testifying tonight inopposition of the extended military leases ofHawaiian lands. It is 100 percent not okay for themilitary to be desecrating any of the land theytrain on. But to think their impact does not extendbeyond training grounds are issues I am demandingfor the U.S. military to hold themselves accountableto and for while conducting their EIS. One, the U.S. military does not and hasnever had our consent to be here. Two, the militarycost of living allowance and other benefits areburdens forced upon the shoulders of Native Hawaiians and non-Native Hawaiian residents.Three, the psychological war tactics taught to U.S. soldiers is a threat to NativeHawaiian communities; therefore, military personnelare causing violence in non-military environments. Four, as the military presence expanded inour islands, human sex trafficking has skyrocketedhere in Hawai'i and across the world. These four points that I mentioned is onlythe tip of the iceberg. The U.S. military is nothere to protect us. In closing, I would like to share thewords of Auntie Max. Pack your ukana, which are yourbelongings, your opala, all the trash you created,go home, and don't ever come back. Under this alternative, the Army will packtheir **** up and return to stolen land back to theHawaiian Kingdom, the sovereign nation of Ko Hawai'iPae 'Aina. Mahalo.

Audrey

"Aloha. My name is Audrey, and I'm a resident of Makiki. I'm strongly opposed to the extension of military leases on the lands of Kahuku, Makua, and Wahiawa. An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals, and continually disrupt the lives of local community. The army has wrongfully leased the land from the state for $1 since 1964. When the lease is expire 2029 this man should be immediately restored to the public. Mahalo "

Branson

My name is Branson [unintelligible]. I'm a kamaaina of the ahupuaa of Heeia and a kanaka maoli. I would like to say that, you know, I'm very kind of frustrated because the alternative that I would like is not even available as a choice that was displayed through the presentation. On that the military has done and that alternative that I would prefer is rather than retainment is return of these lines to the proper land owners, which are the Hawaiian Kingdom, the crown and kuleana land owners and all the titles when it comes to these lands and the legalities I want to state that when it comes to the environmental issues, how this relates to the EIS, the social and other impacts upon Kanaka maoli are very much intertwined with our environment because in our worldview, we are of one ha, of one wai, and we are of I. we are Hawai'i too. So the impacts that affects our aina directly impact us as well. So when it comes to the legal issues that everybody's talking about regarding land ownership, you know, the illegality started with the illegal participation in usurping our monarchy under orders from Minister... who landed United States Marines here. This act will be known as an act of war by President Grover Cleveland now five years later after the overthrow of This fighting over 90% of our population of post the annexation. The United States Congress public passed a joint resolution called the new lens resolution. It's a joint resolution, not a treaty, it did not go to the two thirds process on voting ratification process in the Senate. So it's not even legal in your own constitutional laws and even in case law and it comes to join resolutions and action territories. Two parties need to come to an agreement. The republic of Hawaii was not the legal authority to convey it to the United States. So, even then it's not speculated, it's factually, you don't really own the land and you can see the whole value has not authority to lease them. Now, continuing on into further description about this illegality, on after World War Two the United States put Hawaii under the United Nations list of non-self governing territories up for decolonization and the decolonization act. However, in 1959 the United States to justify illegal occupation past resolution 1469 which is in reference to a referendum which never happened through the statehood act. This referendum, you know, going now to 1993 to show that it was never it never occurred and President Bill Clinton signed Public Law 103-115 known as the apology resolution. Where it states in one of its whereas clauses, whereas the indigenous Hawaiian people never directly relinquish their claims to their inherent sovereignty as a people are over there national lands. To the United States visit their monarchy, or through a plebiscite or referendum, thus admitting there's no referendum, even though I know people speculate on the apology resolution. And even if it did have a referendum, there was a quote sacred trust unquote involved in the United Nations Charter chapter 51 article 73E. So, you know, there's layers upon layers of illegalities, which are still being addressed today, by the way. When we look at just as recent as three years ago when the United Nations Office of the High Commissioner publish them or a memorandum in 2018 On the legal expert Dr. Alfred Murray's disasters investigation, where it states that it comes to the Hawaiian kingdoms political status. It's a quote on a sovereign nation state in continuity and quote meaning where we're legally The legal authority over these lands. So when it comes to these illegalities, you know, it's time for the military and all other arm branches. To address this issue of illegalities of land ownership until those things are addressed. There shouldn't be a motion, a move to retain these lines because they're not their your land to retain, theyre furthering war crimes. There's no amount of money. I know people are talking about the dollar leases, but there's no amount of money that can further justify that illegal occupation of our land. These lands need to be returned. That's the bottom line. So it's very telling that the United States using the armed forces as Pirates of the Pacific. Are trying to strengthen their grip on our

island as further legal issues are happening in the international community has more attempt to investigate what's happening here in Hawaii. So with that being said, I would request that these lands be returned rather than retain to their proper land owners, which is the Hawaiian kingdom. Kingdom law supersedes that of American law when it comes to the international realm and international law of how politics works here in Hawaii. "

Brianna

"Aloha. My name is Brianna, and I'm a resident of O'ahu. I'm strongly opposed to the extension of military leases on the lands of Makua, Kahuku, and Wahiawa. An extension of these leases will allow the military to further damage the natural resource to these areas. Destroying the natural habitat of Native Hawaiian plants and animals and continually disrupt the lives of local community. The army has wrongfully leased these land from state for $1 since 1964. When the lease expires in 2029 this land should be immediately restored to the public. Mahalo Nui loa. "

Daniel

Aloha, my name is daniel and i am resident of florida. I am strongly opposed to the extension of military leases on the lands of mákua, kahuku, wahiawā. An extension of these leases will allow to further damage the natural resources of this areas, destroy the natural habitats of native Hawaiian plants and animals, and continually disrupt lives of the local community.

Diana

"Aloha. My name is Diana and I am the resident of California. I strongly opposed. I am strongly opposed to the extension of military leases on the lands of Makua, Kahuku, and Wahiawa. An extension of these leases will allow the military to further damage and natural resources of these areas, destroy the natural habitat of native Hawaiian plants and animals and continually disrupt the lives of the local community specifically, Kanaka maoli, Native Hawaiians. The army has wrongfully least these lands from the state for $1 since 1964. When, the lease expires in 2029 this land should be immediately restored to the public, we must end US imperialism since Hawaii isnt even part of the US it was wrongfully overthrown and the Kingdom of Hawaii was overthrown and their entire culture was impacted. I am strongly opposed to the the extension of these leases and I'm calling on the end of all US imperialism, especially in Hawaii. Thank you. "

Gabriel

"Aloha. My name is Gabriel jus soli I am a resident of XXXX Honolulu, Hawaii. I am strongly opposed to the extension of the military bases on the lands of Makua, Kahuku, and Wahiawa. An extension of these lands will allow the military to further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals and continually destruct the lives of the local community. The army, the US Army has wrong to release these lands from the state from for $1 since 1964. When the lease is expiring This land should be immediately restored to the public. Thank you. "

Giovanna

Aloha. My name is Giovanna and I'm a resident of Provo, Utah. I'm strongly opposed to the extension of military bases on the lands and Makua, Kahuku, and Wahiawa. An extension of these leases will allow the military to further damage the natural resources of these areas. Destroys natural habitat so native Hawaiian plants and animals can continually disrupt allies with a local community. The army has wrong please these lands from the state for $1 since 1964. When the leases expire in 2029 this land should be immediately restored to the public. Mahalo

Hanalei

Aloha, please let me introduce myself. My name is Hanalei [unintelligible]. I represent AHA moku advisory council. AMAC. Several years ago I Actually asked military to do a clean up on the USOs. And then the army actually only did about two thirds of it and actually lacking transparency, there's another third I believe that they need to be cleaned up. And this only talking about the makai the ocean side of Farrington highway and yet also that the mauka side the mountain side is actually still littered with USOs. So, you know, so even military wants to lease the place again, So again, I mean, they need to clean it up and actually it's been a say over 80 years since Army has occupied Makua. I'm actually challenging that. Because I think it's time to move on and also the, the technology is a lot better than, than it was back then. So I don't think place would be useful for military Training anymore and I oppose that. I oppose having the military there again. So we're looking at the families going home families are displaced. In fact, right now, beachside this flocking flocking with tourists, stuff like that. So a lot of people right now in harm's way. And I think about the safety I'm concerned about people's health and safety because you know depleted uranium, all kinds of things like that. And then the army never really finished the job cleaning everything up. So why should we want to extend it again when they still have a lot of work to do. So I'm in a position of having Makua and also Wahiawa a few Schofield so. Yeah definitely would oppose it, and suggested military actually move on and not looking at renewing the lease. So actually, yes, find someplace else to do military training because it's really actually at this point. Obsolete. So this, this my stomping on it. So thank you very much. Aloha. "

Heather

"Hi, my name is Heather and I'm a resident of California, although I do not live in Hawaii. I do have family there. And so I'm very invested in this cause I'm strongly opposed to the extension of military says on the lands of Makua, Kahuku, and Wahiawa. What an extension of these leases allow the military to further damage and natural resources of this area destroy the natural habitats native Hawaiian plants and animals and continually disrupt the lives of the local community. The Army's wrongfully received from the state for one dollars in 1964 when the lease expires and 2029 this land up immediately restored to the public. Thank you. "

Holly

"Aloha. My name is Holly and I'm a resident of California, but I'm strongly opposed the extension of military leases on the lands of Makua, Kahuku, and Wahiawa. An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitat of Native Hawaiian plants and animals and continually disrupt the lives of the local community. The army is wrongfully leased these lands and when the lease expires in 2029 this land should be immediately restored to the public. Thank you, and I hope you all do the right thing. "

Ilona

"Hello. My name is Ilona and I'm a resident of New Jersey. I'm strongly opposed to the extension of military leases on the lands of Makua, Kahuku, Wahiawa. An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals and continue to disrupt the lives of the local community. The army has wrongfully least these lands from the state for $1 since 1964. When the lease expires in 2029 this land should be immediately restored to the public. "

Isabel

"Aloha. My name is Isabel, and I'm a resident of Wahiawa. I am strongly opposed to the extension of military bases on the lands of Makua, Kahuku, and Wahiawa. As an extension of these leases, it will allow the military to damage the natural resources of these areas and destroy the natural habitat for Hawaiian Plants. And the lives of our local community. The army as wrongfully at leased these lands from the state for $1 since 1964. When the lease is expiring 2029 I believe that this one should be restored to the public and the native Hawaiians. Thank you for your time. "

Jerry

"Aloha. My name is Jerry. I'm a resident of Oahu am strongly opposed to the extension of military leases on the lands of Makua, Kahuku, and Wahiawa. An extension of these leases will allow the military to further damage your natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals and continually disrupt the lives of the local community. The Army has the army has wrongfully leased these lands from the state for $1 since 1964. When the lease is expiring 2029 this land should be immediately restored to the public. Mahalo "

Jim

Yes. I'm calling in from the Big Island, from Ola'a area. And our main focus, of course, is Pohakuloa here, but I wanted to express solidarity with all the folks that testified, eloquent testimony this evening about no military lease extensions. And stand in solidarity with Hawaiian lands going back to Hawaiian hands. And stop the killing of our 'aina. I just want to make one point here. Our organization, Malu 'Aina, has documented 57 present and former military sites on Hawai'i island alone, totaling more than 250,000 acres that are in need of military cleanup. The estimated cleanup cost is in the billions or tens of billions of dollars. And I am the co-author of the book, "The Dark Side of Paradise", about the military presence in Hawai'i. And it documents many of the impacts of life under the gun of U.S. militarism throughout Hawai'i. The one point I want to emphasize is -- of one of those 57 sites on Hawai'i island is in the Aloha Forest, not very far from where I live. It had an organic farm for over 40 years. It's on the Stainback Highway. And the forest is the watershed for Hilo. And in the 1960s, the Army got a lease of state land in that forest area to do what they told the state was weather testing. Well, they lied. They tested chemical biological weapons in the Hilo watershed, one including sarin nerve gas. One-fiftieth of a drop kills you. Hunters in the area say that there are still areas in that forest where nothing grows today, more than 60, 70 years later. So that's the horrors of militarism. Thanks to Patsy Mink, the congresswoman who exposed that lie of military chemical biological weapons, the mayor at the time -- Shunichi Kimura -- spoke up and said cancel the lease; the military lied to us. And everybody pushed back, and the military lease was canceled. And we need the same today. And tonight's testimony has been in that direction. No more lease extensions. It's time for cleanup, not further military buildup. Thank you.

Leila

Aloha my name is Leila and I am a resident of Hawaii. I am strongly opposed to the extension of military leases on the lands of Mākua, Kahuku, Wahiawā. An extension of these leases will allow the military to further damage the natural resources of these areas, destroy the natural habitat of native Hawaiian plants and animals, and continually distrust the lives of the local community. The army has wrongfully leased these lands from the state for $1 since 1964. When the leases expire in 2029, this land be immediately restored to the public.

Kalani

"Aloha. My name is Kalani and I live on Oahu. I am strongly opposed to the extension of military leases on the land of Makua, Kahuku, and Wahiawa. My people have suffered enough. If you care about the aina, native plants and animals then you will take the time to hear our concerns. Mahalo"

Katie

"Hello, my name is Katie [unintelligible] and I am strongly opposed to the extension of military leases on the land of Makua, Kahuku. As an extension of the leases will allow the military to further damage the natural resources that area and destroy the natural habitat of Native Hawaiian plants and animals. And continually disrupt the lives of our local community. Look at the army has wrongfully receive love from the stage for $1 since 1964. When the lease expired and lease expires in 2029 the land should be immediately restored to the public. Thank you so, so much for your time. I hope you Listen to the people who oppose the military leases on this land. Thank you so much for your time. "

Kennedy

Hello, my name is Kennedy and I'm a resident of the Big Island. I wanted to call and say I'm very, very opposed to the extension and military leases. And the reason I'm opposed is because I'm concerned about the natural habitat and biodiversity of the plans and also the effect it has on Native Hawaiian culture by destroying these places. And not to mention also that the leasing of these lands is wrong in the first place, so absolution should be extended. Okay, thank you.

Koutaro

I can speak louder. Aloha kakou. My name is Koutaro, international graduate student at U.H. Hilo. I am from the illegally occupied island of Okinawa, so as a Native Okinawan, I know that the military doesn't protect the people. They only want the land as territory. In my island, drinking water is contaminated. One of the most beautiful oceans in the world, Henoko, is now being landfilled for a new U.S. Marine base. And many U.S. soldiers commit a lot of crime and get away from being arrested, and many more destructive impacts on us. So I know how kanaka maoli feel about their land being taken away. So, please, before you talk military merit or just to take it, please respect and listen to native people's voice. So as a native of Okinawa, I'm oppose to this renewal of land lease. Mahalo and aloha.

Ku'uleikuponookealoha

"Aloha. My name is Ku'uleikuponookealoha I'm a medical professional practices in Wahiawa. I am concerned for the ongoing leases to the military on the island of Oahu and other islands for not only the environmental impact, but the cultural impact it has on the hawaiian people. Wahiawa is the piko of the island, yet many of the Hawaiians struggle with health, fitness, food insecurity. And desecration to the environment has a generational impact. So I would like to see the lands returned to the Hawaiians, so that we can restore and regenerate our land so that we can share for our people. Mahalo "

Rachel

"Aloha. My name is Rachel and resident of the state of California and I am, I‘m calling because I‘m strongly opposed to the extension of military leases on the lands of Makua, Kahuku, and Wahiawa. An extension of these leases will allow the military to further damage the natural resources of these areas and destroy Natural Habitats of native Hawaiian plants and animals, continuing to disrupt the livelihood of the local community. The army has wrongfully least these lands from the state for just one dollar in 1964. When the lease expires in 2029 this land should be immediately restored to the public and Native Hawaiians. mahalo "

Ronnie

Aloha. My name is Ronnie and I'm from the resident of ... And And I am strongly opposed to this tension of the military lease on the lands of the Makua ... You all just need to stop. Like, really, why are you all bombing these things that need help. You really do. Because I don't understand why you want, why you all bomb this stuff. You killing things, you messing up the land. Just because you want to bomb stuff. So you want to go somewhere else with that. That would be very much appreciated. Thank you so much.

Senti

Aloha. My name is Senti, and I'm a resident of the mainland--in what is now called Portland--and strongly opposed the extension of military leases on the lands of Makua, Kahuku, and Wahiawa--sorry, my mispronunciation. I am a settler of these lands and I am not a native Hawaiian. An exclusion of these leases will have military to further damage the natural resources of these areas, destroy the natural habitats of Native Hawaiian plants and animals. And continually destruct the lives of the local community, many of which are houseless because they cannot afford to live in their own land, due to the United States intervention and continuous tourism and mainlanders moving to the islands. The Army has wrongfully leased these land from the state from the state for $1 since 1964. When the leases expire in 2029, this land should be immediately restored to the public. This shouldn't even be an issue that we're discussing. The Native Hawaiians are put into the street and told you, and they're water is shut off so the people like me white settlers can have a pleasant time on land that were never mine never will be mine. I just want you to look into your heart and look into your better judgment. This is not about money. This is not about what the military can get from this as a human being. This is the only Earth we have and islands are even more vulnerable to Environmental degradation, because there's nowhere for anything else to go. The animals on the islands have only one place to be the humans have only one place to be, humans are animals anyway. The degradation of that land is detrimental to our earth. Please.

Shanny

Aloha. Yes, my name is Shanny, and I'm a resident of Keaau on the Big Island. I'm calling because I'm strongly opposed to the extension of military leases on the land of Makua, Kahuku, and Wahiawa. An extension of these leases will allow the military to further damage the natural resources of these areas, destroying natural habitats of Native Hawaiian plants and animals and continuously disrupt the lives of the local community. It is to my understanding that the army has wrongfully leased land from the illegal state of Hawaii for $1 since 1964 and when these lands expire the lease, these leases expire in 2029, this land should immediately be restored to the public and then Native Hawaiians, thank you.

Tawna

"I oppose the renewal or re-leasing of any lands at Mākua, Kahuku, and Poamoho because... The land belongs to Hawaii and the Hawaiian people. Return it to them.

Tyler

Aloha. My name is Tyler. I'm a resident of Honolulu. I am strongly opposed to the extension of military leases on the land of Makua, Kahuku, and Wahiawa. An extension of these leases will be will allow military to further damage natural resources of these areas, destroy the natural habitats needed for and plants and animals into your story disrupt the lies that local community. Obviously, you've heard this script before the things that I would like to point out are that there are an inefficient amount of public access trails. That are not as well maintained as they could be to help support the native Hawaiian ecosystem of plants and animals. The lands of Makua, Kahuku, and Wahiawa are vast and hold a large amount of biodiversity and I as a resident of the state and as a citizen of the world that is slowly crumbling all around us in terms of biodiversity would love to see those lands be protected. So that this wonderful place can be enjoyed for generations to come. And not just be simply used as a place for military training exercises when there are already plenty of other military training options around the island. I believe also in fact that it's being purchased for $1 when it could possibly bring in billions millions of dollars for tourism, ecotourism, sustainability of those resources for the suitable future of Our human existence would be way more impactful than I think 50 years of military training which can be done in numerous other places. Thank you for your consideration. I really do appreciate it. Thank you guys for setting this up. I do really appreciate the opportunity to have my voice be heard and we hope that these views are considered with the weight in which I believe that they are spoken. And thank you. Mahalo

Unidentified Caller #1

"I just wanted to call to say that the US military lease extensions on Hawaiian public land should be stopped. Thank you. "

Unidentified Caller #2

"Aloha. My name is [unintelligible]. I strongly oppose the leasing of land to the military for war game practices and whatever they need that land for. It does damage to our environment. So I would like you to please, please. My concern is an endangered plants and Native Hawaiian birds and insects and everything that they impact or just the land itself of how their heavy equipment, their ammunition, whatever they do it there. We hear you know whatever they do we know that It's detrimental to the land and the environment and they say that they need to do this to protect us. But who is protecting us from them and the things that they do to the land? on the only reason why you have a fight is because you You upset somebody so there's no reason to to have a war if no one has had, you know, is causing the fight. So I promote peace and so I really feel that having the military presence causes more harm than any good and just the negative impact that their military practices on has on the environment, it's detrimental to the land and to the future. Thank you for allowing me to share my comments. "

Unidentified Caller #3

"I oppose the extension of the leases in Makua, Wahiawa, and Kahuku. The military should not have their leases extended. Enough already. You guys are doing enough damage. Thank you. "

Unidentified Caller #4

"Aloha. So I just wanted to share that I do not support the leasing of Hawaiian Native Hawaiian lands for $1 I appreciate so much Everything that the military does it have family members that were in the military family members that are still in the military, and I appreciate everything that the military does For us Native Hawaiians, and for people that live on the island of Oahu and all of the islands, the Hawaiian chain. I appreciate it a lot, but I do not support. The military leasing Hawaiian Islands for $1 a year, so like that is extremely ridiculous, especially because of the displacement of Hawaiians. And the fact that we are trying so hard just to survive. Not even just aligned, but people trying to survive on the island of Oahu and several other islands, I do not support this and what I hope Is that the leasing stops. I do not support it at all. I do appreciate everything that the military does. Hawaiian, Native Hawaiians, especially Our displeased, even at the beaches everywhere along the island. All you see is military and the fact that military is able to lease native lands and to destroy the native lands is just ridiculous and I do not support it at all. And I just wanted to voice that. Mahalo again so much for listening to what I have to say, and for allowing me to voice my opinion. But I just wanted to ku‘e and stand against this and let you guys know that I do not support this, that I as a native Hawaiian do not support this mahalo "

Unidentified Caller #5

"Aloha. My name is [unintelligible] and I'm currently a resident of Manoa, O‘ahu and a recent graduate of the University of Hawaii at Manoa. I‘m speaking today in solidarity with kanaka maoli against the extension and military bases on the lands of Makua, Kahuku, and Wahiawa. This illegal annexation of Hawaiian land is an act of violence. Policing of stolen Hawaiian land is an act of violence. The utilization of these lands to train people to murder is an act of violence. Filing billions of taxpayer dollars to kill civilians in Iraq, Afghanistan, Palestine, Syria and more ravaged the homes and lives of billions of people is an act of violence. The US military industrial complexes and violence institutions. Growing up in Southeast Asia. I witness how us capital of hegemony has and continues to control the global order. After moving to Hawaii quickly learned that the military is one of the most powerful institutions in the world, is a tool that you use to perpetuate patriarchal white supremacist violence. I learned that have what you value through the lens of extended ability to have people going to come all the proceeds unexploited a puppet and what the Pentagon calls the quote unquote center of indo-pacific fear. I learned the US military is apathetic towards kanaka maoli, Micronesians, Marshallese, and all other Pacifica and black communities being devastated and dispossessed. I learned that the United States as an imperial core functions to uphold the marginalization of black indigenous communities and people of color across the world. Especially in the global south or using national security at the past time excuse. We see this with Kahoolawe, Pohakuloa, Bikini atoll, and the Red Hill underground storage tanks right here on Oahu just to name a few of the countless examples. We do not in a crash course to see Hawaii and its people are designated as sacrifices. The army is wrongfully leased these lands from the fake state of Hawaii for $1 since 1964. Starting now and leading up to 2029 these lands should be needing to be cleaned up, restored, and returned to kanaka maoli. Then military must pay reparations to the communities, upon which they have caused destruction and intergenerational trauma. No further evaluation is needed. Mahalo for an opportunity to justify.

Unidentified Caller #6

"Aloha. I believe the army is helpful in a way but I don't believe in fighting is a way to resolve issues, perhaps, if the land was used to teach military to plant seeds and plant crops, then they can pass it on to their enemies into establishing more green food. Green as in shady because of our planet being over heating. So, If it can be used the land in non fighting military use of weapon, then I would strongly disapprove. But if they can be used for showing military garden in farming techniques to offset global warming and help other countries survive in a better way than combat with by force, then I would say yes, let's have the military use the land along with Hawaiians to or other civilians to grow food and crops, rather than to keep on destroying land with weapons. So that's why I disagree upon how the military uses the land. Currently, if they would change their policies to construct a positive way to make Hawaii or even the world a better place. I would say yes, allow a military to use the land for better. Thank you. You understand there's two sides of a story. We do need military in a way. And we end, but we don't need to show how to destroy, we should learn how to build and protect the land. Thank you very much. Okay, bye bye "

Unidentified Caller #7

"Hello, my name is....and I am a kanaka maoli whose ancestors have inhabited these islands for generations back to pre-contact times. Today I'm calling to voice my opposition to the extension of military leases in Makua, Kahuku, and Wahiawa. There are too many houseless Hawaiians who are also forced to depend greatly on imported goods and this land should be used to provide for Hawaiis people. Mahalo"

Unidentified Caller #8

"My name is [unintelligible]. I do live in the United States, the mainland. I have friends in Hawaii. And I am strongly opposed to your military extension of The lands on Makua, Kahuku. You make sense when you do these things. I mean, The military part is ridiculous, in and of itself. Your message, even in your voicemail is ridiculous. You do not a property of these lands. You damaged, these lands. What you're doing isn't right. Thanks. "

Unidentified Caller #9

"Yeah, I'm I am calling in response to this EIS. We want the military out of Hawaii. We think that $1 for all the land 25-26% of the land in Hawaii, that has been militarized, we want that back. We do not want destructive practices with bombs and guns In our communities and on our aina, and we do not like the toxins as well that the military has left behind. Pohakuloa, Makua, Schofield All of these places on Oahu and the Big Island is every other place that the military occupies is poisoned. We do not want this militarized station and war mongering here in Hawaii, we want the military to leave. Bye.

Unidentified Caller #10

"Hello, I'm in opposition of extended leases with the military for the areas of Kahuku, Makua, and Wahiawa. And also in regards to that EIS statement, unless you have cultural practitioners that can assist archaeologists in the sacredness of these areas, then I believe that your EIS, it may not be of great work and may not satisfy the community and the people of Hawaii. Thank you. "

Unidentified Caller #11

"So I know you know this already, but my concerns are that the US military has no legal right to be in Hawaii at all, let alone leasing property from an entity it installed in Hawaii without the people avoid being able to be proactive. And you should be aware of that. And you know that you are you, I'm guessing that you are, but so there should be no more leases to the military because all the military does here in Hawaii is unload ordinance and not clean it up. Why? They say they are going to clean it up and then don't. Well, that's my experience with the Navy. The Army can't be far behind. There's a lot of mess to clean up and I don't see them doing any of it. And the other members of the military or the armed forces all out there. What are they doing? Well, they‘re training, they're not cleaning, they‘re training and I get it, you need to train, but you also need to clean up after yourself like grown ups. And, So, no more, no more leasing Hawaiian lands. We have very little of it left. Stop."

Unidentified Caller #12

Aloha. I am a native Hawaiian And I'm in opposition of the renewal of any leases. Which result to the desecration of our land. Kealoha ‘aina.

Unidentified Caller #13

[Translated from Hawaiian to English: "Want to lease our birth lands (sands), our rich/valuable lands where our pua liko grows. In my understanding there are lease documents from a long time ago.

Unbelievable, you paid only a dollar a year (or- only a dollar a year was paid for these lands). You think it's funny, maybe, but in my opinion, this is real theft indeed. Pualikoa was taken, the rich/valuable place of our men, of our people.

Here is the truth indeed. We don't have or want your money for our birth lands. Therefore, I stand up against the leasing again of our land, that you get it again. Makua, Kahuku, Wahiawa Pohakuloa. Return our lands at Makua, Kahuku, Wahiawa and Pohakuloa. And return all our ancestral lands. Thank you"]

Anonymous

Much of this huge expanse of 6,300 acres of land are former Crown and Government Lands of the Kingdom of Hawai‘i, which were seized following the illegal overthrow and subsequent illegal occupation. These lands are currently held in trust for Native Hawaiians and the general public. Under the state constitution, the State of Hawai‘i has an affirmative fiduciary duty to ensure that use of public trust lands serves trust beneficiaries. Hawai‘i courts have also acknowledged the state’s constitutional duty to mālama ‘āina. The leasing of ‘āina for $1 a parcel for 65 years is a potential breach of these duties, as is any additional lease. The exploitation of land for warmaking harms trust beneficiaries while foreclosing potential alternatives that better serve public good. We need ‘āina for agriculture, housing, hunting, cultural practice, wellbeing, open space, and conservation. The “highest and best use” of these lands is not military retention, but instead includes these alternative uses that offer greater benefit to the public good. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. As such, the EIS should analyze the cumulative effects of these leases in the context of past, present, and reasonably foreseeable future actions, and in relation to the accumulation or synergistic interaction of other military impacts. The EIS process currently considers a “no action alternative” as a baseline against which to compare other preferred alternatives. However, the Army must thoroughly consider this alternative and address the positive social, health, and cultural benefits of returning and restoring land. For example, since the suspension of live-fire training at Mākua Military Reservation, Mālama Mākua has created transformational opportunities for cultural access, education, and healing for many people in Wai‘anae and the broader community. The EIS should include a comprehensive analysis of the benefits that would accrue to Native Hawaiians and the general public if these lands were returned and properly restored. Retention of these lands for military training exercises reproduces collective psychological and intergenerational trauma that disproportionately harm Kānaka Maoli by further alienating Native Hawaiians from ‘āina. Additionally, the long-term leasing of Hawaiian lands to the occupying military creates a sense of entitlement that further constrains Hawaiian sovereignty and self-determination. Environmental justice (EJ) as defined by the EPA requires the “fair treatment of all people”. Fair treatment means “no group of people should bear a disproportionate share of the negative environmental consequences”. The EIS must address the disparate impacts that these leases will have on Native Hawaiians as a result of their genealogical and familial relationship to ‘āina, the ongoing suppression of their sovereignty at the hands of the United States, and the use of ancestral lands for military aggression around the world. These three leases are part of a much broader network of military occupation. The US military controls nearly a quarter of all land on O‘ahu. The Council on Environmental Quality acknowledges that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. In 1997, the CEQ produced a guide titled “Considering Cumulative Effects Under the National Environmental Policy Act” which provides a framework for advancing environmental impact analysis by addressing cumulative effects in either an environmental assessment (EA) or an environmental impact statement. The EIS should employ this framework in order to address the cumulative effects of all related military activities, not just the proposed project. US militarism has affected not only Kānaka Maoli, but other diverse communities

of Hawai‘i: US intervention in the Philippines; the nuclear bombings of Japan; military occupation with ecological and social damages in Okinawa, Guam, Puerto Rico, and Korea; and radiation poisoning and dispossession of COFA citizens for the purpose of nuclear weapons testing. As a result, many Hawai‘i residents suffer from psychological, physical, and intergenerational traumas that are exacerbated by retention of these lands for active military training. The EIS should address the disparate impacts that these leases will have on these communities. These military training lands are situated in communities that are majority working-class, people of color, and Native Hawaiian. Kahuku, Wai‘anae, and Wahiawā already disproportionately bear the burden of negative environmental consequences resulting from industrial and governmental uses of lands and resources. These communities deserve the same protection from environmental and cultural harm enjoyed by other more socio-economically privileged communities. The EIS should consider the impacts of these leases in the context of the broader environmental justice issues faced by these communities. Retention of these lands entails further ecological damage to endangered species, soil and geological resources, and water resources. For example, in Kawailoa-Poamoho, the terms of the current lease prevented these critical conservation lands from being categorized as a Natural Reserve Area (NAR), which provides the highest form of conservation and protection to areas that are representative examples of Hawaiian biological ecosystems. In Kahuku, the area has become greatly infested with Chromalaena odorata, Devil Weed, which arguably came from Guam Training areas on military vehicles. At Mākua, the Army was found to have breached a court-ordered settlement by failing to test marine resources that are eaten by residents of the Wai‘anae Coast to evaluate whether they posed a human health risk due to contamination from training activities. We call for any EIS to account for these kinds of negative impacts and to calculate costs of adequate funding of conservation and restoration after the return of these affected lands. In the Ching vs. Case ruling, the court found the state to have a trust duty to “mālama ‘āina” and that the state had failed to perform regular monitoring and inspections at the Pōhakuloa Training Area. Similarly, at Mākua Military Reserve, the Army has repeatedly failed to conduct required environmental and cultural studies, and in doing so, failed to fulfill court-ordered settlement obligations. Any EIS should therefore include disclosure of the extent to which the US Army and the state have complied with its obligation, HEPA, and other lease-specific conservation provisions, and include a thorough investigation of the entire parcel to determine whether there are any military debris or pollutants on the lands that the US military has been using. These three areas contain documented archaeological and historic sites, including Native Hawaiian cultural sites and resources that are still relevant for cultural practice. Impact assessments must be based on thorough surveys and subsurface archaeological investigations to determine the eligibility of sites for the National Registry of Historic Places and Traditional Cultural Properties designation and should specifically examine infringements on the National Historic Preservation Act. Many sites on these parcels are also connected physically or through mo‘olelo to registered cultural and historic sites on adjacent parcels. Oral history and ethnographic interviews with genealogical descendents and former residents of the affected areas must be incorporated into the study. The EIS should also disclose any previous monitoring and documented impacts to these sites and impact statements should address the integrity of these sites as well as the need for unrestricted cultural access. Environmental justice (EJ) as defined by the EPA requires “meaningful involvement” of impacted communities such that “decision makers will seek out and facilitate the involvement of those potentially affected.” Given the immense pressures that the COVID-19 pandemic has placed on our communities, the standard 40 day public comment period does not adequately meet the standard of meaningful engagement. Two virtual public meetings and neighborhood board presentations were conducted, but decisionmakers failed to bring opportunities for involvement to Wai‘anae, Wahiawā, or Kahuku.

Anonymous

Leave the native land alone. You've taken so much from Hawaii already. They've been stripped of their heritage and sovereignty, the least you can do is let them keep their sacred land.

Anonymous

Hello,
In 2029, land leases on Hawai'i used for military purposes will be up. The indigenous peoples of Hawai'i are demanding for their land to be returned to their hands, and so I demand the same. Please return stolen land back to the indigenous peoples who will care for and restore it, and stop any further damage to the land.
Thank you,A concerned US citizen.

Responses to Scoping Comments

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Responses to Scoping Comments

This section of the appendix provides background information, the scoping process, and responses to substantive comments received during the extended 40-day public scoping period for the Notice of Intent and Environmental Impact Statement (EIS) Preparation Notice from July 23 to September 1, 2021. The topics raised during the scoping comment period are grouped into the following categories: Background, Description of Proposed Action and Alternatives, Affected Environment and Consequences, and EIS Findings. Multiple comments were received on each of the topics. The United States (U.S.) Army (Army) response to the substantive comments raised is provided under each topic.

All public comments are valued, reviewed, categorized and included in the EIS as part of the scoping process. While the Council on Environmental Quality's National Environmental Policy Act (NEPA) implementing regulations do not require responses to scoping comments, the Hawai'i Environmental Policy Act (HEPA) outlines a scoping comment response process in HAR 11-200.1-23(c): "Written comments and responses to the substantive comments shall be included in the draft EIS pursuant to section 11-200.1-24. For purposes of the EIS public scoping meeting, substantive comments shall be those pertaining to the scope of the EIS." Out of 2,138 comments there were approximately 77 comments which were categorized as non-substantive to the scoping and EIS process. This Appendix E includes all scoping comments received, and responses to substantive topics as appropriate.

Background: EIS Process and Scope

This subsection includes responses to scoping comments on public involvement in the EIS process, Hawaiian sovereignty, lease/retention price, and live-fire training at MMR.

PUBLIC INVOLVEMENT

Commenters

Abbi Abshire

Melodie Aduja, Environmental Caucus of the Democratic Party of Hawai'i

Noelani Ahia

Carrie Alford

Raed Alsemari

Leilani Antone

Aida Ashouri

Carley Atkins

Adnan B.

Lauren Ballesteros-Watanabe

Chelsea Barbee

Lauren Blissett

Jonah Bobilin

Madison Brown

Karly Burch

Kevin Butterbaugh

Czeska Cabuhat

Amy Cameron

Michele Capobianco

Kenji Cataldo

Anna Chua, The Sierra Club of Hawai'i

Mary Clapp

Valerie Crabbe

Julia Cramer

Makanamakamaeonalani DaMate

Mara Davis

Ashley De Coligny

Manuel Wayne Makahiapo DeCosta Kuloloio

Keoni DeFranco

Sierra Dew

Tiana Dole

John Dwyer

Malia Evans

Hanalei Fergerstrom, Na Kupuna Moku O Keawe (Hawai'i Island)

Sasha Fernandes

Jonathan Fisk

Chris Foster

Representative Cedric Gates, House District 44/45

Sergi Gimenez

Makanalani Gomes

Lisa Grandinetti

Tina Grandinetti

Dee Green

Tyler Greenhill

Cameron Grimm

Shannon Hennessey

Tai Hino

Pomai Hoapili

Rebecca Hogue

Sam Ikehara

Jeanne Ishikawa, Wahiawā-Whitmore Village Neighborhood Board No. 26

Iokepa Kaeo

Kyle Kajihiro

Kaimana Kanekoa

Kawena'ulaokalā Kapahua

Aaron Katzeman

Kara Kelai

Darius Kila

Gwen Kim

Miya King

MichaelKirk-Kuwaye

Manuel Wayne Makahiapo Kuloloio

Ara Laylo

Claudia Leung

Uahikea Maile

Kaipo Matsumoto

Rebecca Mattos

Sorcha McCarrey

J. Mahealani McClellan

Meleanna Meyer

Yuri Miyabara-Treschuk

Mariana Monasi

Shelley Muneoka, KAHEA: The Hawaiian Environmental Alliance

Jarika Naputo

Luke Nemy

Theresa Ng

Jacob Noa

Amy O.

Lysandra Padeken

Katherine Peck

Representative Amy Perruso, Hawaii House District 46

Johnnie-Mae Perry

Barbara Pope

Deborah Pope

Shelly Preza

Pumehana Puaoi-Perry

India Pyzel

Jordan Ragasa

Ikaika Ramones

Michael Reimer

Andy Rivers

Sparky Rodrigues

Madelyn Rose

Kawai Santiago

Nic Santos

Taylor Saunders

Scott Seu, Hawaiian Electric

Sheela Sharma

Senator Maile Shimabukuro, Senate District 21

Samantha Snively

'Ilikea Snow

M Kehlani Souza, The Olohana Foundation

Regan Spencer

Mariette Strauss

Alisha Summers

Drew Tanda

Tlaloc Tokuda

Michael Tom

Emily Townley

Grace Tsubaki-Noguchi

Annett Mehana Unten

Ashlee Valeros

Brandon Valeros

Anna van Dorsten

Suzanne Vares-Lum

Christina Vien

Viana Villasenor

Purdyka Wahilani

Troy Wong

Kristen Young

Kalani (no last name provided)

Due to the COVID-19 pandemic and changing Emergency Proclamations and Orders at the State of Hawai'i (State) and county levels in response, there were challenges in planning multi-venue, in-person public scoping sessions on O'ahu that would accommodate the different neighborhoods affected by this EIS while abiding by local rules on gathering limits at the time of the scoping period for the EIS.

The minimum HEPA requirement for the scoping period is to hold one public meeting on the affected island and to provide opportunity for oral comments during the public meeting. During scoping logistics planning, a hybrid concept of the public scoping meetings was planned in consideration of the uncertainties of the COVID-19 pandemic. This hybrid approach facilitated in-person oral and written comments and personal engagement by members of the community while adhering to COVID-19 health and safety precautions and directives in effect at that time. The online component of the hybrid meeting was designed to allow the public to participate in and view the in-person scoping meetings on both August 10 and 11, 2021, from 6:00 p.m. to 9:00 p.m. Hawaii Standard Time. The two hybrid public scoping meetings were to be held at the Leilehua Golf Course in central O'ahu and were to include in-person meetings in addition to a live streaming feature on the U.S. Army Garrison-Hawaii (USAG-HI) YouTube channel to allow online viewing of the proceedings.

In response to the Governor's Executive Order 21-05 issued on August 10, 2021, which set greater restrictions on public gatherings, the in-person element of the public scoping meetings was canceled, and the meetings were moved entirely to an online format. Executive Order 21-05 was issued just prior to the first scoping meeting event. To inform the public of this change, signage was provided at the entrance to the meeting venue at Leilehua Golf Course notifying participants that the in-person meetings were canceled and informing them of how to participate online.

Representatives from the USAG-HI Public Affairs Office (PAO) were present at the Leilehua Golf Course and made a tablet device available to stream the webinar proceedings for members of the public who physically appeared to attend the originally scheduled in-person meeting.

Oral comments were received within the meeting timeframe through the virtual platform and through a dedicated, recorded telephone line. The telephone line was available for callers to provide comments orally for an extended period, beyond just the meeting hours required by HEPA to allow for oral comments, from 1:00 p.m. on August 10 until 11:59 p.m. on August 12, overlapping the online scoping meeting sessions.

In response to the comments received during the scoping meetings, the Army made the recordings of the virtual proceedings publicly available on the USAG-HI YouTube channel. After receiving comments about the desire to see other community members' faces, the Army attempted to shift the second evening session format to allow for video of public commenters; however, technical difficulties necessitated the format to be shifted back to the same format as the previous night.

The purpose of the scoping period is to solicit input on the range of alternatives and potentially impacted environmental resources to be analyzed for the Proposed Action. The public was also encouraged to take part in the Cultural Impact Assessment (CIA) survey, which was advertised in the Office of Hawaiian Affairs monthly publication, *Ka Wai Ola* and solicited consultations with practitioners, Native Hawaiian organizations (NHOs), stakeholders, and other individuals. The public may also provide comments during the Draft EIS public comment period.

In addition to the public scoping meetings, then USAG-HI Commander Colonel Daniel Misigoy attended a "talk story" online event with Hawai'i Legislative Representative Amy Perruso prior to the scoping period. The USAG-HI PAO also conducts periodic outreach to local stakeholders, including a Native Hawaiian advisory group.

A Neighborhood Board requested to visit the Poamoho training area, but due to the extreme terrain and slopes, a site tour would not likely be possible. A visit to the bordering edge of Poamoho may be possible by directly contacting the USAG-HI PAO.

Other scoping comments related to public involvement included the identification of other agency or stakeholder groups to notify and engage, identification of technical issues with the project website, links or other electronic communication, the adequacy of a 40-day public comment period, and the inability to have in-person meetings (due to the COVID-19 pandemic).

HAWAIIAN SOVEREIGNTY

Commenters

Paige Allen
Kelsey Amos
Joseph Anderson
Salma Argueta
Charlie Ashcom
Jake Atienza
Bronson Azama
Isabella Batts
Kelly Behan
Natasha Boteilho
Kalea Bridgemohan
Puanani Brown
Madison Brown
Mary Clapp
Bianca Clark
Kinsi Cook
Alexia Daoussis
Kimberly Dark
Mara Davis
Kate Degman
Finn Devereux
Mark Doherty
Jaqueline Duarte
Kioni Dudley
Jordan Elicker
Emmalise Enders
Wallace Engberg
Joy Enomoto, Women's Voices Women Speak
A. F.
Banner Fanene
Hank Hanalei Fergerstrom
Na Kupuna Moku O Keawe (Hawai'i Island)
Jonathan Fisk
Heather Fong
Raynae Fonoimoana
Ronald Fujiyoshi, Ohana Ho'opakele
Keiko Gonzalez
Sean Hayworth
David Henkin, Earthjustice on behalf of Malama Makua
Brittany Hite
Emily Holmberg
Arcelita Imasa, Hawaiian Committee for Human Rights in the Philippines
Iokepa Kaeo
Kaleikoa Ka'eo
Ku Kahakalau
Ricky Kahu
Kyle Kajihiro
Kendall Kaufmann
Law Kawai
Jonah Keohokapu
Kevin Kiesel
Manuel Wayne Makahiapo Kuloloio
Erin Lawrence
Maelani Lee
Ash Leslie
Victor Limon
La'akea Low
Aracely Lozano
Jessica LT
Miranda Makaruk
Joelene Manuel

Mahealani Martin
McJean
Alexis Melvin
Melanie Mendieta
Rae Michelle
Sophia Milone
Kane Kumu Honua Kama-kapu Mo'i Kamehameha, Sovereign Kamehameha Dynasty Government
Summer Kaimalia Mullens Ibrahim
Shelley Muneoka, KAHEA: The Hawaiian Environmental Alliance
Ash N.
Brian K Naeole
Courtney Nelson
Isiuwa Oghagbon
Devin Oishi
Andrea Olivas
Lysandra Padeken
Caleb Pascale
Bruce Pascua
Brittny Kulanui Perez
Brittny Perez
Sierra Ramos
Catherine Ritti
Anjoli Roy
Natalie Santiago
Jocelyn Shaw
Samantha Snively
Megan Stephenson
Melanie Stockwell
Steven Thomas
Julian Vandeventer
Rebekah Wegesend
Kenneth Wethington
Annie Wilson
Austin Windau
Kerry Yamauchi
Niyah Yisrael
Lille Youngbauer
Luis Zano
Unidentified Caller #5
Branson (no last name provided)

Over 100 scoping comments expressed concern that property rights for State-owned lands are currently misallocated, that the lands belong to the Hawaiian people, and that the State does not have the jurisdiction to confer land use rights or land ownership of these lands to the Army or any other entity. This EIS is premised on legal precedents from court rulings and public records affirming the State's right to these lands. The land use resource area section in the EIS discusses land tenure, impacts and significance of impacts under both lease and fee simple title including the impacts from the Army not retaining State-owned lands.

Scoping comments were received on environmental justice as it relates to the history of military use on Hawaiian lands, relations between the military and NHOs, and the overall current social climate regarding the military and military uses on Hawaiian lands.

Comments discussed the terms of the original 1964 leases, including the lease fee, which is seen as inequitable, and how a more equitable exchange could provide value to the Hawaiian people, such as via fair market compensation, land exchanges, and funding for Native Hawaiian community benefits. These comments are identified as perceived impacts in the environmental justice section, but specific remedies or mitigations are not identified at this time because they would be dependent on future land tenure and possible lease terms. The environmental justice analysis also considers any potential disproportionate impacts of the Proposed Action on Native Hawaiian populations.

LEASE/RETENTION PRICE

Commenters

Chloe Allen
Kelsey Amos
Joseph Anderson
Daniel Anthony
Robert Austin
Kae Bender
Halani Berard
Meredith Buck
Ts'eh Cacek
Willis Chang
Daniel Chesmore
Emma Ching
Katherine Conrad
James Dunn
Jones Elizabeth
Kapulei Flores
Alan Hayashi
Kyle Hinton
Rebecca Hutson
Jeanne Ishikawa, Wahiawā-Whitmore Village Neighborhood Board No. 26
Tanya Kauhi
Finch Kehoe
Kaili Kosaka
Theresa Kuehu
Kawena Lauriano
Maud Lawrence
Nikos Leverenz
Raudel Lopez
Jeremiah Mangini
Mariah Menor
Rebecca Pierpoint
Michael Reimer, Ph.D.
Abigail Rose
Anjoli Roy
Daniel Schlieder
Philip Schlieder, Delphi LLC
Samantha Snively
Mele Stokesberry
Greta Stuart
Summer-Solstice Thomas
John Tittle
Shika Veera
Joseph Wat
Patrick Watson
Lea Dan Yee

Comments addressed the $1 lease price of the current leases with the general sentiment expressed that the Army should retroactively make payments for perceived unfair lease costs and use those funds for community benefits, such as environmental initiatives, education, mental health resources for homeless individuals, and infrastructure improvements; and pay fair market value for any lands that are retained. Comments suggested that cheap prices devalue the resources of the land and contribute to environmental destruction. Another comment stated that the lease price should include contribution to a reserve fund for environmental cleanup.

The EIS clarifies that the current leases for the State-owned lands cannot be renewed or extended under current State laws. If the Army decides to proceed with the Proposed Action, the Army would negotiate with the State regarding one or more new land retention estates (i.e., title, lease, and easement) and any associated conditions for the selected alternatives.

Each of the parties, the Army and State, would negotiate based on its needs and obligations as is typical of any negotiation. Because negotiation options cannot be known prior to initiation of negotiation, which cannot formally begin before the conclusion of the EIS process, the potential conditions, duration, land valuation methods, and fees associated with the various land retention estates would be finalized during future negotiations.

This EIS does not include a timeline for the length of retention because the timeline is unknown and subject to future negotiations between the Army and the State based on the land retention estates available to the Army.

LIVE FIRE TRAINING AT MMR

Commenters

Lauren Harmony Blissett
Puanani Brown
Kenji Cataldo
Keoni DeFranco
Joy Enomoto, Women's Voices Women Speak
Mallory Foster
Carolyn Hadfield
David Henkin, Earthjustice on behalf of Malama Makua
Von Kaanaana
Kalani Kaanaana
Michael Kirk-Kuwaye
Kane Kumu Honua Kama-kapu Mo'i Kamehameha, Sovereign Kamehameha Dynasty Government
Moananui Peleiholani-Blankenfeld
Ikaika Pestana
Marisa Plemer
Devin Scanlan
Shoen Scott
Purdyka Wahilani
Danielle West

While resumption of live-fire training at MMR no longer being pursued by the Army and is not being evaluated in this EIS, it was raised as a concern during the scoping period by more than a dozen commenters. Comments concerning live fire pertained to noise from live-fire exercises associated with past training, desecration of the land, impacts on natural resources and cultural access, and the need for education and healing of lands formerly used for live-fire training. The Army conducted live-fire training exercises at MMR until 2004. A Federal court injunction at that time, along with subsequent rulings, restricted training operations at MMR to non-live-fire training pending sufficient completion of an EIS analyzing the impacts of live-fire training activities.

The Army subsequently completed the *Final Environmental Impact Statement for Military Training Activities at Mākua Military Reservation, Hawai'i* (MMR Live-Fire Training EIS), including analysis of resumption of live-fire training, and signed an associated Record of Decision (ROD) in July 2009 (USAEC & USACE, 2009). Additional court proceedings, however, meant that the court injunction has remained in place. The Army acknowledged to the court and the plaintiff in the court case that additional NEPA analysis is required for any proposal to resume live-fire training. Court-ordered studies for evaluation of cultural and marine resources at MMR to inform impacts of past live-fire activities were completed in 2014 and 2015, respectively. After consideration of the numerous studies completed over the course of many years, the findings of the 2009 Live-Fire Training EIS, current and foreseeable training requirements, and recent substantial changes to Army force structure, the Army has determined that it will not pursue live-fire training at MMR. For the purposes of cumulative impacts analysis in this EIS, live-fire training at MMR is not considered reasonably foreseeable.

Description of the Proposed Action and Alternatives

This subsection includes responses to scoping comments on the purpose of and need for the Proposed Action, Proposed Action and Alternatives and support for the No Action Alternative.

PURPOSE OF AND NEED FOR THE PROPOSED ACTION

Commenters

Kelsey Amos

Lauren Ballesteros-Watanabe

Patricia Blair

Henry Boothe

Anna Chua, The Sierra Club of Hawai'i

Kanoa'ihimaikalani Cleveland

Kim Compoc

Makanamakamaeonalani DaMate

Sasha Davis

Travis Delima

Pete Doktor

Joy Enomoto, Women's Voices Women Speak

Malia Evans

Peter Goldie

Scott Grinsell

Amber Herzog Lyman

Judie Hoeppner

C. M. Kaiama

Kyle Kajihiro

Lahela Kalohi-Arroyo

CJ Kee

Anna King

Christine Lanning

Constance Lau, Hawaiian Electric Industries

Gabriel Lee, American Savings Bank

Rebecca Mattos

Stanley May

Brenda McCallum

Nedi McKnight

Linda Muralidharan

John Olszowka

Jay Rachels

Michael Reimer, Ph.D.

Anjoli Roy

Erin Rutherford

Ryan-Lowary Sam Fong

Philip Schlieder, Delphi LLC

Scott Seu, Hawaiian Electric

Jack Shriver, Honolulu Council, Navy League of the US

M Kehlani Souza, The Olohana Foundation

Lexis Wallace

Jaclyn Weiss

Sara Williams

Jennifer Woo

Colonel Ann Wright, Veterans For Peace, Chapter 113-Hawai'i

Hanalei (no last name provided)

The purpose and need statements presented in **Chapter 1** of the EIS describes the reasons why the Proposed Action is needed by the Army for military training and support purposes and why it needs to be located on O'ahu. Comments received on the purpose and need questioned the locational need to train in Hawai'i with the evolution of military training technology and changes in how training is conducted which could also possibly lessen the quantity of land needed. Other potential uses unrelated to ongoing levels, types, and tempo of training activities are not within the scope of this EIS.

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

Terminating the use of the State-owned lands would substantially impact the ability of U.S. Army Hawaii (USARHAW) and other military services in USINDOPACOM to meet their training requirements and mission of combat readiness. Without the ability to meet minimal training requirements at the O'ahu training areas with State-owned lands, training capabilities for home-stationed troops in Hawai'i would be insufficient, and readiness levels in the USINDOPACOM region would be compromised. Relocating training elsewhere does not satisfy the purpose and need for the Proposed Action. **Chapter 1** of the EIS

provides additional information on the importance of Hawai'i and the O'ahu training areas to the U.S. military.

The Proposed Action is needed to provide austere training environments in support of USARHAW-coordinated training, preserve maneuver training areas, enable access between U.S. Government-controlled lands on O'ahu, provide a buffer from encroachment (and accidental or intentional trespassing) on U.S. Government-controlled land, retain infrastructure investments, and allow for future facility and infrastructure modernization, particularly with respect to the austere training environments combined with varied maneuver training areas that the O'ahu topography provides. The landscape found in these training areas is ideal to provide a realistic training environment. The Army needs large quantities of land, away from populated areas, to provide the training necessary to maintain soldier readiness for rapid deployment and to ensure both soldier and public safety. State-owned lands on O'ahu include areas with sufficient slopes for safe maneuver area that is critical to Army training. Retention of maneuver area on State-owned lands is important for maneuver training for company-sized units. The level and timing of compliance with lease terms related to vacating the property, including cleanup required, would be contingent upon which alternative is selected and the method of retention.

Army management of threatened and endangered species and historic and archaeological sites is not directly related to the Proposed Action, and prior NEPA actions or other regulatory compliance may determine how these activities are conducted. Any impacts or consequences that these alternatives may have on these resources due to the changed boundaries of the State-owned lands retained are analyzed and discussed in **Chapter 3**. The management of endangered species, habitat, and historic and archaeological sites are activities that are subject to separate Federal regulatory review under Section 7 of the Endangered Species Act and Section 106 of the National Historic Preservation Act, respectively, which are discussed in **Section 1.4.3**. The lease compliance actions and return of lands, as it relates to cleanup and restoration, are discussed below.

PROPOSED ACTION AND ALTERNATIVES

Commenters

Kerstyn Afuso

William Aila, Jr., Hui Malama 'O Makua

Raed Alsemari

Kelsey Amos

Kathleen E Brizuela Absalon

Puanani Brown

Sophie Cann

Liam Chinn

Carl Christensen

Matthew Dekneef

Kiersten Faulkner, Historic Hawaii Foundation

Mallory Foster

Representative Cedric Gates, House District 44/45

Marina Ghin

David Henkin, Earthjustice on behalf of Malama Makua

Bianca Isaki Ph.D., Esq.

Jeanne Ishikawa, Wahiawā-Whitmore Village Neighborhood Board No. 26

Kyle Kajihiro

Sydney Keli'ipuleole, Native Hawai'i Chamber of Commerce

Kevin Kiesel

Anna King

TC Knowles

Oriana Leao

William Liggett

Kane Kumu Honua Kama-kapu Mo'i Kamehameha, Sovereign Kamehameha Dynasty Government

Shelley Muneoka, KAHEA: The Hawaiian Environmental Alliance

Johnnie-Mae Perry

Lopaka Purdy

Michael Reimer, Ph.D.
Kady Riggan
Robert Robello
Anjoli Roy
Nic Santos
Christopher Seals
Senator Maile Shimabukuro, Senate District 21
Drew Tanda
Adam Tuifagu
Sunny Unga
Karen Vitulano, US EPA, Region IX
Purdyka Wahilani
Amy Wasielewski
Patrick Watson
Anastacia Wolfgramm-Pineda
Colonel Ann Wright, Veterans For Peace, Chapter 113-Hawai'i
Tyler (no last name provided)
Kahuku Community Association Board

The Proposed Action (i.e., retention of up to approximately 6,322 acres of State-owned lands at KTA, Poamoho, and MMR) is a real estate action (administrative action) that would enable continuation of ongoing activities on the State-owned lands retained. The Proposed Action does not include construction or changes in military training activities or changes to resource management actions. Additionally, the Proposed Action does not include changes to the use, size, or configuration of the Special Use Airspace overlying the State-owned lands. The type, volume, and conduct of training, maintenance, and repair activities, and the resource management actions currently occurring at the three training areas are described in **Chapter 2** of the EIS. Future changes in training activities; facility and infrastructure modernization or construction actions; other changes in training, maintenance, and repair activities; or resource management actions on the State-owned lands would be analyzed under separate, future NEPA/HEPA actions, as applicable.

Comments received pertaining to the Proposed Action and Alternatives included a concern if the level of acreage is needed for the various alternatives, and whether technology advances allow for less land required for training. Additional comments suggested analyzing the benefits that may accrue to the community and opportunity costs of selecting the No Action Alternative. Several comments also requested that the name of the EIS should include the word "return" as opposed to "retain." The intent for the EIS is for the Army to consider whether, and how much, land would be retained, and the environmental impacts from such. The EIS presents and analyzes a range of alternatives that represent varying levels of retention, as well as the No Action Alternative, under which no State-owned lands would be retained.

The three action alternatives presented in this EIS were identified through a detailed screening process. Prior to the initiation of the EIS, the Army evaluated alternatives to the Proposed Action (e.g., virtual-only training, relocation of training to other areas within and outside of Hawai'i), which are briefly discussed in **Chapter 2** of the EIS. These alternatives are not reasonable alternatives because they are alternatives to implementing the Proposed Action (i.e., a form of land retention), not alternatives for implementing the Proposed Action. These alternatives do not satisfy the purpose and need statements and do not meet the screening criteria; therefore, they were not brought forward for analysis in the EIS. Likewise, alternatives identified during scoping that are not associated with the Proposed Action (e.g., return all O'ahu training areas to the State, change training types, diplomacy) are not reasonable alternatives for the Proposed Action.

Reasonable alternatives must satisfy the purpose of and need for the Proposed Action and meet the screening criteria based on the purpose and need statements. **Chapters 1** and **2** of the EIS describe the Proposed Action, purpose and need statements, and screening criteria. Alternatives 1, 2, and 3 adequately meet the purpose and need and all screening criteria and have been carried forward for detailed analysis

in this EIS. Alternatives that were considered by the Army but do not adequately meet one or more of the screening criteria (i.e., Alternative 4: Retention of Only Access, Utilities, and Infrastructure; Alternative 5: Retention with Training and Modernization Limitations; Alternative 6: Short-term Retention; Alternative 7: No Retention, Halted Training, and Engaged Diplomacy; Alternative 8: Transfer to a Third Party for Continued Stewardship of Resources; and Alternative 9: No Retention, and Move All MMR Training Elsewhere) are addressed in **Chapter 2** of the EIS; however, these alternatives are not carried forward for detailed analysis.

In addition to discussing the Proposed Action, **Chapter 2** of the EIS summarizes the training areas, facilities, utilities, and infrastructure within the State-owned lands; current activities conducted within the State-owned lands, including conservation efforts; and land retention estates available to the Army. **Chapter 3** of the EIS details the affected environment, including region of influence (ROI), and potential environmental consequences of the Proposed Action.

Chapter 2 of the EIS also describes lease compliance actions (e.g., reforestation, removing signs, removing or abandoning structures, and removing weapons and shells) and return of State-owned lands not retained that would be triggered via lease expiration under Alternative 2, Alternative 3 (MMR only), and the No Action Alternative. Per the leases, the lease compliance actions may occur after expiration of the lease. The leases include provisions regarding the technical capabilities and economic costs associated with the lease compliance actions. The Army would conduct the lease compliance actions and return the State-owned land not retained in accordance with the leases or otherwise negotiated with the State. The parameters for lease compliance actions would be defined and determined after completion of the EIS. It is assumed that lease compliance actions would occur under various DoD programs. Additionally, it is assumed that investigation, removal, and cleanup of hazardous substances and wastes, including munitions and explosives of concern (MEC), within the State-owned lands not retained would occur under the Comprehensive Environmental Response, Compensation, and Liability Act.

SUPPORT NO ACTION

Commenters

Marie Abaya
Heiley Acoba
Anna Acosta
Alex Adams
Sheyla Adaya
Nico Addams
Melodie Aduja, Environmental Caucus of the Democratic Party of Hawai'i
Daniela Aguirre
Christine Ahn
Kylie Akiona
Nancy Aleck
Chloe Allen
Eli Allison
Miguel Almodovar
Xochitl Alvarado
Mychaela Anderson
Teressa Anderson
Nathan Anderson
Michael Andrews
Jeanette Aquino
Rachel Arasato
Adrienne Arcilla
Diana Arias Garcia
Madison Armentrout-Minjarez
Michelle Arvizu
Corey Asano
Miles B.
Sarah Baker
Christina Balderas
May Balino-Sing
Cooper Barnard-Mayers
Avrey Baron
Lauren Bastellesteros-Watanabe
Victoria Bayang

Anne Bayne
Jim Bearden
Virginia Beck
Shelby Becker
Melanie Bellomo
Annie Ellen Benavidez
Polly Bentley
Jessica Bidon
Lauren Biglow
Alex Bishop
Zoe Black
Patricia Blair
Samantha Blalock
Alyssa Bland
Lauren Harmony Blissett
Maria Bortolaso
Chelsea Boyle
Elisabeth Bragale
Alyssa Brooks
Kysha Brown
Puanani Brown
Kimberly Buck
Andrea Buckman
Michelle Cabalse
Ellen-Rae Cachola
Laura Cahill
Olivia Camacho
Chantell Cambia
Jordan Cameron
Benita Campbell
Marguerite Campbell MPH
Bri Caprisun
Montana Cardinal
Hana Castillo
Dillon Castro
Kenji Cataldo
Nicholas Chagnon
Megan Chamberlain
Grace Chang
Cassidy Chang
Tiffany Chater
Evelyn Chorush
Allegra Christianscher
Mariko Cilley
Amanda Clemmons
Kanoa Cleveland
Kanoa'ihimaikalani Cleveland
Marlene Coach-Eisenstein
Janna Coble
Natai Collins
Marisa Conners
Mara Cooper
Jasmine Cooper
Caroline Corry
Stephanie Cotumaccio
Marlee Craker
Nicole Cristobal
Dana Crocker
Sydney Crowe
Ilse Cruz Cordova
Michelle Current
Charlotte Curry
Megan Dalley
Sasha Davis
Arrianna Dawes
Julien De Jesus
Royce De Jesus
Keoni DeFranco
Bonnie Delgado
Renae DeLucia
Maya Deshpande
Jordan Devillanueva
Mildred Diaz
Willow Diller
Kamuela Don Napoleon
Madison Donaldson
Emily Donovan
Holly Drummond
Tara Dubin
Siobhan Duncan
William Duncan
Rebekah Duncan
Taylor Duplantier
Melissa Edwards
Jade Elyssa Rivera
Joy Enomoto, Women's Voices Women Speak
Sofronio Estores
Jessica Estrada
Chris Etzkorn
Samantha Euston
Lu Faborito, Makaha Hawaiian Civic Club
Jessie Faige
Rose Fairchild
Lynn Feinerman
Callista Fernandez
Anne Fey
Jonathan Fisk
Lauren Flanagan
Elena Floren
Emily Ford
Cheyenne Foreman
Mallory Foster
Bayden Fraley
Marisa Franco
Noah Freeman
Reydan Freitas
Forest Frizzell

Sophie Frost
Natalie Gaffney
Amanda Gaglio
Diana Garcia
Abigail Garcia
Renee Garcia
Reem Gawish
Hannah Givertz
Kaylan Godfrey
Brianna Golden
Kim Goll
Jhiana Gomes
Julie Gomez
Keiko Gonzalez
Donjai Green
Zoey Greer
Regina Gregory
Leanne Grossman
Yuejia Gu
Taylor Guasta
Leila Guevera
Shruti Gumate
David Gurrola
Dana (Mae) Ha
Carolyn Hadfield
Catherine Hage
Michael Hahn
Jessica Halpin
Tom Halpin
Karl Hamann
Rachael Han
Joseph Han
Christina Hang
Paige Hansen
Chloe Hartwell
Kate Haupt
Savannah Hawkins
David Henkin, Earthjustice on behalf of Malama Makua
Shannon Hennessy
Kyara Heredia
Sarah Heritage
Sherry Hester
Nathan Hester
Rebecca Hill
Carol Hirth
Jennifer Ho
Vera Hoang
Molly Hoffman
Emily Holmber
Rachel Huang
Ting Huang
Jane Huff
Angela Huntemer
Rebekkah Hunter
Ramona Hussey
Sam Ikehara
Mana Iluna
Gabriela Indivero
Mike Inouye
Tom Iwanicki
Kelsey Jackson
Karen Jeffery
Emily Johns
Shanti Jourdan
Linda Jury
Erica K
Krysten Ka'ai
Von Kaanaana
Kalani Kaanaana
Iokepa Kaeo
Kyle Kajihiro
Leah Kanae
Kanaloa Kane
Hope Kaneakua
Kyungmin Kang
Vagmi Kantheti
Dani Kaohe David
Piilani Kaopuiki
Ku'ulani Kato
Kiana Kelae
Mabel Ann Keliihoomalu
Emmeline Kelley
Courtney Ann Keohuloa
Punahele Kikipi
Soon Kim
Gwen Kim
Hideki Kimukai
Aya Kimura
Michael Kirk-Kuwaye
Emma Koa
Theresa Kuehu
Mariah L.
Koalani Lagareta
Koalani Lagaretti
Mary Lagomarsino
Marygail Lakner
Lu Ann Lankford-Faborito, Makaha Hawaiian Civic Club
Bryanna Lantych
Michael Lawler
Krysta Lawrence
Caitlin Lee
Ona G. Lee
Maelani Lee
Lisa Lemke
Ana Denisse Lepes Sanchez
Maelia Leslie

Kadence Letua
Selah Levine
Danny H.C. Li
Meredith Linhart
Rimona Livie
Ashley Livingston
Nanea Lo
Joy Loo
Julie M.
Eleanor M. Eisler
Navroop Maan
Roop Maan
Sage Mackenzie
Elise Maize
Gladis Marquez
Malia Marquez
Dylan Marquis
Indira Martinez
Lahela Mattos
Tori McAllister
Finn McFadden
Gigi McGaughey
Kahoiwai McGee
Kyleigh McGuire
Keith McHugh
Adriene McNeil
Teddy McNerney
Alfred Medeires
Alfred Keaka Hiona Medeiros
Jaerick Medeiros-Garcia
Larry Meisgeier
Fabienne Melchior
Martin Melkonian
Veronica Messer
Lola Mestas
Joe Meyers
Erick Michaelson
Andie Miller
Mari Miller
Lyn Milo
Colleen Minarich
Madison Minjarez
Kane Kumu Honua Kama-kapu Mo'i Kamehameha, Sovereign Kamehameha Dynasty Government
Mitchell Molloy
John Momenty
Shirlena Monroe
Nadine Morris
Abigail Mountz
Shelley Muneoka, KAHEA: The Hawaiian Environmental Alliance
Kelsey Murphy
Monica Musgrave
Sophia Muus
Megumi Nakama
Karen Nakasone
Brittany Namauu
Charla Naone
Spencer Ng
Haley Nichols
Margaux Nielsen
Elizabeth Oakes
Shambrea Oliver
Zyreal Oliver-Chandler
Willow Olson
Catherine Orleans
Preston Ornellas
Kathryn ORourke
Kiana Otsuka
Micah Pacatang
Megan Padua
Koohan Paik-Mander
Kyle Paist
Amy Palmer
Jaidyn Pang
Magda Papaioannou
Jaquelyn Parker
Lee Parks
Minerva Patino
Michaela Patton
Ashalie Pawe
Jessica Payton
Moananui Peleiholani-Blankenfeld
Elaina Perry
Johnnie-May Perry
Ikaika Pestana
Manny Petersen
Melodi Pierro
Heidi Pihana
Marisa Plemer
Grant Porter
Erin Potter
Caroline Powers
Leslie Pyo
Cam Quevedo
Sarah R.
Miriam Ragsdale
Sufia Rai
Emily Rainey
Anna Rambow
Laura Ramirez
Dylan Ramos
Chris Raynes
Makana Reeves
Michael Reimer

Alondra Reyes
Jacky Reynaga
Marie Richards
Diana Richardson
Juanita Rivas
Willow Roberts
Kaylin Rogers
Tara Rojas
Abigail Rose
Alexa Rose
Susan Rosier
Julia Ruch
Samantha Sanchez
Elisa Sanchez
Brittany Sandoval
Kristi-Ann Say
Devin Scanlan
Elena Schaef
Shoen Scott
Hannah Sennett
Alika Seto
Julia Seydel
Sheila Shahbazi
Geoff Shaw
Devika Shenoy
Elizabeth Sheppard
Elise Sherrill
Alana Siaris
Jennifer Silva
Karla Silva-Park
Jess Sobocinski
Ikaika Solomon
Jincy Songer
JoNelle Sood
Phoebe Spague
Mallory Spencer
Geraldine Spiegle
Nicole Squassoni
Malika Steen
A.L. Steiner
Judith Stetson
Jessica Stevenson
Sam Stiles
Robert Stiver
Hannah Streeter
Hal Strough
Josiah Stuart
Greg Sullivan
Liysa Swart
Amanda T.
Samantha Makahi Tanuvasa
Kelsey Taylor
Jordyn Taylor
June Taylor
Renee Tedder
Christopher Telomen
Arianna Terlitsky
Hannah Thao
Tlaloc Tokuda
Melissa Tomlinson
Juana Torres
Dana Torrico
Mickey Tran
Carolyn Treadway
Samantha Trevino
Jenny Trollman
Ashley Trotter
Virginia Trowbridge
City Councilmember Heidi Tsuneyoshi, District 2
Adam Tuifagu
Adrienne Turner
Frederick Tyres
Kamalani Uehara
Tavia Ukauka
Andrea Valencia
Mia Vergari
Elizabeth Villasana
Kaukaohu Wahilani
Purdyka Wahilani
Danielle West
Ashleigh Whitman
Jade Wilber
Beverly Wilkinson
Vernon Wilson
Julia Withers
Deanna Wong
Symia Woodson
Georgette Woolsey
Ang Woon
Colonel Ann Wright, Veterans For Peace, Chapter 113-Hawai'i
William Wu
Melissa Wyant
Kami Yamamoto
Bean Yogi
Kristen Young
Jess Young
Karen Young
Audrey (no last name provided)
Brianna (no last name provided)
Daniel (no last name provided)
Diana (no last name provided)
Gabriel (no last name provided)

Giovanna (no last name provided)
Heather (no last name provided)
Holly (no last name provided)
Ilona (no last name provided)
Isabel (no last name provided)
Jerry (no last name provided)
Katie (no last name provided)
Kennedy (no last name provided)
Leila (no last name provided)
Rachel (no last name provided)
Ronnie (no last name provided)
Senti (no last name provided)
Shanny (no last name provided)
Shelley (no last name provided)
Tawna (no last name provided)
Kahuku Community Association Board
Unidentified Caller #1
Unidentified Caller #3
Unidentified Caller #4
Unidentified Caller #8
Unidentified Caller #9
Unidentified Caller #12
Unidentified Caller #13

One of the recurring themes of scoping comments was to "support no action." Approximately 475 comments reflected a preference to see the current leases expire and no new leases for the Army. Under the No Action Alternative, none of the State-owned lands at the three training areas would be retained; however, Poamoho is the only area where the entirety of the property is State-owned. The Army would still conduct training at KTA and MMR within U.S. Government-controlled land. Comments requested that the Army be required to clean up MEC and contaminants, and restore the properties to their pre-lease conditions. Comments also noted that the No Action Alternative was not being treated as an actual option analyzed in this EIS, but rather a comparative baseline. The Army is committed to complying with Federal and State regulations and lease terms as they apply to these properties. Applicable regulatory compliance and conditions are presented in **Sections 1.4**, **3.2**, **3.5.2**, **3.7.2**, **3.8.2**, and **Appendix J** of the EIS. The No Action Alternative is analyzed in parallel with the action alternatives in the EIS.

Affected Environment and Consequences

This subsection includes responses to comments on the ROI; land use; biological resources; cultural resources; hazardous substances and wastes; air quality and greenhouse gases (GHG); noise; geology, topography, and soils; water resources; socioeconomics; environmental justice; transportation and traffic; and human health and safety.

Region of Influence

Commenters

Angela Huntemer-Sidrane
Kyle Kajihiro

There were two specific comments related to the ROI. One comment recommended that flora and fauna studies be reviewed within five miles outside the boundaries of the project areas. The other comment was related to expanding the ROI to include downstream, downwind, underground, overhead and visual landscapes and soundscapes. The ROI for potential impacts is defined and addressed for each resource area in **Chapter 3** appropriate to the characteristics of that resource. The ROI for cumulative impacts may be larger than the ROI for impacts from the Proposed Action, and these factors are considered for each individual resource area in the environmental consequences analysis in **Chapter 3** of the EIS.

LAND USE

Commenters

Abbi Abshire

Melodie Aduja, Environmental Caucus of the Democratic Party of Hawai'i

Noelani Ahia

Carrie Alford

Raed Alsemari

Kelsey Amos

Leilani Antone

Carley Atkins

Adnan B.

Lauren Ballesteros-Watanabe

Chelsea Barbee

Dylan Barr

Ad Beekmeijer

Lauren Blissett

Jonah Bobilin

Kathleen E Brizuela Absalon

Puanani Brown

Madison Brown

Cheryl Burghardt

Czeska Cabuhat

Amy Cameron

Kenji Cataldo

Susan Ching Harbin

Carl Christensen

Mary Clapp

Valerie Crabbe

Makanamakamaeonalani DaMate

Diana Dannoun

Mara Davis

Ashley De Coligny

Keoni DeFranco

Matthew Dekneef

Sierra Dew

James Doherty

Tiana Dole

Jamie Echols

Jordan Elicker

Vanessa Esprecion

Malia Evans

Mary Alice Evans, State of Hawai'i Office of Planning & Sustainable Development

Kiersten Faulkner, Historic Hawaii Foundation

Sasha Fernandes

Jonathan Fisk

Chris Foster

Representative Cedric Gates, House District 44/45

Sergi Gimenez

Makanalani Gomes

Marshall Gooch

Lisa Grandinetti

Tina Grandinetti

Tyler Greenhill

Regina Gregory

Cameron Grimm

Jamie Hearn

David Henkin, Earthjustice on behalf of Malama Makua

Shannon Hennessey

Tai Hino

Pomai Hoapili

Rebecca Hogue

Renee Hoomanawanui

Ivy Hsu

Jeanne Ishikawa, Wahiawā-Whitmore Village Neighborhood Board No. 26

Kalani Kaanaana

Iokepa Kaeo

Ku Kahakalau

Kyle Kajihiro

Kawena'ulaokalā Kapahua

'Alihilani Katoa

Aaron Katzeman

Kara Kelai

Gwen Kim

Miya King

Michael Kirk-Kuwaye

Kevin Landers

Ara Laylo

Nicole Leonard

Claudia Leung

Uahikea Maile

Rebecca Mattos

Sorcha McCarrey

Douglas McCracken

Kalia Medeiros

Meleanna Meyer

Yuri Miyabara-Treschuk

Rita Miyamoto

Mariana Monasi

Nathan Nahina

Makana Nalehua

Jarika Naputo

Luke Nemy

Natalie Nimmer

Jacob Noa
Amy O.
Shannon Lokelani Oberle
Lena Orlando
Kiana Otsuka
Micah Pacatang
Lysandra Padeken
Aleka Pahinui
Amy Parsons
U'ilani Perry
Barbara Pope
Deborah Pope
Shelly Preza
Pumehana Puaoi-Perry
India Pyzel
Jay Rachels
Jordan Ragasa
Ikaika Ramones
Andy Rivers
Anjoli Roy
Kawai Santiago
Taylor Saunders
Sheela Sharma
Senator Maile Shimabukuro, Senate District 21
Samantha Snively
'Ilikea Snow
Rachel Solís
Mariette Strauss
Alisha Summers
Drew Tanda
Carol Titcomb
Michael Tom
Emily Townley
Grace Tsubaki-Noguchi
Annette Mehana Unten
Ashlee Valeros
Brandon Valeros
Anna van Dorsten
Christina Vien
Viana Villasenor
Karen Vitulano, US EPA, Region IX
Purdyka Wahilani
Patrick Watson
Gail Weininger
John & Lucy Witeck
John Witeck
Anastacia Wolfgramm-Pineda
Troy Wong
LeaDan Yee
Kristen Young
Tyler (no last name provided)
Unidentified Caller #6

Comments received expressed concern for public access (for recreational and cultural practices) of ceded lands that are in public trust for the benefit of the community and public access trails. Impacts on recreation at the training areas are analyzed in **Section 3.2.5**. Existing recreational uses and impacts, and current conditions, including agreements, that allow and restrict access to these recreational facilities are discussed in **Sections 3.2.5.1** (KTA), **3.2.5.2** (Poamoho), and **3.2.5.3** (MMR), and provisions for cultural access are discussed under Cultural Access Policies for each training area in **Section 3.5.5**. Current programs for preservation, restoration, and educational efforts are described in **Chapter 2** and **Section 3.3.5**.

The Land Use section of the EIS (**Section 3.2**) describes the State-owned lands currently leased by the Army at KTA, Poamoho, and MMR, based on Federal, State, and City and County of Honolulu laws and classifications of land tenure. Concerns were expressed over the use of conservation and agricultural lands for military training and the compatibility with current land use regulations and policies.

Current and historical uses, including district designations and applicability, and compliance with land use regulations and policies are discussed. Environmental consequences of past, present, and reasonably foreseeable actions are analyzed in this section.

Comments on potential impacts from the retention of the State-owned lands within the agricultural and conservation districts are addressed in the environmental consequences portion of **Section 3.2**. Further State decisions (i.e., by the Land Use Commission and/or BLNR) would be required if an alternative were selected where State-owned lands were retained for the continuation of military training activities. The

EIS also analyzes the impacts of the overall loss of land in a fee simple process and military use in areas where it is not zoned for such a use.

Conservation subzones (i.e., Resource, Limited, and Protective) are identified for the State-owned portions of KTA, Poamoho, and MMR. Military use is currently not a permitted use in either the conservation or agricultural districts (see discussion in **Section 3.2**)**.** The Hawai'i Coastal Zone Management program as it relates to HRS Chapter 343 requirements is addressed in **Section 4.3**. The Proposed Action does not anticipate changes to existing uses or previous existing agreements for public beach access and use of Mākua Beach Park and Yokohama Beach Park under the management of Ka'ena Point State Park. State and city/county agency roles and responsibilities described in this EIS are limited to those associated with land not retained by the Army.

Several comments discussed the rightful ownership of the State-owned lands leased by the Army, the status of ceded lands, or lands held in trust. All the State-owned lands associated with the Proposed Action have been identified as ceded lands. Ceded lands consist of either Crown or government land until 1893, when the Hawaiian Kingdom was overthrown. Tenure of ceded land has evolved over time, and ownership is currently held by both the State and Federal governments. An overview of ceded land tenure in Hawai'i is provided in **Section 3.2**. The history of land ownership for each parcel is not analyzed in this EIS, but records of Land Commission Award claims that were previously granted and historical accounts that were found are presented under the Historical Overview subsections of **Sections 3.4.5.1** (KTA) and **3.4.5.3** (MMR); there are no such known accounts for Poamoho.

Comments were received requesting that the EIS evaluate the possible land tenure options, in addition to fee simple title acquisition, across all alternatives and the no action alternative. The EIS analyzes a range of land retention options to implement the Proposed Action (adding lease, fee simple title, easement, and license) and impacts from those land tenure options brought forward for analysis, where applicable in resource area sections. The Proposed Action as stated in the EIS, to retain State-owned lands at the O'ahu training areas, is analyzed for lease and fee simple title methods of land retention. Army Regulation (AR) 405-10 authorizes various estates for land retention, including fee simple title (full ownership), lease, easement, and license. The potential conditions assumed with the various land retention estates are stated in **Section 2.4** and **Appendix G**.

Section 3.2.5 provides a description of the 1959 Admissions Act (Public Law 86-3, 73 Statute 4), which admitted Hawai'i into the United States; approximately 1.4 million acres of the lands that were transferred to the new State of Hawai'i had a trust status, and the revenues from these lands were to be used for public purposes, including "for the betterment of the conditions of native Hawaiians."

The proposed Natural Area Reserve (NAR) designation at Poamoho is detailed in **Section 3.2.5.2** under Land Tenure. Further concerns about the compatibility of military land use with conservation efforts and related cleanup efforts are addressed in **Sections 3.3** and **3.6** , respectively. In response to the request for the EIS to present historical photos over the last 65 years of Kawailoa-Poamoho Training Area (Poamoho), this is not part of the scope of this study. The consistency review for the Federal Coastal Zone Management Act is discussed in **Chapter 4**.

The purpose of this EIS is to analyze the retention of these State-owned lands for military use under different alternative scenarios (i.e., full retention, modified retention, and minimum retention) to sustain current training and combat readiness requirements. Commenters suggested several alternative uses to

consider for the future should land not be retained by the Army and returned to the State, such as natural open space, national park, agriculture, hunting, renewable energy, housing, other non-military uses, Hawaiian homesteads, traditional Native Hawaiian uses and preservation. Analysis of other alternative uses are not within the scope of this EIS. Any change in the proposed uses of these State-owned lands may be undertaken in a separate environmental review. KTA Tract A-1 is currently zoned agricultural district. Analysis of Important Agricultural Land designation nor other non-military uses for land not retained is outside the scope of this EIS.

BIOLOGICAL RESOURCES

Commenters

Abbi Abshire
Melodie Aduja, Environmental Caucus of the Democratic Party of Hawai'i
Noelani Ahia
Rosanna Alegado
Carrie Alford
Raed Alsemari
Leilani Antone
Aida Ashouri
Carley Atkins
Bronson Azama
Adnan B.
Lauren Ballesteros-Watanabe
Chelsea Barbee
Alex Bishop
Lauren Blissett
Jonah Bobilin
Henry Boothe
Puanani Brown
Madison Brown
Meredith Buck
Karly Burch
Mauna Burgess
Czeska Cabuhat
Amy Cameron
Kenji Cataldo
Solomon Champion
Susan Ching Harbin
Carl Christensen
Mary Clapp
Valerie Crabbe
Makanamakamaeonalani DaMate
Diana Dannoun
Mara Davis
Ashley De Coligny
Keoni DeFranco
Sierra Dew
Tiana Dole
James Dunn
Malia Evans
Mary Alice Evans, State of Hawai'i Office of Planning & Sustainable Development
Rose Fairchild
Sasha Fernandes
Jonathan Fisk
Chris Foster
Jonathan Galka
Representative Cedric Gates, House District 44/45
Sergi Gimenez
Makanalani Gomes
Lisa Grandinetti
Tina Grandinetti
Dee Green
Tyler Greenhill
Cameron Grimm
Michael Hadfield
Shannon Hennessey
Pomai Hoapili
Rebecca Hogue
Chandler Holland, Red Ridge, NC
Angela Huntemer-Sidrane
Andrea Kaaawa
Kalani Kaanaana
Iokepa Kaeo
Kyle Kajihiro
Kawena'ulaokalā Kapahua
'Alihilani Katoa
Aaron Katzeman
Kara Kelai
Darius Kila
Gwen Kim
Miya King
Michael Kirk-Kuwaye
Kari Leah Labrador
Mary Lacques
Ara Laylo
Oriana Leao

Russell Leong
Claudia Leung
Nikos Leverenz
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Taylor Marsh, Native Ecosystem Services
Rebecca Mattos
Sorcha McCarrey
Shannon McClish
Douglas McCracken
Denise Medeiros
Meleanna Meyer
Yuri Miyabara-Treschuk
Mariana Monasi
Shelley Muneoka, KAHEA: The Hawaiian Environmental Alliance
Zack Murphy
Makana Nalehua
Jarika Naputo
Luke Nemy
Jacob Noa
Amy O.
Lysandra Padeken
Aleka Pahinui
Amy Parsons
Ingrid Peterson
Hilina'i Pokely
Barbara Pope
Deborah Pope
Shelly Preza
Pumehana Puaoi-Perry
India Pyzel
Jordan Ragasa
Ikaika Ramones
Andy Rivers
Kawai Santiago
Taylor Saunders
Sheela Sharma
Jacob Shearer
Senator Maile Shimabukuro, Senate District 21
Jack Shriver, Honolulu Council, Navy League of the US
Joseph K. Simpliciano Jr.
Nicholas Smith
Samantha Snively
'Ilikea Snow
Matthew Stelmach
Mariette Strauss
Drew Tanda
Carol Titcomb
Michael Tom
Emily Townley
Annette Mehana Unten
Ashlee Valeros
Brandon Valeros
Christina Vien
Viana Villasenor
Karen Vitulano, US EPA, Region IX
Kalyn Wadsworth
Purdyka Wahilani
Lauren Watanabe
Joe Wilson
Austin Windau
John Witeck
Anastacia Wolfgramm-Pineda
Troy Wong
Kristen Young
Shuochen Zheng
Native Hawaiian Chamber of Commerce
Unidentified Caller #2

During the scoping period, public comments on biological resources identified concerns regarding training-related noise impacts; habitat loss; invasive species (primarily around noxious weeds); loss and protection of rare, Federal- and State-listed species, and species of greatest conservation concern and their associated habitats; wildfire; species of cultural significance; the status of the proposed NAR; and impacts from historical live fire at MMR. Noise impacts on wildlife are analyzed in **Section 3.8** and native flora and fauna that have special cultural significance to Native Hawaiians are discussed in **Section 3.5** and **Appendix B**.

Section 3.3 reviews and incorporates all available natural resources studies within the ROI for each of the training areas. While no new studies will be completed as part of this EIS, the Army identified future projects and research to aid in the continued conservation of protected and native species within the O'ahu training areas. Some completed/ongoing studies include post-fire restoration techniques, native habitat restoration to support protected and native species, invasive species control methods, and life

history and viability analyses for listed species. Invasive species control methods research includes mechanical, chemical, and biological control techniques (USAG-HI, 2010b).

Live-fire training has not been permitted or conducted on MMR since 2003 when a Federal court injunction restricted MMR operations to non-live fire pending completion of an EIS and supporting marine and cultural resources studies that sufficiently analyze the impacts of live-fire training activities (U.S. District Court, 2006; U.S. District Court, 2012). The marine and cultural studies were completed by 2015, and a court injunction remains in place. The Army has no plans to resume or propose resumption of live-fire training at MMR.

The Army retention of State-owned lands on O'ahu has the potential to result in increased wildland fire potential, wildlife disturbance, habitat loss, and infestation of noxious weeds and other invasive species. All U.S. military installations are required to have an Integrated Natural Resource Management Plan (INRMP) to provide technical guidance to those responsible for land use planning and decision-making. The INRMP, developed in cooperation with the U.S. Fish and Wildlife Service (USFWS) and State Division of Forestry and Wildlife, serves as a tool for planning and integrating land resources compliance and management activities with the military mission.

The 2003 *Biological Opinion of the U.S. Fish and Wildlife Service for Routine Military Training and Transformation of the 2nd Brigade 25th Infantry Division (Light), U.S. Army Installations, Island of Oahu* issued by USFWS states conservation measures must be executed by the Army to off-set adverse training impacts (USFWS, 2003). Such measures include, but are not limited to, control of rodents, actions to minimize the destruction and degradation of forest structure, and ungulate removal. Additionally, the Army actively manages the spread of invasive species through prevention and interdiction, early detection and rapid response, and ongoing control or eradication. This includes control of *Chromolaena odorata* (devil weed), which has been observed within KTA. In 2021, Army Natural Resources Program O'ahu staff worked to clear *C. odorata* from approximately 470 acres in 52 areas (ANRPO, 2021). In addition to previously listed management actions, the Army developed management units, which are defined areas, typically fenced, containing protected and native species habitat managed to control or remove ungulates and other threats, and to facilitate species recovery and habitat protection.

Species with the potential to occur on State-owned land at KTA include 136 plants and 53 wildlife species; of these species, 24 are protected, with no species documented on Tract A-1 and 1 protected plant species documented on Tract A-3. There is no designated critical habitat at KTA. Species with the potential to occur on Poamoho include 114 plants and 53 wildlife species; of these species, 60 are protected, with 27 species documented on Poamoho. There are three designated critical habitats on or adjacent Poamoho. There are 4,349 acres of O'ahu 'elepaio designated critical habitat across both the Poamoho and Proposed NAR Tracts and an additional 75 acres of O'ahu 'elepaio designated critical habitat occur within the 100-foot ROI buffer outside the current State-owned land boundary for a potential total of 4,424 acres of O'ahu 'elepaio critical habitat. This 100-foot buffer also extends an additional 18.6 acres east of the Proposed NAR Tract into the Wet Cliff Unit 8 critical habitat, which includes critical habitat for plants, *Megalagrion leptodemas* (crimson damselfly), and for *Megalagrion oceanicum* (Oceanic Hawaiian damselfly) (USFWS, 2022a). Neither damselfly taxa has been documented on either the Poamoho or Proposed NAR Tracts. Species with the potential to occur on State-owned land at MMR include 102 plants and 30 wildlife species; of these species, 14 are protected. There have been no documented protected species on the Makai or Center Tracts, and there have been 12 species documented on the North Ridge and South Ridge Tracts. There is a total of 970 acres of O'ahu 'elepaio designated critical habitat including

the 100-foot buffer around the State-owned land on MMR (USAG-HI, 2010b; DLNR, 2015a; DLNR, 2021c; USFWS, 2022a).

The distribution of vegetation, invasive and noxious weeds, native species, and protected species within the O'ahu training areas is described in **Section 3.3** and in **Tables 1** through **13** in **Appendix H**.

Wildfire poses a significant threat to the sensitive ecosystems, cultural sites, and quality and flexibility of military training. Per the *Army Wildland Fire Policy Guidance Memorandum* dated September 4, 2002, and AR 200-1, *Environmental Protection and Enhancement*, the Army implements and adheres to an *Integrated Wildland Fire Management Plan* that provides wildland fire management and operational protocols to meet land management goals and objectives. Within the *Integrated Wildland Fire Management Plan*, protection of the local environment and biological resources is considered in fire management strategies and fire suppression activities.

An NAR of approximately 1,230 acres on the eastern portion of Poamoho was proposed by the DLNR. While the proposal has been approved internally within the DLNR, the area has not been officially designated an NAR by the Governor of Hawai'i. Impacts of the Proposed Action on resources within the proposed NAR are analyzed in **Section 3.3**.

CULTURAL AND HISTORIC RESOURCES AND CULTURAL PRACTICES

Commenters

Abbi Abshire

Melodie Aduja, Environmental Caucus of the Democratic Party of Hawai'i

Noelani Ahia

William Aila, Jr., Hui Malama 'O Makua

Jim Albertini, Malu 'Aina Center For Non-violent Education & Action

Raed Alsemari

Leilani Antone

Yuuko Arikawa-Cross

Aida Ashouri

Carley Atkins

Bronson Azama

Adnan B.

Lauren Ballesteros-Watanabe

Chelsea Barbee

Halani Berard

Lauren Harmony Blissett

Jonah Bobilin

Henry Boothe

Celina Brown

Puanani Brown

Madison Brown

Karly Burch

Mauna Burgess

Czeska Cabuhat

Amy Cameron

Kenji Cataldo

Carl Christensen

Mary Clapp

Kanoa Cleveland

Kelsey Cohen

T.J. Cuaresma

Makanamakamaeonalani DaMate

Mara Davis

Ashley De Coligny

Keoni DeFranco

Sierra Dew

Tiana Dole

Malia Evans

Kiersten Faulkner, Historic Hawaii Foundation

Sasha Fernandes

Senator Kurt Fevella, State of Hawai'i District 19

Jonathan Fisk

Chris Foster

Lesley Gabrielle

Jonathan Galka

Representative Cedric Gates, House District 44/45

Sergi Gimenez

Makanalani Gomes

Lisa Grandinetti
Tina Grandinetti
Dee Green
Tyler Greenhill
Cameron Grimm
Christina Hang
David Henkin, Earthjustice on behalf of Malama Makua
Shannon Hennessey
Douglas High
Tai Hino
Pomai Hoapili
Rebecca Hogue
Charlene Holani
Renee Hoomanawanui
Angela Huntemer-Sidrane
Sam Ikehara
Kalani Kaanaana
Iokepa Kaeo
Kyle Kajihiro
Kawena'ulaokalā Kapahua
Aaron Katzeman
Katherine Kealoha
Kara Kelai
Gwen Kim
Miya King
Melanie Lander
Kawena Lauriano
Ara Laylo
Oriana Leao
Tom Lechanko, Aha Ula Puuhonua Kukaniloko
Claudia Leung
Nikos Leverenz
Kauwila M.
Uahikea Maile
Rebecca Mattos
Sorcha McCarrey
Douglas McCracken
Kalia Medeiros
Meleanna Meyer
Yuri Miyabara-Treschuk
Mariana Monasi
Summer Kaimalia Mullens Ibrahim
Makana Nalehua
Jarika Naputo
Luke Nemy
Jacob Noa
Amy O.
Lysandra Padeken
Aleka Pahinui
Amy Parsons
Lee Peele
Barbara Pope
Deborah Pope
Shelly Preza
Pumehana Puaoi-Perry
India Pyzel
Jordan Ragasa
Ikaika Ramones
Andy Rivers
Tara Rojas
Kawai Santiago
Taylor Saunders
Kristi-Ann Say
Keith Scott
Sheela Sharma
Senator Maile Shimabukuro, Senate District 21
Thomas T. Shirai Jr.
Joseph K. Simpliciano Jr.
Samantha Snively
'Ilikea Snow
Mariette Strauss
Alisha Summers
Drew Tanda
Michael Tom
Emily Townley
Grace Tsubaki-Noguchi
Annette Mehana Unten
Ashlee Valeros
Brandon Valeros
Anna van Dorsten
Christina Vien
Viana Villasenor
Nicole Vise
Karen Vitulano, US EPA, Region IX
Purdyka Wahilani
Amanda Wilmsen
Anastacia Wolfgramm-Pineda
Troy Wong
Colonel Ann Wright, Veterans For Peace, Chapter 113-Hawai'i
Eric Yamamoto
Kristen Young
Ku'uleikuponookealoha (no last name provided)
Native Hawaiian Chamber of Commerce
Unidentified Caller #10

During the scoping period, comments received related to archaeological resources address four primary issues, including the presence of known archaeological sites within the State-owned lands at KTA, Poamoho, and MMR; assessing past and future negative impacts of military training; the Army's management of archaeological resources and failure to conduct adequate cultural studies; and maintaining compliance with State and Federal historic preservation law.

Several comments emphasized the presence of archaeological resources within the training areas. The EIS presents a thorough review of baseline cultural resources conditions, including an inventory of identified archaeological and historic architectural properties, summaries of previous archaeological studies conducted within State-owned lands, and an overview of the significance of the ROI to Native Hawaiians. This information is generated from previous archaeological surveys and other cultural resource management studies. The EIS also contains a summary discussion of the Army's progress toward identifying new sites within the training areas. To date, 11 studies have been conducted within State-owned land at MMR, two studies have been conducted within State-owned land at KTA, and no studies have been conducted within the State-owned land at Poamoho (see **Section 3.4** of the EIS).

Commenters also highlighted the need for an assessment of significant impacts on archaeological resources. Impacts on these resources are addressed in **Section 3.4**. The Proposed Action is a real estate action (i.e., retention of the State-owned lands). It does not include proposed changes to the current levels, types, and tempo of training or other activities conducted within the State-owned lands.

The analysis for the retention of State-owned lands adheres to all relevant historic preservation laws, including Section 106 of the National Historic Preservation Act, and Hawai'i Revised Statues Chapter 6E. Existing Programmatic Agreements (PAs) are in place for KTA and Poamoho (USAG-HI, 2018a) and the Ukanipō Heiau site within MMR (USAG-HI, 2000). One comment suggests that the EIS should discuss the provisions of the two PAs, including any stipulations that would be tied to the proposed new lease and future management, and should also address the lack of a historic preservation treatment plan for MMR, how that will be resolved, and how it would be incorporated into any future land retention estate.

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

This process was clarified by the Act 50, Session Laws of Hawai'i 2000, which recognizes the importance of protecting Native Hawaiian cultural resources and requires that an EIS include the disclosure of the effects of a proposed action on the cultural practices of the community and State, and the Native Hawaiian community in particular. Specifically, CIAs should include information relating to practices and beliefs of a particular cultural or ethnic group or groups. Such information may be obtained through public scoping, community meetings, ethnographic interviews, and oral histories. The EIS highlights the process undertaken to prepare a CIA for the three non-contiguous areas of KTA, Poamoho, and MMR. The State-owned lands serve as the study areas, but the boundaries of KTA, Poamoho, and MMR serve as the larger

geographic extents of the study area. Where cultural resources are related to other places and activities outside the geographic extent, these impacts are considered.

The CIA presents information about the State-owned lands, Federal lands, and cultural landscape in the project area. It fills gaps in data from previous studies by identifying place names and cultural resources found in English and Hawaiian language resources. The information serves as a baseline from which cultural resources and traditional practices were identified. Numerous historic maps previously excluded from past studies are included in the CIA. Appropriate information concerning the related ahupua'a was collected, focused on areas near or adjacent to the project area, and an analysis of the project's potential impacts on cultural resources and traditional practices (including access rights) was conducted. Comments related to these issues are addressed in the analysis framework of the CIA. Summaries of interviews are included in the CIA. The CIA includes interviews with people who self-identified as being familiar with the project area.

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

The EIS provides an overview of land tenure in Hawai'i in **Section 3.2**, but does not address land ownership history because that is not relevant to land retention decisions as part of the Proposed Action.

HAZARDOUS SUBSTANCES AND WASTES

Commenters

Abbi Abshire

Melodie Aduja, Environmental Caucus of the Democratic Party of Hawai'i

Noelani Ahia

Jim Albertini, Malu 'Aina Center For Non-violent Education & Action

Carrie Alford

Joseph Anderson

Leilani Antone

Aida Ashouri

Carley Atkins

Adnan B.

Lauren Ballesteros-Watanabe

Chelsea Barbee

Lauren Blissett

Jonah Bobilin

Madison Brown

Karly Burch

Cheryl Burghardt

Czeska Cabuhat

Amy Cameron

Kenji Cataldo

Mary Clapp

Valerie Crabbe

Makanamakamaeonalani DaMate

Mara Davis

Ashley De Coligny

Keoni DeFranco

Noelani DeVincent

Sierra Dew

Tiana Dole

Jessica dos Santos

Joy Enomoto, Women's Voices Women Speak

Malia Evans

Sasha Fernandes

Jonathan Fisk

Chris Foster
Lesley Gabrielle
Sergi Gimenez
Jhiana Gomes
Makanalani Gomes
Lisa Grandinetti
Tina Grandinetti
Dee Green
Tyler Greenhill
Bob Gregory
Cameron Grimm
Carolyn Hadfield
David Henkin, Earthjustice on behalf of Malama Makua
Shannon Hennessey
Tai Hino
Pomai Hoapili
Rebecca Hogue
Chandler Holland, Red Ridge, NC
Renee Hoomanawanui
Angela Huntemer-Sidrane
Tom Iwanicki
Kalani Kaanaana
Iokepa Kaeo
Ron Ka-ipo
Kyle Kajihiro
Kawena'ulaokalā Kapahua
Aaron Katzeman
Kara Kelai
Gwen Kim
Miya King
Melanie Lander
Ara Laylo
Claudia Leung
Sven Lindstrom, Hawai'i DOH HEER Office
Uahikea Maile
Taylor Marsh, Native Ecosystem Services
Rebecca Mattos
Sorcha McCarrey
Douglas McCracken
Kahoiwai McGee
Meleanna Meyer
Yuri Miyabara-Treschuk
Rita Miyamoto
Mariana Monasi
Summer Kaimalia Mullens Ibrahim
Jarika Naputo
Luke Nemy
Jacob Noa
Amy O.
Shannon Lokelani Oberle
Lysandra Padeken
Aleka Pahinui
Amy Parsons
Marisa Plemer
Barbara Pope
Deborah Pope
Shelly Preza
Pumehana Puaoi-Perry
Jordan Ragasa
Ikaika Ramones
Michael Reimer, Ph.D.
Andy Rivers
Kawai Santiago
Taylor Saunders
Allison Shiyozaki
Joseph K. Simpliciano Jr.
Samantha Snively
'Ilikea Snow
Mariette Strauss
Alisha Summers
John Tittle
Tlaloc Tokuda
Michael Tom
Grace Tsubaki-Noguchi
Annette Mehana Unten
Ashlee Valeros
Brandon Valeros
Christina Vien
Viana Villasenor
Karen Vitulano, US EPA, Region IX
Anastacia Wolfgramm-Pineda
Troy Wong
Aree Worawongwasu
Kristen Young
Nathan Yuen
Shuochen Zheng
Hanalei (no last name provided)
Jim (no last name provided)
Unidentified Caller #11

Concerns were expressed pertaining to hazardous substances and wastes about cleanup of the sites after the Army departs, requests for investigations into military debris and pollutants, munitions constituents (MCs) in water and soils, and unexploded ordnance (UXO). References were made to both Red Hill fuel storage and Kaho'olawe cleanup in these comments.

The Army adheres to Federal requirements to address potential spills and releases, including the Installation Restoration Program, Underground Storage Tank/Aboveground Storage Tank Inspection Program, and the Spill Prevention Control and Countermeasure (SPCC) Plan/National Pollution Discharge Elimination System (NPDES). If spills occur at KTA, Poamoho, or MMR, the extent of the spill is investigated, characterized, and remediated in compliance with regulatory requirements, thus minimizing potential environmental impacts.

The Army is committed to environmental stewardship in all actions as an integral part of sustaining the Army mission through compliance with applicable Federal, State, and local regulations and guidelines and implementation of the Integrated Training Area Management (ITAM) Program. The Army has been working with and continues to work closely with the National Response Center and the State of Hawai'i Department of Health (DOH) to identify soil and surface water contamination. The Army will continue this collaborative effort to ensure the protection of human health and the environment.

Since 1977, the Army has conducted several environmental investigations to evaluate chemicals of concern associated with military training at MMR. Groundwater sampling was conducted as part of hydrogeologic investigations from 2002 to 2008. In 2009, the Army implemented a Long-Term Monitoring (LTM) Program to investigate the potential off-site migration of contamination from training areas within MMR to the nearshore Mākua and muliwai (estuary) areas. The MMR LTM Program is focused on MC (e.g., energetic compounds, metals) commonly leached from munitions. When appropriate, the monitoring results were used to identify and implement best management practices (BMPs) to minimize impacts. The most likely pathways for contaminant migration are surface water runoff during significant rainfall events and groundwater flow from the inland areas of MMR to the Pacific Ocean. The LTM Program assesses these pathways through the collection of samples from groundwater monitoring wells and automated surface water samplers installed within MMR. The groundwater monitoring well locations were placed to capture representative samples from groundwater flowing from the Wai'anae Mountain Range to the Pacific Ocean. The LTM Program promotes the Army's policy of being a good steward of the community and continues through the present day.

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

There is no evidence that the Davy Crocket weapon system and associated spotting rounds or other weapon systems containing depleted uranium (DU) were fired at KTA, Poamoho, or MMR. Soil samples collected from areas where sediments accumulated from past runoff/erosion events around the perimeter of MMR were analyzed for isotopic uranium by alpha spectrometry in 2007, as part of DU investigations and field surveys, but showed no indication of DU (HQDA, 2008b). Therefore, DU does not represent a human health and safety concern on or near the training areas. Additional information regarding DU and potential health and safety risks associated with DU is presented in the EIS.

It is possible that MEC, which consists of UXO, discarded military munitions, and MCs, is present on State-owned lands, primarily within the North Ridge, Center, and South Ridge Tracts at MMR (USACE-POH & USAG-HI, 2017b). Large quantities of MEC have been collected at MMR during past UXO sweeps, and

additional MEC is occasionally encountered during training events. The Army has conducted several studies and determined that MCs associated with source areas at MMR are not expected to migrate off the range at levels that would pose an unacceptable risk to human or ecological receptors. None of the MCs found in soil were detected at concentrations greater than USEPA Region 9 industrial soil regional screening levels (RSLs). RSLs are risk-based concentrations for the Superfund/RCRA programs. They are used for site screening and as initial cleanup goals, if applicable. RSLs are used to help identify areas, contaminants, and conditions that do not require further Federal attention at a particular site. Generally, at sites where contaminant concentrations fall below RSLs, no further action or study is warranted.

The remaining State-owned land at MMR is within the Makai Tract, which was used in the past as an amphibious landing site with occasional small arms ammunition and military munitions use. Because the Army has performed surface and subsurface clearance of UXO and discarded military munitions to reduce the risk of encounters with MEC, this area does not require authorization for access. Soil sampling in this area has identified MCs, but not at concentrations greater than USEPA Region 9 industrial soil RSLs (USACE-POH & USAG-HI, 2017b). The Army monitors the potential for offsite migration of substances associated with MCs at MMR. Areas that contain or are likely to contain MEC are strictly monitored by the Army and are not accessible by the public. Guidance and procedures for the remediation of MEC at active Army installations and Formerly Used Defense Sites are located in the *DoD Ammunition and Explosives Safety Standards* (DoD 6055.9E, 2019).

Detailed information regarding hazardous substances and wastes, including DU and MEC, is provided in **Section 3.6** of the EIS.

Following lease expiration and in accordance with the lease, or as otherwise negotiated with the State, the Army would conduct lease compliance actions. The parameters for compliance with the lease conditions for the State-owned land not retained would be defined and determined after completion of this EIS.

Air Quality and Greenhouse Gases

Commenters

Melodie Aduja, Environmental Caucus of the Democratic Party of Hawai'i

Mary Tuti Baker

Jeanne Ishikawa, Wahiawā-Whitmore Village Neighborhood Board No. 26

Kyle Kajihiro

Sorcha McCarrey

Koohan Paik-Mander

Lisa Wallace, Hawai'i DOH, Clean Air Branch

Joe Wilson

Seiji Yamada

During the scoping period, comments received related to air quality and/or climate change primarily discuss the air emissions stemming from the Proposed Action and Alternatives, concerns with GHG emissions and climate change, and concerns with DU. Many of the concerns associated with climate change are also addressed by responses to comments regarding biological resources, and many of the concerns associated with DU are also addressed by responses to comments regarding hazardous materials and wastes.

Air emissions at KTA, Poamoho, and MMR are not enumerated due to a lack of stationary emission sources on the training areas. Sources of air emissions associated with the State-owned lands at KTA, Poamoho, and MMR include exhaust from military vehicles and aircraft flight operations, dust from vehicle use on

gravel and dirt roads and near-ground helicopter operations, military munitions use, prescribed burning, and the open burning of propellants. Prescribed burns are pre-approved by the DOH Clean Air Branch and are conducted in accordance with requirements included in permits and HAR Section 11-60.1-52. Open burning of materials can also be approved when no alternate disposal methods are available. The burning of accumulated excess propellants from various weapons systems at MMR has been approved by the DOH Clean Air Branch through April 2024 due to the minimal effect on air quality when restrictions outlined in the approval letter are followed. **Section 3.7** of the EIS addresses the impacts from air emissions under each alternative considered at each training area.

HAR Section 11-60.1-33 states that fugitive dust must not be generated without taking reasonable precautions. Actions taken by the Army to minimize fugitive dust emissions during training activities include road maintenance, mechanical stabilization, and the use of chemical dust suppressants (palliatives). While the predominant sources of fugitive dust emissions are maneuver activities on unpaved roads and trails, rotor downwash from helicopter activities have been identified as a lesser source. The Army implements restrictions on helicopters hovering and rotowash if soil and atmospheric conditions indicate that excessive dust generation would occur.

The air quality analysis in the EIS is being completed in accordance with EO 13990, *Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis*, the Army's March 4, 2021 memorandum titled *Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in Army National Environmental Policy Act Reviews*, and the Council on Environmental Quality's January 2023 interim guidance titled *Final National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change*. **Section 3.7** addresses direct and indirect GHG emissions from the Proposed Action and the impacts of ongoing climate change. Because the Proposed Action is a real estate action, a full life-cycle analysis of GHG emissions from non-scope considerations such as manufacturing and shipping of equipment and materiel, and troop movements to and from KTA, Poamoho, and MMR is beyond the scope of the EIS.

The Army used the Davy Crocket weapon system on range M79 within the Main Post area of Schofield Barracks (southwest of Poamoho) from 1962 to 1968. The system used a 20-millimeter spotting round (M101) to show where the weapon system was aimed. The body of the spotting round was made of a DU alloy. The decay and vaporization of DU fragments can impact local air quality. Poamoho is outside of the DU impact area. All of MMR was considered a potential DU impact area, and 10 soil samples were collected along the MMR range roads in 2007 to determine if DU was present. Analysis of these samples showed no indication of DU because results were consistent with naturally occurring uranium concentrations and isotope ratios found in Hawaiian soils and rock. Additional aerial surveys of MMR in 2008 found no evidence that the Davy Crocket weapon system was used.

NOISE

Commenters

Melodie Aduja, Environmental Caucus of the Democratic Party of Hawai'i
Chloe Allen
Chloe Amos
Diane Anderson
Rachel Arasato
Andrea Barnes
Lauren Harmony Blissett
Celina Brown
Cheryl Burghardt
Lynell DaMate
Sheila Gage

Tina Grandinetti
Erica K.
Kyle Kajihiro
Michael Kirk-Kuwaye
Taylor Marsh, Native Ecosystem Services
Kane Kumu Honua Kama-kapu Mo'i Kamehameha, Sovereign Kamehameha Dynasty Government
Shelley Muneoka, KAHEA: The Hawaiian Environmental Alliance
Zack Murphy
Bruce Nakano
Jacob Noa
Kathleen M. Pahinui
Aleka Pahinui
Healohaokawailani Pascua
Heidi Pihana
India Pyzel
Jordan Ragasa
Ikaika Ramones
Rachel Reamsbottom
Mark Robinson
Darlene Rodrigues
Michael Sarmiento
Kristi-Ann Say
Alexandria Seger
Keolakawai Spencer Shimabukuro
Karen Vitulano, US EPA, Region IX
Kalyn Wadsworth
Richard Whyte
Joe Wilson
Chandler (no last name provided)

Scoping comments received regarding noise impacts were centered on the Army's operations on surrounding areas and people recreating near the training areas with State-owned lands, primarily noise associated with military ammunition, helicopters, and other aircraft. Comments stated that notification and engagement had ceased over the years. USEPA requested that the *Guidance for Helicopter for Community Noise Prediction* document be used to detail impacts on wildlife.

The Proposed Action is a real estate action (retention of the State-owned lands) and does not include construction, changes to ongoing activities conducted within the State-owned land retained, or changes to use of the local airports, roadways, and harbors. The Proposed Action would result in the same training and resulting noise from existing KTA, Poamoho, and MMR.

The Army produces a monthly schedule of upcoming training activities involving actions that may be heard outside the training areas. As only one of many agencies using the airspace over O'ahu, the schedule is not inclusive of all aviation activities for all military services. The USAG-HI PAO shares this notice with media, elected officials, and local neighborhood boards using email, social media, and the USAG-HI website. Community members can opt in to receive the notifications directly by emailing usag.hawaii.comrel@army.mil with "Subscribe Training" in the subject line.

There are a variety of entry points for the public to voice noise concerns related to the Army's training activities. Concerns are taken via the Army Hawai'i's Noise Concern Line at (808) 656-3487 or the email address provided in the previous paragraph. USAG-HI PAO processes the concerns in coordination with the Army's 25th Infantry Division, who researches and follows up with the public. Concerns are responded to during regular business hours. The Army operates only helicopters and unmanned aerial systems, commonly known as drones. Airplanes or "fixed wing aircraft" are flown by other military services.

The Army acknowledges the jurisdiction and responsibilities of the State. Additional information, including a summary of existing conditions and analysis of potential impacts from the Proposed Action and alternatives, is provided in **Section 3.8**.

GEOLOGY, TOPOGRAPHY, AND SOILS

Commenters

Melodie Aduja, Environmental Caucus of the Democratic Party of Hawai'i
Rachel Arasato
Puanani Brown
Sergi Gimenez
Angela Huntemer-Sidrane
Kyle Kajihiro
Russell Leong
Shuochen Zheng

Comments expressed concerns regarding contamination of soils from MC, impacts on soils and topography from natural disasters, and impacts on beaches. The Army has built and maintains partnerships with more than 30 local, State, and Federal offices, agencies, and schools and complies with applicable Federal, State, and local regulations and guidelines in an effort to protect the environment and preserve Hawai'i's natural resources. The Sikes Act Improvement Act, as amended through 2003 (Public Law 108-136), requires the preparation, implementation, update, and review of an INRMP for each military installation in the United States with significant natural resources, and is prepared in cooperation with the USWFS and the DLNR. The INRMP ensures the maintenance of quality training land, thereby supporting USAG-HI in accomplishing its critical military missions. The Army is committed to environmental stewardship in all actions as an integral part of sustaining the Army mission through the implementation of the ITAM Program.

KTA (Tracts A-1 and A-3)

KTA is in the northeastern and windward region of the Ko'olau Mountains on a remnant of an eroded shield volcano from the Pleistocene era (1.3 to 2.2 million years ago). Much of the original lava surfaces of the shield volcano remain intact along the Kahuku escarpment, along drainages, and in the outcrops of upland areas. The coastal plains at KTA form on limestone cliffs uplifted from reefs and are covered by calcareous beach sands and sediments eroded from the volcano.

The erosion risk at KTA is locally important in areas where natural drainages and gulches occur. Soil erosion by water within the State-owned land at KTA can be locally substantial. A relatively dry climate and lack of permanent streambeds appear to moderate the risk of erosion, as do areas where soils are not well developed because of exposed rock. The dense vegetation covering the slopes slows runoff and allows more rainfall to infiltrate instead of discharging directly to streams.

All training at KTA, including State-owned land, adheres to procedures, requirements, and management measures outlined in USARHAW Regulation 350-19; AR 350-19; Dust and Soils Management and Monitoring Plan; Erosion Control BMPs Program Plan; INRMP; SPCC Plan; Storm Water Management Plan (SWMP); Standing Operating Procedures (SOPs) for KTA; and the 1964 lease for the State-owned land at KTA. These regulations and procedures ensure the minimization of impacts on geological and soil resources during training activities.

Poamoho (Poamoho Tract and Proposed NAR Tract)

Poamoho is located on the Schofield Plateau on the western slopes of the Ko'olau Mountains, a remnant of an eroded shield volcano from the Pleistocene era, 1.3 to 2.2 million years ago. The area has limited access and is used primarily by the military for aviation training, including low-altitude technical

operations. No Army improvements have been made to this area. This site is characterized by dense vegetation and rugged mountainous terrain. The parent material for the rough mountainous land is alluvium and colluvium with paralithic bedrock at 20 to 40 inches. A thin and fine-textured soil mantle of 1 to 10 inches over saprolite is common in this area. Erosion risk within the State-owned land at Poamoho is locally substantial in areas depending on the amount of slope. Erosion associated with ground-based training at Poamoho is not recent because ground-based training has not occurred within the last decade.

Training at Poamoho, which currently consists of aviation activities, adheres to procedures, requirements, and management measures outlined in USARHAW Regulation 350-19*;* AR 350-19; Erosion Control BMPs Program Plan; INRMP; SPCC Plan; SWMP; SOPs for Poamoho; and the 1964 leases for the State-owned land. These regulations and procedures ensure the minimization of impacts on geological and soil resources during aviation training activities such as from rotowash. In addition, Poamoho is located within the DLNR 'Ewa Forest Reserve (Poamoho section), a State Forest Reserve.

MMR (Makai Tract, North Ridge Tract, Center Tract, and South Ridge Tract)

MMR is located within two valleys on the northwest side of the Wai'anae Mountains. The North Ridge Tract is within Kahanahāiki Valley, the Center Tract straddles Kahanahāiki and Mākua Valleys, and the South Ridge Tract is within Mākua Valley. The ridges and underlying bedrock of Mākua Valley consist of Wai'anae Volcanic basalt rocks. The older part of this sequence, the Pālehua member of the Wai'anae Volcanic series, is exposed in the lower part of the ridge that forms the southern boundary of the valley and probably underlies the valley floor. The higher ridges are formed by the Kamaile'unu and/or Lualualei members of the Wai'anae Volcanics. The valley floor is underlain by Quaternary (less than 1.8 million years old) alluvial deposits of unknown thickness. Near the coast, the surficial deposits consist of beach dune sands underlain by calcareous cemented sands and rubble and the remnants of an emerged ancient reef. The calcareous cemented sands and rubble are the remnants of an emerged ancient reef. A complex mixture of soils occurs in Mākua Valley resulting from the many microenvironments and variations in slope. Erosion risk within the State-owned land at MMR is variable and dependent on the natural topography and drainages. Most drainages generally flow east to west, and stormwater runoff from upland forests typically runs mauka (from the mountain surrounding MMR) to makai (toward the ocean). Runoff from MMR is either retained on-site or collected in a roadside swale along Farrington Highway. The swale discharges to two box culverts that cross beneath the highway and outlet to low areas between beach dunes to the west of Farrington Highway. A dry climate and lack of permanent streambeds appear to moderate the risk of erosion. To reduce erosion rates, range roads have been improved with crushed coral, and grassy vegetation cover in the valley has increased.

Training at MMR, including State-owned land, adheres to procedures, requirements, and management measures outlined in USARHAW Regulation 350-19; Army Regulation 350-19; Dust and Soils Management and Monitoring Plan; Erosion Control BMPs Program Plan; INRMP; Spill Prevention, Control, and Countermeasure Plan; SWMP; SOPs for MMR; and the 1964 lease for the State-owned land. These regulations and procedures ensure the minimization of impacts on geological and soil resources during training activities.

In 2017, Environmental Condition of Property reports were prepared for the State-owned lands within KTA, Poamoho, and MMR. The purpose of the investigations was to evaluate the environmental condition of the properties by examining the current and historical uses of the property and adjoining properties.

The EIS includes a description of geologic conditions within State-owned lands being considered for the continuation of ongoing activities and analyzes the potential impacts of the Proposed Action. More information is provided in **Section 3.9**.

WATER RESOURCES

Commenters

Melodie Aduja, Environmental Caucus of the Democratic Party of Hawai'i
Bronson Azama
Dan Bissell
Lauren Harmony Blissett
Henry Boothe
Puanani Brown
Mary Alice Evans, State of Hawai'i Office of Planning & Sustainable Development
Angela Huntemer-Sidrane
Kyle Kajihiro
Kauwila M.
Shelley Muneoka, KAHEA: The Hawaiian Environmental Alliance
Shannon Lokelani Oberle
Lena Orlando
Jacob Shearer
Joseph K. Simpliciano Jr.
Alisha Summers
Nicole Vise
Native Hawaiian Chamber of Commerce

Water resources-specific comments expressed concerns including contamination of marine life by military MC, impacts on aquifers and the importance of water for agriculture. The Army has built and maintains partnerships with more than 30 local, State, and Federal offices, agencies, and schools; and complies with applicable Federal, State, and local regulations and guidelines in an effort to protect the environment and preserve Hawai'i's natural resources. The Sikes Act Improvement Act, as amended through 2003 (Public Law 108-136), requires the preparation, implementation, update, and review of an INRMP for each military installation in the U.S. with significant natural resources and is prepared in cooperation with USWFS and the Hawai'i DLNR. The INRMP ensures the maintenance of quality training land, thereby supporting USAG-HI in accomplishing its critical military missions. The Army is committed to environmental stewardship in all actions as an integral part of sustaining the Army mission through the implementation of the ITAM Program. The ITAM Program, along with the adoption and use of BMPs for riparian zones and other areas and specific watershed management projects, provides the mechanism for attaining watershed management goals by maintaining the integrity of stream courses, reducing the volume of surface runoff originating from disturbed areas and running directly into surface water; minimizing the movement of pollutants (e.g., nutrients) and sediment to surface and groundwater; and stabilizing exposed mineral soil areas through natural or artificial revegetation means. USAG-HI is a member of the Ko'olau and Wai'anae Mountains Watershed Partnerships, a consortium of landowners and interested parties that have banded together to protect the watershed area.

KTA (Tracts A-1 and A-3)

Streams on the State-owned land include Waiale'e Gulch (intermittent stream), a tributary off of Kaunalā Gulch to the east of the State-owned land, and Paumalū Gulch (perennial stream), which has multiple branches on the State-owned land. Kaleleiki Stream, located on the west side of Tract A-3, is a perennial stream that is a tributary to the Paumalū Stream. All streams and gulches within State-owned land flow aboveground to a certain point before going underground and reaching the ocean. At this time, the Army does not conduct water quality sampling at KTA. A water pump station was constructed by the Hawai'i

Motorsports Association to pump water from the Waiale'e Gulch, an intermittent stream, to control dust; however, the stream is often dry.

Hydrologic units for groundwater and surface water have been defined by DLNR's Commission on Water Resource Management (CWRM) for all islands in the State. KTA overlies the Kawailoa aquifer system in the North groundwater hydrologic unit with a sustainable yield of 29 million gallons per day. There are no drinking water wells within this area. The U.S. Army Engineer District, Honolulu wetland inventory did not identify any wetlands on State-owned land at KTA.

All training at KTA, including on State-owned lands, adheres to procedures and requirements in the Erosion Control BMPs Program Plan, INRMP, IWFMP, SPCC Plan, SWMP, the SOPs for KTA, and the 1964 lease for State-owned land at KTA.

Poamoho (Poamoho Tract and Proposed NAR Tract)

Deep gulches in the Poamoho parcel were created by two perennial streams: the Poamoho Stream, a perennial stream, and the North Fork of Kaukonahua Stream. Multiple other perennial streams also exist at Poamoho. An irrigation ditch system was developed between 1900 and 1910 by Waialua Sugar Company to bring water from Poamoho and Kaukonahua Streams for irrigation of sugarcane and pineapple fields. A portion of the approximately 4-mile Mākua Ditch is located within the State-owned land; the entire system has approximately 8 miles of lateral ditches and 38 tunnels. The Mākua Ditch was constructed to collect Kaukonahua water branches above Wahiawā Reservoir (Lake Wilson) for storage. One tunnel, the Poamoho Tunnel, was developed to move water from the northern part of the Poamoho Stream to the North Fork of Kaukonahua Stream and is partially located within Poamoho. The reservoir water is used for agriculture in the North Shore area of Waialua and Hale'iwa. Topographic maps by the U.S. Geological Survey note tunnels in the Poamoho area; however, it is unclear whether the ditches and tunnels are maintained, and the current condition of the system is unknown.

The Commission of Water Resources Management (CWRM) is the primary steward of water resources and has broad powers and responsibilities to protect and manage Hawai'i's water resources. Hydrologic units for groundwater and surface water have been defined by CWRM for all islands in the State. State-owned land at Poamoho lies in the Wahiawā (western side) and Ko'olau (eastern side) aquifer systems in the Central groundwater hydrologic unit with a sustainable yield of 23 million gallons per day. There are no wells on State-owned land at Poamoho.

Poamoho Pond is one of several features identified as a potential wetland by the U.S. Army Corps of Engineers (USACE) within State-owned land. Poamoho Pond is located near the top of the Ko'olau Mountain Range and is managed by the O'ahu Army Natural Resources Program. This potential wetland has not yet been delineated by USACE, which would be needed to determine its regulatory status.

Training at Poamoho, which is entirely on State-owned land, adheres to procedures and requirements in USARHAW Regulation No. 350-19, *SOP for Kawailoa Training Area*, BMPs, and the 1964 lease. The Army implements restrictions on aircraft hovering and rotowash if soil and atmospheric conditions indicate that excessive dust generation would occur. No other existing management measures apply to water resources in Poamoho because ground training does not currently occur.

MMR (Makai Tract, North Ridge Tract, Center Tract, and South Ridge Tract)

The State-owned land at MMR is located mainly within the Mākua Watershed; the north portion is located within the Kaluakauila Watershed, and the south portion is located within the Kea'au Watershed. The Mākua Watershed includes drainages from the Punapōhaku Stream, Mākua Stream, Kalena Stream, and Kaluakauila Stream. This dry, leeward region does not support any perennial streams, but subsurface flow is present. Two ephemeral streams cross State-owned land at MMR, Punapōhaku Stream, and Kalena Stream, as do one perennial stream, Mākua Stream, and one intermittent stream, Kaluakauila Stream. USFWS NWI maps indicate that all these stream segments contain riverine wetlands.

Runoff from the streams that drain the valley is channeled through box culverts beneath the highway and terminates east of the long ridge of dune sand east of the shoreline of Mākua Beach. Brackish water pools, or muliwai, are often formed near the mouths of streams, created by seasonal barriers of sand or sediment. Three muliwai (estuarine wetlands located adjacent to the ocean) ponds and the Hau Thicket were identified as potential wetlands between Farrington Highway and the ocean. Punapōhaku muliwai was determined to be a regulated wetland, Kalena and Mākua muliwai were determined to be streams, and the Hau Thicket was determined not to be a wetland. Riverine wetlands and possible palustrine wetlands associated with seep areas in the Mākua Stream drainage are avoided through various Army training restrictions. The size and shapes of the muliwai may vary over time, and not all appear to contain water throughout the year.

MMR and State-owned lands lie in the Kea'au aquifer system in the Wai'anae hydrologic unit with a sustainable yield of 16 million gallons per day. Five wells are listed by USGS within State-owned land at MMR. Well 3-3213-06 (drilled in 1965 to a depth of 36 feet), 3-3213-07 (drilled in 1987 to a depth of 80 feet), 3-3213-04 and 3-3213-01 (drilled in 1962 to a depth of 20 feet), and 3-3113-01 (drilled in 1962 to a depth of 30 feet). Due to their close proximity to the shoreline, all of these wells likely have high salinity. No additional information regarding the wells is available. No public drinking water wells are documented within one mile of State-owned land at MMR.

Training at MMR, including State-owned land, adheres to procedures outlined in the Erosion Control BMPs Program Plan, INRMP, IWFMP, SPCC Plan, SWMP, the SOP for MMR, and the 1964 lease for the State-owned land at MMR. The DOH issued a NPDES Permit Number HI S000090 to USAG-HI for discharge associated with MMR industrial activities, which expires on October 31, 2025. All discharges must be in compliance with the Clean Water Act as amended (33 U.S.C. §1251 et seq.), HRS Chapter 342D, HAR Chapters 11-54 and 11-55, and the conditions of the NPDES permit.

Since 1977, the Army has conducted numerous environmental investigations to evaluate chemicals of concern associated with military training at MMR. The hydrogeologic investigation included obtaining samples of surface soils, streambed materials, subsurface soils, water from stream flows, suspended sediment from stream flows, and groundwater and comparing compound levels in these samples to current environmental standards and background levels. The hydrogeologic investigation also included the collection of additional parameters to refine the general hydrologic site conceptual model of the Mākua Valley. With the exception of one metal, thallium, the groundwater in Mākua Valley meets drinking water standards established by USEPA.

From 2010 to the present, the Army has implemented the LTM Program to detect off-site migration of contaminants from training areas and to develop a baseline of groundwater and surface water quality

within MMR to the nearshore Mākua area and muliwai areas. The program is focused on energetic compounds and metals commonly leached from MCs. In the most recent groundwater monitoring event in May 2021, no tested analytes, except for the total metal manganese, were detected at concentrations exceeding their applicable screening levels. There is no enforceable Federal drinking water standard (maximum contaminant level) for manganese. The LTM Program has found that there are very few obvious historical trends in total metals, dissolved metals, energetics, or perchlorate concentrations. Most analytes were not detected, and those that were detected remained stable or declined throughout time within each groundwater monitoring well, with few outliers. Continuation of the LTM Program for groundwater helps in reducing the uncertainty associated with sporadic or anomalous detections, confirm trends, and promotes the Army's policy of being a good steward of the community. Compliance with the Sustainable Range Awareness Program and adherence to the LTM Program provide a decision-support capability that helps to minimize or prevent the introduction of contamination that may impact groundwater quality.

Following lease expiration and in accordance with the lease, or as otherwise negotiated with the State, the Army would conduct lease compliance actions. The parameters for compliance with the lease conditions for the State-owned land not retained would be defined and determined after the completion of this EIS.

More information regarding water resources is provided in **Section 3.10.**

SOCIOECONOMICS

Commenters

Melodie Aduja, Environmental Caucus of the Democratic Party of Hawai'i
Kelsey Amos
Yuuko Arikawa-Cross
Bronson Azama
Mary Tuti Baker
Adele Balderston
Henry Boothe
Adele Bothersten
David Bramlett
Puanani Brown
Meredith Buck
Lindsay Cano
Jason Chung, Military Affairs Council, Chamber of Commerce HI
Emily Conklin
Keoni DeFranco
Kala Diaz
Jessica dos Santos
Malia Duke
Jane Eastwood
Joy Enomoto, Women's Voices Women Speak
Mary Alice Evans, State of Hawai'i Office of Planning & Sustainable Development
Maurie Feldberg
Sarah Francis
Lesley Gabrielle
Tina Grandinetti
Nainoa Heaston
David Henkin, Earthjustice on behalf of Malama Makua
Chandler Holland, Red Ridge, NC
Ivy Hsu
Jameela Huntington
Sam Ikehara
Wally Inglis
Christina Jones
Katie Mae Jones
Nathalie Jones
Kyle Kajihiro
Lahela Kalohi-Arroyo
Chezerie Kapiowainuinui
Alihilani Katoa
CJ Kee
Candice Kirby
Sunnie Kupahu
Kari Leah Labrador
Lu Ann Mahiki Lankford-Faborito, Makaha Hawaiian Civic Club
Kawena Lauriano

Natalie Lindsay
Samantha Maas
Marian Marcigan
Maya Maxym
J. Mahealani McClellan
Nedi McKnight
Laurie Moore
Summer Kaimalia Mullens Ibrahim
Shelley Muneoka, KAHEA: The Hawaiian Environmental Alliance
Linda Muralidharan
Theresa Ng
Kamaka Parker
Moananui Peleiholani-Blankenfeld
Ikaika Pestana
Melinda Polet, Hamakua sacred arts. Fern acres non profit trust
Margaret Primacio
Yvonne Pyle
Abigail Rose
Jack Shriver, Honolulu Council, Navy League of the US
Matthew Swalinkavich
Tanaka (no first name provided)
Danny Wassman
Joe Wilson
Aipohaku (no last name provided)
Koutaro (no last name provided)
Native Hawaiian Chamber of Commerce
Unidentified Caller #7

The comments regarding socioeconomics expressed concerns with housing costs and affordability due to the presence of military personnel living on island and requests for an economic study to analyze the economic impacts from the military presence. Other concerns were noted as to crime, violence cultural differences of residents and the military and displacement of Native Hawaiians.

Socioeconomic characteristics of O'ahu and specific communities are presented in **Section 3.11**. This section provides analysis of demographics, housing, labor force and employment, income, and economic indicators for the City and County of Honolulu and affected communities. As defined by HAR Section 11-200.1-2, the existing conditions includes economic conditions. Pursuant to HAR Section 11-200.1-24(h), the EIS discusses the economic impacts from the continued use of the State-owned land within the training areas, and impacts if the State-owned lands are not retained. The section also discusses the effect of military activity on the local economy, as well as potential socioeconomic and economic impacts of the Proposed Action.

Housing cost trends and affordable housing availability are discussed in **Section 3.11**. Ordinance 18-10 (Establishing an Affordable Housing Requirement) and the associated Rules to Implement the City's Affordable Housing Requirements seek to increase the production of affordable housing, to encourage dispersal of affordable housing options throughout the City and County of Honolulu, and to maintain those units as affordable. Additionally, **Section 3.11** discusses crime trends on O'ahu based on Hawai'i Attorney General Crime Prevention and Justice Assistance Division data and Police Department annual reports.

The land retention estate(s) and method(s) would not be selected until after the Proposed Action has been approved and a ROD has been published. The Army would propose the most appropriate land retention estates and methods based on the selected alternative and through negotiation with the State. Due to the timing of these negotiations, potential land valuation methods and fees associated with the various land retention estates and methods cannot be evaluated in the EIS. The Army has not calculated the costs associated with the lease compliance actions and investigation, removal, and cleanup of hazardous substances and wastes within the State-owned lands. The parameters for lease compliance actions are subject to the terms of the leases and State negotiations, which cannot be initiated until an alternative has been selected and a ROD issued.

ENVIRONMENTAL JUSTICE

Commenters

Abbi Abshire
Noelani Ahia
Jim Albertini, Malu 'Aina Center For Non-violent Education & Action
Carrie Alford
Raed Alsemari
Kelsey Amos
Daniel Anthony
Leilani Antone
Carley Atkins
Adnan B.
Mary Tuti Baker
Lauren Ballesteros-Watanabe
Chelsea Barbee
Lauren Blissett
Jonah Bobilin
Puanani Brown
Madison Brown
Karly Burch
Cheryl Burghardt
Czeska Cabuhat
Amy Cameron
Kenji Cataldo
Mary Clapp
Valerie Crabbe
Makanamakamaeonalani DaMate
Diana Dannoun
Mara Davis
Ashley De Coligny
Keoni DeFranco
Matthew Dekneef
Sierra Dew
Tiana Dole
Jamie Echols
Jordan Elicker
Joy Enomoto, Women's Voices Women Speak
Vanessa Esprecion
Malia Evans
Hank Fergerstrom
Sasha Fernandes
Senator Kurt Fevella, State of Hawai'i District 19
Jonathan Fisk
Chris Foster
Sergi Gimenez
Jhiana Gomes
Lisa Grandinetti
Tina Grandinetti
Dee Green
Tyler Greenhill
Cameron Grimm
Shannon Hennessey
Tai Hino
Pomai Hoapili
Renee Hoomanawanui
Ivy Hsu
Sam Ikehara
Arcelita Imasa, Hawaiian Committee for Human Rights in the Philippines
Khara Jabola-Carolus
Jim-eok Jung
Kalani Kaanaana
Iokepa Kaeo
Kyle Kajihiro
Kaimana Kanekoa
Kawena'ulaokalā Kapahua
'Alihilani Katoa
Aaron Katzeman
Kara Kelai
Darius Kila
Gwen Kim
Miya King
Kari Leah Labrador
Ara Laylo
Tom Lenchanko, Aha Ula Puuhonua Kukaniloko
Claudia Leung
Nikos Leverenz
Meredith Linhart
Kauwila M.
Uahikea Maile
Rebecca Mattos
Sorcha McCarrey
Douglas McCracken
Kalia Medeiros
Meleanna Meyer
Yuri Miyabara-Treschuk
Mariana Monasi
Makana Nalehua
Jarika Naputo
Luke Nemy
Jacob Noa
Kalani Nozaki
Amy O.
Kiana Otsuka
Lysandra Padeken

Aleka Pahinui
Koohan Paik-Mander
U'ilani Perry
Barbara Pope
Deborah Pope
Shelly Preza
Pumehana Puaoi-Perry
India Pyzel
Jordan Ragasa
Ikaika Ramones
Andy Rivers
Anjoli Roy
Kawai Santiago
Taylor Saunders
Alana Siaris
Samantha Snively
'Ilikea Snow
Regan Spencer
Linsey Stokes
Mariette Strauss
Alisha Summers
Carol Titcomb
Michael Tom
Emily Townley
Grace Tsubaki-Noguchi
Annette Mehana Unten
Ashlee Valeros
Brandon Valeros
Anna van Dorsten
Christina Vien
Viana Villasenor
Emma Villemarette
Karen Vitulano, US EPA, Region IX
Purdyka Wahilani
John Witeck
Anastacia Wolfgramm-Pineda
Troy Wong
Aree Worawongwasu
Kristen Young
Aipohaku (no last name provided)

Concerns associated with perceptions of some Native Hawaiians and the current social climate regarding military use of Hawaiian lands are discussed in **Section 3.12** of the EIS. These general concerns were raised by over 130 commenters. Concerns by commenters included a need to solicit input from community organizations of how these lands may be essential to missions and visions (meaningful engagement), protected person status under international law, and fair treatment on indigenous lands. Environmental justice concerns also included the terms of the original 1964 leases and the perceived inequities associated with the original leases. **Section 3.12** also discusses how a more equitable exchange could provide value to the Hawaiian people, such as via fair market value compensation, land exchanges, and funding for Native Hawaiian community benefits.

USEPA defines environmental justice as "the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies." It goes on to clarify that "no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental, and commercial operations or policies" (USEPA, 2022). A 1996 USEPA memorandum on evaluating health risks to children states, "In these cases where there may be an impact on children you should specifically address the question (of whether there are potential disproportionate impacts on children) even if it turns out that effects (on children) are not significant. However, if it is reasonably clear from the nature of the Proposed Action that there will be no disproportionate impact, there is no reason to require any discussion" (USEPA, 1996).

Additionally, there are two EOs that address both environmental justice and protection of children. EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,* directs Federal agencies to identify and address the disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations. EO 13045, *Protection of Children from Environmental Health Risks and Safety Risks,* specifically indicates that analysis should consider environmental risks to health or safety that are attributable to products or substances that children are likely to come into contact with or ingest.

The environmental justice analysis focuses on whether there would be impacts on the natural or physical environment (as indicated in the respective resource sections) that would result in disproportionately high and adverse impacts on low-income, minority, and Native Hawaiian populations. Geographic information system mapping is used to identify areas that are considered low-income, minority, or Native Hawaiian population areas.

To determine whether there would be disproportionately high and adverse impacts on environmental justice populations, analysis from each resource area is considered. Generally, if a resource area analysis indicates that the Proposed Action would have no impact or a less than significant impact, the Proposed Action is unlikely to have an adverse impact on environmental justice populations. If a resource area analysis indicates that there would be a significant impact that would, broadly interpreted, harm the health, safety, well-being, or culture of environmental justice populations, then that is considered an adverse impact and determined to be a significant impact related to environmental justice.

TRANSPORTATION AND TRAFFIC

Commenters

Melodie Aduja, Environmental Caucus of the Democratic Party of Hawai'i
Jade Butay
Amber Herzog Lyman
Kyle Kajihiro
Roberts Leinau
Shelley Muneoka, KAHEA: The Hawaiian Environmental Alliance
Kathleen M. Pahinui
Patrick Watson
Joe Wilson

A few comments received on transportation were related to traffic on the North Shore. The Proposed Action involves no changes to ongoing activities conducted within the State-owned lands retained and no changes to use of the local roadways, airports, and harbors. The Proposed Action alternatives vary from full retention to no retention of the State-owned lands, which would result in the same or less use of existing KTA, Poamoho, and MMR and the local and regional roadway system that includes interstate freeways to neighborhood streets. The roadway system is maintained by the Hawai'i Department of Transportation and the City and County of Honolulu's Department of Facility Maintenance. Interstate freeways on O'ahu are grade-separated and access-controlled and include H1 between Kapolei and Kahala, H2 between Wahiawā and H1, H3 between Halawa and Kaneohe Marine Corps Base Hawaii, and Moanalua Freeway (H201) connecting H1. These freeways, plus Kamehameha Highway and Farrington Highway, provide connections between the O'ahu training areas. Wheeler Army Airfield and Joint Base Pearl Harbor-Hickam support Army troop and equipment deployment by air and sea overland to and from the training areas. Units are transported by a combination of vehicles, sea transport vessels, and aircraft depending on the type and location of training. The Army publishes media releases to local newspapers, radio stations, and online (via the USAG-HI website) to provide advanced notice of upcoming convoys and training activities occurring at KTA, Poamoho, and MMR. The USAG-HI PAO also provides routine community updates and FLASH alerts regarding trainings and convoys via email (upon request).

The Army acknowledges the jurisdiction and responsibilities of the Hawai'i Department of Transportation, Statewide Transportation Planning Office. **Section 3.13** of the EIS summarizes the results of a qualitative traffic analysis of the Proposed Action addressing Army-related vehicular use on existing transportation infrastructure, including the effects on bicycle/pedestrian use along roadways, peak hour traffic volumes, public safety, and access by emergency response agencies.

AIRSPACE

Commenters

Melodie Aduja, Environmental Caucus of the Democratic Party of Hawai'i	Mark Robinson Joe Wilson

Comments received expressed concerns with airspace and specifically noise generated military helicopters. Military aircraft in Hawai'i comply with all Federal Aviation Administration (FAA) guidelines and requirements to ensure safe airspace usage, minimize airspace usage conflicts, and comply with all established flight routes and noise abatement procedures. In addition to FAA guidelines and requirements, Army airspace operations are subject to AR 95-1, *Flight Regulations*, which includes airspace usage, safety, and noise abatement procedures. To abate noise impacts on residential areas, Army pilots are trained to avoid unnecessary flights over populated areas and to avoid all residences, including those in very sparsely populated areas as outlined in the *Installation Compatible Use Zone Study* (USAG-HI, 2017d). Further information regarding aircraft-related noise and safety is included in **Section 3.14**.

Military aircraft flying over KTA and Poamoho are permitted to use the Wheeler Army Airfield Alert Area 311 airspace, which extends from the ground surface up to an altitude of 500 feet above ground level (AGL) from 0700 to 2300 hours, and allows for low-altitude military helicopter training. Military aircraft flying over MMR train within the following restricted airspaces:

- R-3110 A, which extends from the ground surface up to, but not including, 9,000 feet AGL directly above MMR
- R-3110 B, which extends from 9,000 feet AGL up to, but not including, 19,000 feet AGL above MMR
- R-3110 C, which extends from the ground surface up to, but not including, 9,000 feet AGL adjacent to MMR to the north and east
- R-3109 A, which extends from the ground surface up to, but not including, 9,000 feet AGL adjacent to MMR and R-3110 A and R-3110 B
- R-3109 B, which extends from 9,000 feet AGL up to, but not including, 19,000 feet AGL and above R-3109 A
- R-3109 C, which is adjacent to R-3109 A below R-3109 B and extends from the ground surface up to, but not including, 9,000 feet AGL

The Army would continue to permit and coordinate training, including aviation training operations, on the State-owned lands by other government users such as the U.S. Marine Corps and Hawaii Army National Guard in accordance with existing flight and safety regulations and noise abatement policies and procedures. Current military aircraft and airspace activities are documented in the existing *2018 Programmatic Agreement among Army Garrison, Hawaii, the Hawaii State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Routine Military Training Actions and Related Activities at United States Army Training Areas and Ranges on the Island of O'ahu, Hawai'i* and the 2008 *Oahu Implementation Plan,* recent biological opinions, and various resource management plans for the three training areas.

ELECTROMAGNETIC SPECTRUM

Commenters

Melodie Aduja, Environmental Caucus of the Democratic Party of Hawai'i	Makanalani Gomes	Keahi Piiohia
	Angela Huntemer-Sidrane	

Comments were submitted expressing concern about possible electromagnetic radiation and its impacts. The EMS-generating equipment at KTA, Poamoho, and MMR, and the potential health and safety risks associated with the EMS were considered and EMS was not carried forward for detailed analysis for reasons discussed in **Section 3.1.4**. The Proposed Action itself would not introduce new sources of electromagnetic fields or radiation. Under the alternatives in which land would not be retained, the Army would adhere to applicable Federal and State laws regarding investigation, removal, and cleanup of hazardous substances and wastes, including those potentially involving electromagnetic radiation, on the State-owned lands not retained.

UTILITIES

Commenters

Melodie Aduja, Environmental Caucus of the Democratic Party of Hawai'i	Amber Herzog Lyman	Ernest Y.W. Lau, P.E., Board of Water Supply, City & County of Honolulu
	Kyle Kajihiro	

Comments, including an agency letter from the Board of Water Supply, reflected concerns of groundwater and aquifer contamination from wastewater disposal systems. The Army currently conducts ground-based training at KTA. Potable water for military training activities at KTA is brought in by truck, and solid waste is collected by a licensed contractor. The limited wastewater utility infrastructure at KTA is not located on State-owned land. A currently inactive U.S.-Government-owned east-west communication line crosses the southern portion of Tract A-3. Electricity and stormwater infrastructure are not present at KTA. Power used during training at KTA is provided from portable generators. Potable water, solid waste, and portable generator services at KTA would continue for training activities on State-owned land retained, with no new construction or modernization. The U.S.-Government-owned communication line would be removed or abandoned in place if Tract A-3 is not retained by the Army.

No ground-based training currently occurs at Poamoho, and no utility services are present. There would be no utility additions at Poamoho under the Proposed Action.

MMR has the most utility services of the three training areas, but the infrastructure is limited. Currently inactive communication lines and a USGS water line cross State-owned land on MMR. Potable water, wastewater, stormwater, electrical, and solid waste utility infrastructure and services are present on U.S. Government-controlled land and not on State-owned land. Under the Proposed Action, the Army would continue to maintain and operate the current utility infrastructure at MMR with no new construction or modernization, but communication lines operated by the Army that cross any State-owned land not retained would be removed or abandoned in place.

HUMAN HEALTH AND SAFETY

Commenters

Abbi Abshire
Melodie Aduja, Environmental Caucus of the Democratic Party of Hawai'i
Noelani Ahia
Jim Albertini, Malu 'Aina Center For Non-violent Education & Action
Carrie Alford
Chloe Amos
Joseph Anderson
Leilani Antone
Aida Ashouri
Carley Atkins
Bronson Azama
Adnan B.
Adele Balderston
Lauren Ballesteros-Watanabe
Chelsea Barbee
Andrea Barnes
Lauren Harmony Blissett
Jonah Bobilin
Madison Brown
Karly Burch
Cheryl Burghardt
Czeska Cabuhat
Amy Cameron
Kenji Cataldo
Solomon Champion
Anna Chua, The Sierra Club of Hawai'i
Mary Clapp
Valerie Crabbe
Makanamakamaeonalani DaMate
Diana Dannoun
Mara Davis
Ashley De Coligny
Keoni DeFranco
Sierra Dew
Tiana Dole
Joy Enomoto, Women's Voices Women Speak
Malia Evans
Sasha Fernandes
Jonathan Fisk
Chris Foster
Makanalani Gomes
Lisa Grandinetti
Tina Grandinetti
Dee Green
Tyler Greenhill
Cameron Grimm
Carolyn Hadfield
David Henkin, Earthjustice on behalf of Malama Makua
Shannon Hennessey
Pomai Hoapili
Rebecca Hogue
Angela Huntemer
Jeanne Ishikawa, Wahiawā-Whitmore Village Neighborhood Board No. 26
Kalani Kaanaana
Iokepa Kaeo
Kyle Kajihiro
Kawena'ulaokalā Kapahua
'Alihilani Katoa
Aaron Katzeman
Katherine Kealoha
Kara Kelai
Gwen Kim
Miya King
Ara Laylo
Oriana Leao

Roberts Leinau
Claudia Leung
Uahikea Maile
Rebecca Mattos
Sorcha McCarrey
Douglas McCracken
Meleanna Meyer
Yuri Miyabara-Treschuk
Kane Kumu Honua Kama-kapu Mo'i Kamehameha, Sovereign Kamehameha Dynasty Government
Mariana Monasi
Zack Murphy
Makana Nalehua
Jarika Naputo
Luke Nemy
Amy O.
Shannon Lokelani Oberle
Lysandra Padeken
Aleka Pahinui
Merle Pak
Amy Parsons
Marisa Plemer
Barbara Pope
Deborah Pope
Shelly Preza
Michaela Primacio
Pumehana Puaoi-Perry
India Pyzel
Jordan Ragasa
Ikaika Ramones
Michael Reimer, Ph.D.
Andy Rivers
Tara Rojas
Abigail Rose
Anjoli Roy
Kawai Santiago
Taylor Saunders
Keith Scott
Sheela Sharma
Joseph K. Simpliciano Jr.
Samantha Snively
'Ilikea Snow
Chays Souza
Mariette Strauss
Alisha Summers
Liysa Swart
Drew Tanda
Kelsey Thornberry
Carol Titcomb
Michael Tom
Emily Townley
Grace Tsubaki-Noguchi
Annette Mehana Unten
Brandon Valeros
Christina Vien
Viana Villasenor
Karen Vitulano, US EPA, Region IX
Purdyka Wahilani
Adam Wayson
Joe Wilson
John Witeck
Anastacia Wolfgramm-Pineda
Nancy Wond
Troy Wong
Tom Wright
Kristen Young
Anne Zellinger
Unidentified Caller #9

Health and safety concerns were raised by over 100 commenters. Concerns included contamination of food from MC, lands deemed unsafe by live-fire training, wildfires, and flight accidents. The Proposed Action does not include additional health and safety measures beyond what is currently implemented by the Army. Ongoing activities within the State-owned lands were previously addressed in separate PAs, implementation plans, biological opinions, and resource management plans.

The EIS characterizes the health and safety conditions for military personnel and the surrounding communities from ongoing activities on the State-owned lands. Characterization of the existing health and safety conditions includes consideration of relevant safety reports and health studies, as well as additional information, such as how the Army works with local entities to provide essential police and emergency medical services to KTA, Poamoho, MMR, and the surrounding communities. The potential health and safety effects on military personnel and the community under each of the alternatives are analyzed in **Section 3.14.** The section also addresses the relationship between wildland fire and military presence on O'ahu. Per the *Army Wildland Fire Policy Guidance Memorandum* dated September 4, 2002, and AR 200-1, the Army implements and adheres to an *Integrated Wildland Fire Management Plan* that

provides wildland fire management and operational protocols to meet land management goals and objectives.

Historic and current land uses for the State-owned lands at KTA and Poamoho include military training, recreational hiking, and hunting. No ranges are present on the State-owned lands at KTA and Poamoho. Additionally, suspected UXO has not been found within the State-owned lands at KTA or Poamoho. Public access to the recreational trails at Poamoho is allowed by permit on weekends and holidays. Tract A-1 at KTA includes a motocross facility managed under a permit issued by DLNR. Tract A-3 is part of the Pūpūkea-Paumalū Forest Reserve, which has recreational trails and a public hunting area. Access to these two tracts is limited with the exceptions of the motocross facility, public hunting area, and recreational trails, which can be accessed on weekends and holidays (USACE-POH & USAG-HI, 2017c; USACE-POH & USAG-HI, 2017a).

The State-owned land at MMR consists of 782 acres, of which 722 acres have been subject to past live-fire activities. The North Ridge, Center, and South Ridge Tracts require authorization and coordination with U.S. Army Range Control for access, and UXO training and a UXO specialist escort may also be required. Hunting is not allowed at MMR. The North Ridge, Center, and South Ridge Tracts of the State-owned land at MMR are within the Mākua Valley and are used for Army tactical training (USACE-POH & USAG-HI, 2017b). Following all training exercises the Army conducts a routine cleanup process to ensure that no materials, to include debris, trash, and brass are left behind (USAG-HI, 2015a). Currently, military training is not conducted within the Makai Tract. When suspected UXO is found in a training area, it is reported to Range Control, and the explosive ordnance disposal (EOD) team investigates to identify the item and determine whether it is hazardous, can be removed, or must be destroyed in place. If destroyed in place, any remnants are removed following destruction (USAG-HI, 2018a).

The remaining State-owned land at MMR is within the Makai Tract, which was used in the past as an amphibious landing site with occasional small arms ammunition and military munitions use. Because the Army has performed surface and subsurface clearance of UXO and discarded military munitions to reduce the risk of encounters with MEC, this area does not require authorization for access. Information regarding other contamination on State-owned lands at KTA, Poamoho, and MMR is included in **Section 3.6**.

Currently, live-fire training exercises do not occur on State-owned lands at KTA, Poamoho, or MMR, and there are no current or former impact areas within the State-owned lands. Live-fire training exercises have not occurred on State-owned land at MMR since 2003 (USAG-HI, 2021i; USACE-POH & USAG-HI, 2017c; USACE-POH & USAG-HI, 2017a; USACE-POH & USAG-HI, 2017b).

Aviation training at KTA, Poamoho, and MMR includes maneuver flight operations using various aircraft, aviation support operations, and low-altitude helicopter maneuvers that are all conducted in accordance with FAA regulations and DoD and Army flight safety policies and instructions.

Additional health and safety conditions, including wildfire risk and prevention measures on State-owned lands, personnel and community safety, emergency services, and health and safety actions related to aviation training, are addressed in the EIS.

EIS Findings

This subsection includes responses to comments on reasonably foreseeable/cumulative impacts and mitigation measures.

REASONABLY FORESEEABLE/CUMULATIVE IMPACTS

Commenters

Abbi Abshire
Kerstyn Afuso
Noelani Ahia
Carrie Alford
Raed Alsemari
Kelsey Amos
Leilani Antone
Carley Atkins
Adnan B.
Lauren Ballesteros-Watanabe
Chelsea Barbee
Lauren Blissett
Jonah Bobilin
Puanani Brown
Madison Brown
Karly Burch
Cheryl Burghardt
Czeska Cabuhat
Amy Cameron
Kenji Cataldo
Liam Chinn
Anna Chua, The Sierra Club of Hawai'i
Mary Clapp
Lynell DaMate
Makanamakamaeonalani DaMate
Diana Dannoun
Sasha Davis
Mara Davis
Ashley De Coligny
Keoni DeFranco
Matthew Dekneef
Sierra Dew
Tiana Dole
Jamie Echols
Jordan Elicker
Joy Enomoto, Women's Voices Women Speak
Malia Evans
Kiersten Faulkner, Historic Hawaii Foundation
Sasha Fernandes
Jonathan Fisk
Chris Foster
Jonathan Galka
Sergi Gimenez
Makanalani Gomes
Lisa Grandinetti
Tina Grandinetti
Dee Green
Tyler Greenhill
Cameron Grimm
Shannon Hennessey
Tai Hino
Pomai Hoapili
Rebecca Hogue
Renee Hoomanawanui
Angela Huntemer-Sidrane
Sam Ikehara
Andrea Kaaawa
Kalani Kaanaana
Iokepa Kaeo
Kyle Kajihiro
Kawena'ulaokalā Kapahua
'Alihilani Katoa
Aaron Katzeman
Kara Kelai
Gwen Kim
Miya King
Ara Laylo
Claudia Leung
Uahikea Maile
Rebecca Mattos
Sorcha McCarrey
Douglas McCracken
Kalia Medeiros
Meleanna Meyer
Yuri Miyabara-Treschuk
Rita Miyamoto
Mariana Monasi
Shelley Muneoka, KAHEA: The Hawaiian Environmental Alliance
Makana Nalehua
Jarika Naputo
Luke Nemy
Amy O.
Lysandra Padeken

Aleka Pahinui
U'ilani Perry
Barbara Pope
Deborah Pope
Shelly Preza
Pumehana Puaoi-Perry
India Pyzel
Jordan Ragasa
Ikaika Ramones
Andy Rivers
Anjoli Roy
Kawai Santiago
Nic Santos
Taylor Saunders
Sheela Sharma
'Ilikea Snow
Mariette Strauss
Alisha Summers
Drew Tanda
Grace Tsubaki-Noguchi
Adam Tuifagu
Annette Mehana Unten
Ashlee Valeros
Brandon Valeros
Anna van Dorsten
Christina Vien
Viana Villasenor
Purdyka Wahilani
John Witeck
Anastacia Wolfgramm-Pineda
Troy Wong
Kristen Young

There were more than 100 comments received regarding potential cumulative impacts. These comments however contained specific concerns with cumulative impacts on specific resources. These comments are therefore captured within the resource sections and scoping summaries to which they pertain. As described in Council on Environmental Quality NEPA implementing regulations, an EIS "shall succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration, including the reasonably foreseeable environmental trends and planned actions in the area(s)" (40 CFR Section 1502.15). Reasonably foreseeable means "sufficiently likely to occur such that a person of ordinary prudence would take it into account in reaching a decision" (40 CFR Section 1508.1[aa]).

Chapter 3 presents a set of reasonably foreseeable actions and describes environmental trends on O'ahu. Reasonably foreseeable actions include both Federal and non-Federal actions, including potential Army actions at the three training areas, as well as substantial private developments that may affect O'ahu's environment. Environmental trends consider historical environmental consequences and how a continuation of these trends may affect the environment into the future.

In addition to analyzing the environmental consequences of the Proposed Action, each resource area covered in the EIS analyzes the environmental impacts associated with the reasonably foreseeable actions and environmental trends. The cumulative impact analysis considers actions where impacts of the Proposed Action would have a connection, in space or time, with impacts from other actions and consequently would have the potential to contribute to cumulative impacts. This connection includes one between individuals or groups who may incur impacts related to events of a historical nature (e.g., the connection between Native Hawaiians and the maintenance of customary practices). The timeframe for actions addressed in the cumulative analysis is 10 years, which is approximate to the timeframe anticipated for implementation of any of the action alternatives.

MITIGATION MEASURES

Commenters

David Henkin, Earthjustice on behalf of Malama Makua
Michaela Primacio

A couple commenters expressed the need and process under NEPA to formulate mitigation measures. Other comments included suggestions of possible mitigation measures such as community observers to monitor military activities and funding for community peer review of Army studies.

Mitigation measures avoid, minimize, or compensate for adverse impacts caused by a proposed action. When the EIS identifies adverse impacts that are not avoided, minimized, or compensated for via BMPs or SOPs, the EIS proposes mitigation measures that can generally include the following:

- Avoiding the impact altogether by not taking a certain action or parts of an action
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation
- Rectifying the impact by repairing, rehabilitating, or restoring the affected environment
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action
- Compensating for the impact by replacing or providing substitute resources or environments

When adverse impacts are identified, relevant resource areas of the EIS propose mitigation measures that would avoid, minimize, or compensate for adverse impacts specific to that resource. The EIS, however, does not determine the final set of mitigation measures; the final set of mitigation measures is codified in the ROD.

In some cases, adverse impacts cannot be mitigated. In cases such as this, the EIS states whether the Army has adopted all practicable means to avoid or minimize the adverse environmental impact. The Army will furthermore, after signing of the ROD, adopt and summarize, where applicable, a monitoring and enforcement program for any enforceable mitigation requirements or commitments.

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Appendix F

NEPA and other Environmental Planning Documents and Existing Management Measures

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Appendix F

NEPA AND OTHER ENVIRONMENTAL PLANNING DOCUMENTS AND EXISTING MANAGEMENT MEASURES

The Army has developed a number of NEPA documents; environmental, natural, and cultural resources management plans; and Standard Operating Procedures (SOPs) for its ongoing activities on O‘ahu training areas containing State-owned lands. This appendix lists: 1) NEPA documents (Environmental Assessments [EAs] and Environmental Impact Statements [EISs]) that addressed infrastructure improvements and training activities; 2) Biological Opinions and Memorandums of Understanding (MOUs) and associated mitigation measures; 3) environmental planning, compliance, and conservation documents and associated best management practices (BMPs), management measures, other memoranda/agreements, and implementation guidance documents; and 4) SOPs the Army follows to minimize the environmental and socioeconomic impacts of its ongoing activities within the State-owned lands.

The O‘ahu training areas (i.e., KTA, Poamoho, and MMR with State-owned lands) environmental planning, compliance, and conservation documents; BMPs; SOPs; and management measures are periodically updated. This appendix reflects the versions of these documents, BMPs, SOPs, and management measures at the time of preparation of this EIS. The Army also adheres to federal, State, and Army regulations, which are described in this EIS.

Table F-1 lists the available NEPA documents the Army and other agencies have completed for training and development and use of infrastructure including within the State-owned lands. In accordance with Hawai‘i Administrative Rules Section 11-200.1-24(d)(7), **Table F-1** does not include NEPA analysis conducted via categorical exclusion; however, it does include appropriate NEPA analysis documented via Records of Environmental Consideration (RECs), which are required for certain categorical exclusions or actions covered by existing or previous NEPA documentation (32 Code of Federal Regulations [CFR] 651.19). Additionally, in some cases, certain training and development and use of infrastructure predates the lease, predates CEQ NEPA regulations, or the NEPA documents have been lost over time; therefore, not all NEPA documents are available.

Table F-1: Training and Infrastructure within State-owned Lands	
Training/Infrastructure on State-Owned Lands	**Applicable NEPA Document**
KTA	
Maneuver/ Reconnaissance	2004 Hawai'i Stryker Transformation EIS; 2005 EA for Improvements to Drum Road; 1998 EA for Land Acquisition at KTA; 2010 Programmatic EA for Final Implementation Plan for O'ahu Training Areas
Assembly Area Operations	Pre-lease/pre-NEPA; NEPA documents cited above
Force-on-Force Operations	Pre-lease/pre-NEPA; NEPA documents cited above
Aviation Training Activities	Pre-lease/pre-NEPA; 2012 EIS for Basing of MV-22 and H-1 Aircraft in Support of III MEF Elements in Hawai'i
Unmanned Aerial Systems (UAS)	2019 O'ahu UAS Training REC
X-Strip [confined Landing Zone (LZ)]	Pre-lease/pre-NEPA; 2012 EIS for Basing of MV-22 and H-1 Aircraft in Support of III MEF Elements in Hawai'i
Poamoho	
Maneuver/Reconnaissance (past activity)	Pre-lease/pre-NEPA; 2008 EA for M1117 Armored Security Vehicles – Army Installations Hawaii
Aviation Training	Pre-lease/pre-NEPA
MMR	
Maneuver	2006 Programmatic EA for the Mākua Implementation Plan, O'ahu, Hawai'i; 2008 EA for M1117 Armored Security Vehicles – Army Installations Hawaii; 2010 Supplemental EA for Various Construction and Management Activities as part of the Mākua Implementation Plan, O'ahu, Hawai'i; 2009 MMR Training Activities EIS; 2002 Prescribed Burn EA
Assembly Area Operations	Pre-lease/pre-NEPA; NEPA documents cited above
Aviation	Pre-lease/pre-NEPA; NEPA documents cited above
UAS	2019 O'ahu UAS Training REC
Combined Company Arms Assault Course (CCAAC)	2009 MMR Training Activities EIS; 1985 CCAAC Construction and Operation EA

F.1 NEPA Documents and Appropriate Management Measures

General Army and other NEPA documents that address large-scale planning or training activities on O'ahu training areas containing State-owned lands are identified below. Management measures from these documents relevant to training land retention and O'ahu State-owned lands are also provided below.

- 2019 O'ahu Unmanned Aerial Systems (UAS) Training REC (USAG-HI, 2019)
  - Facilities/Training Covered: UAS Training Activities
  - Management Measures: None proposed
- 2017 EA for Implementation of the U.S. Army Garrison, Hawai'i and U.S. Army Garrison, Pōhakuloa Integrated Cultural Resources Management Plans [covers all Army training areas on O'ahu, including MMR] (USAG-HI, 2017b)
  - Facilities/Training Covered: None. This document only adopts the Integrated Cultural Resources Management Plan.
  - Management Measures: None proposed.
- 2013 Army 2020 Force Structure Realignment Programmatic EA (Army, 2013)
  - Management Measures: None proposed.
- 2012 EIS for Basing of NV-22 and H-1 Aircraft in Support of III MEF Elements in Hawai'i (Navy, 2012)
  - Facilities Covered: Landing Zones
  - Management Measures (from Record of Decision [ROD]):
    - Monitor conditions at the landing zones with highest risk for soil erosion. If soil erosion occurs, repair or maintenance the landing zones to reduce soil erosion.
    - Conduct cultural surveys of landing zones and then avoid or mitigate landing zones with cultural resources.
- 2009 MMR Training Activities EIS (USAEC & USACE, 2009)
  - Facilities/Training Covered: Maneuver, CCAAC, Staging (Assembly)
  - Management Measures (from Table 9 of the ROD):
    - Implement post-wildfire erosion control measures that may include native plant reseeding and selective planting of burned areas or engineering controls to redirect or control runoff.
    - Prepare and implement an erosion control plan. This plan will include provisions for periodic monitoring, methods for identifying erosion problems, and management practices for addressing erosion problems.
- 2008 EA for M1117 Armored Security Vehicles – Army Installations Hawaii (USAG-HI, 2008b)
  - Facilities Covered: Roads, trails, ranges, tactical vehicle maneuver and training areas
  - Management Measures (from Finding of No Significant Impact [FONSI]):

        - Develop master plans that would reduce vehicle travel.
        - Implement Executive Order 13423 goals to reduce greenhouse gas emissions.

- 2006 Final Programmatic EA for the Implementation of the Integrated Wildland Fire Management Plan [covers all Army training areas on O'ahu, including MMR] (USARHAW, 2006)
    - Facilities Covered: Firebreaks/access roads, dip tanks
    - Management Measures (from Section 4 of the Programmatic Environmental Assessment):
        - Access roads will be constructed with water bars to divert water from the road. In cases where access roads have a drainage ditch, the ditch will include erosion mitigation measures such as silt fences, check-dams, hay bales, or erosion control blankets. Fire access roads constructed on ash soils will be monitored and erosion will be assessed. Application of dust palliatives will be investigated for use to reduce the effects of wind erosion.
        - A burn plan will be completed in advance of ignition and will describe how the prescribed burn will be conducted, and include explanations of responsibilities, equipment support, fire prescription, weather constraints, contingency operations, risk assessment, and safety procedures.
        - Actions to mitigate the effects of exotic species introductions are: 1) thorough cleaning of all construction equipment prior to bringing it to MMR, 2) eradicating plants that are known to be 'invasive' once they have been detected, and 3) utilizing the fire access road maintenance schedule to eradicate non-native plants that have been introduced.
        - Site-specific archaeological surveys will be completed for all fire access roads and fuel management corridors prior to ground disturbance and implementation of fuel management activities. Subsurface surveys of the caves will be conducted to evaluate the potential for damage to the caves from activities occurring on the surface. Should any archaeological site lie in the path of intended construction, the construction path will be altered to the extent necessary to avoid all impacts to the site. Routes may also be altered, or use of heavy equipment may be limited if subsurface survey data shows caves are susceptible to damage. Archaeological sites will be marked with high visibility flagging. Construction crews will not enter any areas cordoned off with flagging for any reason. Periodic monitoring of all construction projects will take place by cultural resources staff to ensure no cultural resources are impacted. Any discoveries of suspected cultural resources during this project will be immediately brought to the attention of cultural resources staff and the U.S. Army Garrison-Hawai'i Cultural Resource Manager. The Army will conduct a Section 106 consultation with the State Historic Preservation Office and Native Hawaiians in accordance with the National Historic Preservation Act outlining these mitigations. The Army will not proceed with construction activities until the Section 106 consultation is complete.
- 2004 Hawaii Stryker Transformation EIS (Army, 2004)
    - Facilities Covered: Landing Zones, Training areas and trails including Drum Road
    - Training Covered: Maneuver, Reconnaissance, Aviation Training
    - Management Measures (from Table ES-22 of the EIS):

- Coordinate with State of Hawaii Department of Land and Natural Resources to create additional public hunting check in stations.
- Construct military vehicle trails to conserve existing natural features, including terrain and vegetative cover, to the extent practicable.
- Where practicable, enhance existing site conditions to help screen the proposed fixed tactical internet tower and support shed from the surrounding area.
- Implement dust control measures such as dust control chemical applications, washed gravel for surfacing, spraying water, or paving sections of trails to reduce fugitive dust associated with the use of training trails.
- Continue to work with affected communities on noise buffers and potentially adjust the buffer size dependent upon these discussions.
- Operate a public website that lists a schedule of upcoming U.S. Army Hawaii (USARHAW) activities, including training and public involvement projects.
- Minimize or avoid cut slopes, where practicable.
- Fence or flag where practicable any sensitive plant communities from activities.
- Use native plants in any new landscaping or planting efforts where practicable.

The type, volume, and conduct of training, maintenance and repair activities, and resource management actions that occur on KTA and Poamoho including on State-owned lands were also addressed in:

- 2010 Programmatic EA for the Final Implementation Plan for O'ahu Training Areas (USAG-HI, 2010d)
- A number of Army and other agency REC evaluations for projects and training activities, including establishment of landing zones, UAS training, specific scheduled training exercises, and water purification training, that were considered to be categorically excluded from EA or EIS analysis in accordance with the NEPA [covers all Army training areas on O'ahu, including MMR]

Training activities on MMR including on State-owned land were also addressed in:

- 2006 Programmatic EA for the Mākua Implementation Plan, O'ahu, Hawai'i (USAG-HI, 2006a), and the 2010 Supplemental EA for Various Construction and Management Activities as part of the Mākua Implementation Plan, O'ahu, Hawai'i (USAG-HI, 2010a)
- 2002 EA for a Prescribed Burn at MMR, Island of O'ahu (Army, 2002)
- 1985 CCAAC Construction and Operation EA (cited in USAEC & USACE, 2009)

Other NEPA Documents that address types of training activities or infrastructure at KTA, Poamoho, and MMR:

- 2005 EA for Improvements to Drum Road, Helemano Military Reservation to KTA (HQDA, 2005)
- 2004 EA for Testing of the M56 Smoke Generator System Millimeter Wave Module (USAG-HI, 2004)
- 1998 EA for Land Acquisition at KTA (USARHAW, 1998)
- 1982 EA for Amendment of Various Real Estate Agreements on KTA (Army, 1982)

F.2 Environmental Management Plans/SOPs and Associated Management Measures

The following non-NEPA/other guidance documents provide appropriate management or mitigation measures for training/infrastructure management; these include operations that were in-place pre-lease or be associated with other Army guidance or SOPs.

F.3 Biological Opinions and MOUs and Associated Mitigation Measures

- Amendment of the Biological Opinion of the U.S. Fish and Wildlife Service, Makua Military Reservation (USFWS, 2008)
    - Minimize wildland fire to *Hibiscus brackenridgei* and maintain four *H. brackenridgei ssp. mokuleianus* populations (two within the Mākua action area and two outside the action area) will be actively managed
    - Reduce and manage invasive species impacts to protected species and critical habitat
- 2007 Reinitiation of the Biological Opinion of the U.S. Fish and Wildlife Service for Military Training at Mākua Military Reservation, Island of O'ahu (USFWS, 2007)
    - Range operations staff will be fully trained and have an understanding of weapons restrictions based on fire danger, fuels project completion, and protected species locations and status
    - The Army will not use Ka'ena Point trail for any training activities
    - If an Army training-related fire ignites outside the firebreak road, all weapons usage will cease and USFWS will be notified within one hour
        - The Army will provide the USFWS with a briefing that includes the fire cause, forecasted and actual fire weather and fire behavior, and predicted and actual helicopter productivity
        - The training range will only be reopened after USFWS has determined the Army actions that contributed to the fire and the resulting fire suppression were conducted within the requirements of the BO
    - If a prescribed burn or a fire started by military training, burns any portion of an MU or designated critical habitat, the Army will meet with USFWS to determine next steps
    - Smoking is only permitted in the administrative bivouac site or near the Mākua Range
    - Control Building. Smoking is not permitted past the gate into the actual valley
    - All ordnance fired will be aimed to fall within the south firebreak road and targets will be placed to minimize the possibility of ammunition going outside the firebreak road
    - No live-fire training will be permitted when fire danger is high
    - No illumination rounds will be permitted at MMR

  - Live-fire training will take place on existing training ranges and will be contained in the surface danger zones
  - Open fires are not permitted anywhere at MMR
  - There will be no off-road vehicular activity at MMR
  - Prior to night training approval, helicopters must be authorized for wildland fire suppression usage
  - The Army will fully-fund the MIP Addendum and the Wildland Fire Management Plant
- 2004 Reinitiation of the 1999 Biological Opinion of the U.S. Fish and Wildlife Service for U.S. Army Military Training at Makua Military Reservation (USFWS, 2004)
  - The Army will coordinate with USFWS to develop a post- fire revegetation plan for any critical habitat that occurs within MMR.
  - A management action completion timeline and a critical habitat assessment will be included in the revegetation plan
  - Post- fire revegetation plan or other post- fire emergency action implementation cannot delay implementation of other MIP actions.
  - A specific fire management plan will be established for Kahanahaiki, Lower Ohikilolo, and Kaluakauila management units
  - The Army will provide an annual report describing species specific management actions completed that year.
  - The Army will coordinate with USFWS after every fire event that occur outside of or escape the firebreak road
- Routine Military Training and Transformation of the 2nd Brigade 25th Infantry Division (Light), Biological Opinion of the U.S. Fish and Wildlife Service, Island of O'ahu (USFWS, 2003)
  - General
    - Army to develop and implement Integrated Wildland Fire Management Plan
    - Invasive species management
      - Implement invasive species monitoring programs to minimize the threat of invasive species introductions from range maintenance, construction and training activities by implementing by implementing an invasive monitoring program within and adjacent to landing zones, trails, and roadsides
      - Newly found weeds will be eradicated
      - Prevent secondary weed spread from fire by monitoring and eradicating newly dispersed weeds
      - Provide wash racks to minimize dispersal of invasive species
      - Develop and implement an educational program regarding cleaning vehicles and field gear to all soldiers

        - Persons and equipment coming from foreign countries will go through U. S. Department of Agriculture and U.S. Customs inspections
        - Develop and distribute brown tree snake response and alert posters
        - Continue active participation in the O'ahu Invasive Species Committee
        - Develop a herpetofauna certification program
        - Establish the phytosanitation certification program
        - Coordinate with the Toxicants Working Group to determine a safe toxicant for controlling populations of newly established invasive species
        - Use environmentally safe toxicants for invasive species control or eradication
        - Identify the source and time of the invasive species introduction
        - Pursue implementation and funding for the licensing and application of more effective rodenticides
      - Reduce and avoid damage to endangered species by foot traffic via education, Integrated Training Area Management, fencing, and signage
    - KTA
      - Fence all occurrences of *eugenia koolauensis* to restrict foot traffic and remove ungulate pressure
      - Assess and develop solutions to minimize soil disturbance, vegetation loss, and other habitat degradation
      - Include Erosion and Sediment Control Management Plans where appropriate
      - Develop fuel modification plan for *eugenia koolauensis*
- Memorandum of Understanding (MOU) between the U.S. DoD and the USFWS to Promote the Conservation of Migratory Birds. The original MOU expired in 2019; an addendum signed on April 21, 2022, extends the MOU indefinitely or until either party determines the MOU needs to be revised
    - Follow all migratory bird permitting requirements for intentional take under 50 CFR 21.22, 21.23, 21.26, 21.27, or 21.41
    - Encourage incorporation of comprehensive migratory bird management objectives into relevant DoD planning documents
    - Manage military lands and non-military readiness activities in a manner that supports migratory bird conservation, habitat protection, restoration, and enhancement
    - Inventory and monitor bird populations on DoD lands to the extent feasible to facilitate decisions about the need for, and effectiveness of, conservation efforts work
    - Work cooperatively with USFWS and state and fish and wildlife agencies to promote timely development, effective review, and revisions of the Integrated Natural Resources Management Plan (INRMP), including any potential revisions to promote the conservation of migratory birds

- Incorporate conservation measures addressed in regional or state bird conservation plans in the INRMP development process
- Allow the USFWS and other partners reasonable access to military lands for conducting sampling or survey programs
- Support the economic and recreational benefits of bird-related activities by allowing public access to military lands for recreational uses, such as bird watching and other non-consumptive activities
- Develop policies and procedures for facilities design that will promote the conservation of migratory bird populations and habitat
- Prior to implementing any activity that has, or is likely to have, a measurable negative effect on migratory bird populations: identify the migratory bird species likely to occur in the area, assess and document, and engage in early planning and scoping with the USFWS
- Continue to promote the conservation of migratory birds on military lands
- Use a best-practices approach for routine maintenance, retrofitting, and management actions to the extent they do not diminish military readiness

F.4 Resource-Specific Environmental Planning, Compliance, and Conservation Documents and Associated BMPs, Management Measures, other Memoranda/Agreements, and Implementation Guidance Documents

F.4.1 [3.7] Air Quality and Greenhouse Gases / [3.9] Geology, Topography, and Soils / [3.10] Water Resources

- Dust and Soils Management and Monitoring Plan (USAG-HI, 2006b)
  - Restrictions on the timing or type of training during high-risk conditions
  - Assess road\trail conditions and suggest and implement mitigative measures to minimize fugitive dust emissions and soil erosion (i.e., proper road and trail construction, mechanical stabilization and the use of dust palliatives)
  - Vegetation monitoring
  - Active dust monitoring (KTA only)
  - Use of remote weather stations (KTA)
  - Buffer zones to minimize dust emissions in populated areas
  - Combat trail construction and maintenance
    - Grade combat trails and secondary roads in the training areas for a maximum density and minimum of voids to optimize moisture retention while resisting excessive water intrusion
    - Allow for adequate surface drainage

        - Conduct frequent maintenance on a semi-annual basis and more frequent if required, e.g., regrading, recompacting, or replacement of aggregate
        - Materials should be sufficiently cohesive to resist abrasive action and should have a liquid limit no greater than 35 and a plasticity index of 4 to 9
    - Mechanical stabilization of soils to minimize dust and manage erosion, which involves mixing soils of two or more gradations; the blending takes place at the construction site, a central plant, or a borrow area, and following blending, it is spread and compacted to the required densities by conventional means
    - Use of dust control palliatives, such as application of calcium, magnesium chloride, calcium lignosulfonates, or other environmentally friendly materials
    - Restrictions on helicopters hovering and landing are implemented if soil and atmospheric conditions indicate that excessive dust generation could occur
    - Adaptive management planning for training exercises considers installing a training buffer zone (currently 1,000 feet from residential boundaries) as appropriate based on the location and frequency of exercises, and hours and speed of movement to help minimize dust movement and air quality emissions off-installation

F.4.2 [3.7] Air Quality and Greenhouse Gases

- Other Air Quality Management Measures cited in other documents
    - Adherence to requirements for control of fugitive dust in HAR Chapter 11-60.1-33
    - Adherence to Unified Facilities Criteria 3-250-09FA, Aggregate Surfaced Roads and Airfields Areas, which provides dust control requirements for aggregate surfaced roads on O'ahu training areas, including those with State-owned lands

F.4.3 [3.14] Airspace / [3.8] Noise

- U.S. Army Garrison, Hawai'i Installation Compatible Use Zone Study (USAG-HI, 2017e)
    - Army Compatible Use Buffer program (military departments to partner with private by avoiding land use conflicts while protecting and managing critical habitat for threatened and endangered species in the vicinity of the installation)
    - Joint Land Use Study (collaborative land use planning effort with local governments that evaluates the planning rationale necessary to support and encourage compatible development of land surrounding the installation organizations to establish buffer areas around active installations)
    - USAG-HI issues a monthly training advisory to the public informing the local community, stakeholders, and elected officials of upcoming training on O'ahu that may be louder and noticeable than routine activities. The recurring advisories cover aviation, blank munitions, and UAS training, and convoys on local roadways. For stand-alone, large-scale, Joint- or Army-lead exercises on O'ahu, USAG-HI publishes a separate advisory to increase the public's general awareness of these training exercises

- To abate aircraft noise impacts, pilots are trained to avoid unnecessary overflight of populated areas and to avoid all residential areas, including those in sparsely populated areas. All pilots are trained to be sensitive to the concerns of nearby communities and to obey the no-fly zones around KTA
- U.S. Army Hawai'i Statewide Operational Noise Management Plan (USAPHC, 2010)
  - Locate/relocate ranges relative to natural impediments such as in valleys or behind large stands of trees
  - Construct artificial berms or enclose small arms ranges within walls and baffles.
  - Orient noise sources toward the interior of the installation property.
  - Implement fly-neighborly programs that adjust aircraft training times and routes to lower the impact on the community to the greatest extent possible given mission requirements
  - Adjust the timing, where feasible, of particularly disruptive activities to avoid
  - conflicts with local events such as church times or holidays
  - Keep the community informed (when feasible), making public any unusual
  - increases in the intensity of training or if training is to be resumed after a period of inactivity
  - Review of Environmental Assessments and Environmental Impact
  - Statements to ensure that the noise impacts of the proposed actions are
  - addressed and are consistent with the current Statewide Operational Noise Management Plan
  - Physical monitoring of the noise environment (as opposed to computer modeling)
  - when the noise environment is controversial, when a noise zone III exists in a noise sensitive area, and when a noise is unique and cannot be modeled
  - Incorporate noise contours as a GIS layer so that the contours may be combined with other layers (such as land use) and referenced when siting new facilities

F.4.4 [3.3] Biological Resources / [3.17] Human Health and Safety / [3.9] Geology, Topography, and Soils / [3.10] Water Resources

- Integrated Natural Resource Management Plan, Island of O'ahu (USAG-HI, 2010b)
  - Ecosystem management
  - Stewardship
  - Conditions and use
  - Military mission integration with sustainable land use
  - Natural resources consultation requirements
  - Partnerships and collaborative planning

- Public access
- Army compatible use buffers
- Hawai'i's Comprehensive wildlife Conservation Strategy integration
- Threatened and endangered species management
- Consultation
- Wetlands and deep-water habitat management
- Law enforcement of natural resources laws and regulations
- Fish and wildlife management
- Migratory bird management
- Vegetation management
- Forest management
- Pest management
- Land management
- Agricultural outleasing
- Outdoor recreation
- Bird/animal aircraft strike hazard
- Wildfire management
- Natural resources personnel training
- Coastal/marine management
- Floodplains management
- Community involvement and education
- Watershed management
- Aquatic health and water quality management

F.4.5 [3.3] Biological Resources / [3.17] Human Health and Safety

- Integrated Wildland Fire Management Plan O'ahu Installations (USAG-HI, 2017a)
  - Fire Prevention: education, enforcement, engineering, ignition control
  - Pre-Suppression Actions: risk analysis; ignition prevention; firebreaks, fuel breaks, and fuel management; infrastructure, resources, and supplies; personnel safety; use of prescribed fire; water resources; firefighting training program
  - Suppression Actions: fire response protocols, special considerations for firefighting on PTA, off-installation deployment
  - Post-Fire Actions: records and reports, reviews and formal investigations, post-fire analysis
  - Budget and Implementation

F.4.6 [3.3] Biological Resources

- Addendum to the Implementation Plan, Makua Military Reservation (USAG-HI, 2005)
    - The Mākua Implementation Plan emphasizes the management of three population units of plant species and 300 individuals of *Achatinella mustelina* in each Evolutionarily Significant Unit in accordance with the 2007 Mākua Biological Opinion and the 2008 amended BO. These BOs require that the Army to provide threat control for *Chasiempis ibidis* (O'ahu elepaio) in the Mākua Action Area, stabilize 28 plant species and *Achatinella mustelina*, and take precautions to control the threat and spread of fire
    - The natural resource management actions would include the construction of fences to protect native ecosystems and endangered species, alien species control, outplanting, and genetic material collections
- Implementation Plan for O'ahu Training Areas (OIP); Schofield Barracks Military Reservation, Schofield Barracks, East Range, Kawailoa Training Area, Kahuku Training Area, and Dillingham Military Reservation (USAG-HI, 2008a) [covers KTA and Poamoho only]
    - The OIP outlines stabilization measures for 23 plant species, 75 pairs of *Chasiempis ibidis* (O'ahu elepaio), and six extant Koolau *Achatinella* species, *Drosophila montgomeryi,* and *Drosophila substenoptera*. Of the 23 plant species, management activities are conducted for 11 species at KTA

F.4.7 [3.9] Geology, Topography, and Soils / [3.10] Water Resources

- Erosion Control Best Management Practices Program Plan (USAG-HI, 2021c)
    - The Directorate of Public Works (DPW) Environmental Division (ENV) personnel use field survey techniques to identify and correct erosion prone areas
    - DPW Engineering evaluates the areas based on City and County of Honolulu BMPs handbook to determine the preferred method for stabilization
- Storm Water Management Plan (SWMP) (USAG-HI, 2021c) [covers all Army training areas on O'ahu]
    - Army installations that operate a Municipal Separate Storm Sewer System (MS4) must obtain coverage under a small MS4 storm water permit from an authorized permitting authority and implement a storm water management program. All Army MS4s have measures in-place to ensure compliance with applicable permit recordkeeping and reporting requirements
    - Army installations implement storm water training programs to ensure that base personnel, contractors, and visitors are aware of their role in the program and the importance of their participation to its success
    - The USAG-HI DPW ENV staff will modify the SWMP when any discharge limitation or water quality standard established in HAR, Section 11-54-4 has been exceeded. They will include BMPs and/or other measures to reduce the amount of pollutants from entering state waters. The SWMP will also be revised when conditions on the installations change, when

more effective pollution controls are implemented, and when storm sewer system modifications occur

- DPW must retain records of all applicable monitoring activities, including, all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and a copy of the NPDES permit for a period of at least three years from the date of the sample, measurement, report or application, or for the term of this permit, whichever is longer
- Public Education and Outreach BMPs:
  - Develop a comprehensive education and outreach strategy that includes goals, target audience, distribution methods, and available resources.
  - Develop and distribute outreach materials, including pamphlets, displays, and signs
  - Installation of storm drain markings
- Illicit Discharge BMPs, per the requirement of the permit:
  - Establish a connection permits program for facilities not owned and operated by USAG-HI
  - Conduct field screening of storm drain outfalls
  - Establish a complaint investigation and spill hotline with an associated shared network database to track complaints and investigations
  - Establish enforcement policies for those not in compliance
  - Develop a Spill Prevention and Response Program
  - Develop a Used Oil and Toxic Materials Disposal Program
  - Conduct training for Environmental Compliance Officers and all pertinent facility personnel
- Construction Site Runoff Control BMPs:
  - Implement erosion and sediment control measures and BMPs in accordance with policies and manuals
  - Establish procedures for inventory of construction sites
  - Develop a procedure for tracking construction actions
  - Conduct inspections at construction sites
  - Enforce storm water requirements
  - Non-compliance actions
  - Training
  - Education
- Post-Construction BMPs:
  - Standards Revision
  - Review of Plans for Post-Construction BMPs

- BMP, Operation and Maintenance, and Inspections Database
- Education and Training

- Pollution Prevention/Good Housekeeping BMPs:
  - Debris control
  - Chemical applications
  - Erosion control
  - Maintenance activities
- Commercial Activities Discharge Management BMPs
  - BMP implementation
  - Enforcement
  - Inventory and mapping of commercial facilities and activities
  - Prioritizing areas for inspections
  - Inspections
  - Training

F.4.8 [3.6] Hazardous and Toxic Materials and Wastes / [3.9] Geology, Topography, and Soils / [3.10] Water Resources

- Spill Prevention, Control, and Countermeasures Plan (USAG-HI, 2012)
  - Designate one person who will be responsible for discharge prevention efforts (typically the unit ECO)
  - Schedule, conduct and document refresher training for oil-handling personnel at least once a year including review and evaluation of any known discharges or failures, malfunctioning components, and/or any new precautionary procedures or measures
    -
  - Drum Storage:
    - Generally, only containers of 55 gallons or greater are required having secondary containment; however, it is USAG-HI policy to store single wall containers in secondary containment or on containment pallets where possible
    - Typically, new petroleum products are issued to units in containers of 5 gallons or less
    - All drums must be stored in secure areas (fenced areas, secure walled enclosures or buildings)
    - ECOs shall inspect all drum storage areas on at least a monthly basis, ensuring tops of drums, secondary containment, and surrounding storage areas are free of oil residue
    - Dry absorbent shall be used to remove oils from surfaces; pressure washing is not authorized. Granular absorbent is an effective means of removing residual oil from asphalt and concrete surfaces

- All drums must be clearly marked with their contents. Empty drums must be labeled as "empty"
- Drums shall be in good material condition, and inspected regularly, at least monthly, for defects and corrosion using applicable checklists in the Installation Hazardous Waste Management Plan, or for tenants and contractors using comparable checklists
- Worn or damaged drums will be replaced immediately
- Material shall be stored only in drums compatible with the material being stored
- For storage of new or used petroleum products, only drums with top mounted bungs shall be used
- Non-sparking tools shall be used to open and close drums
- For used petroleum drums, a log shall be maintained indicating when material begins to accumulate in the drum, and every subsequent addition of material to the drum

o Filling and Handling:

- Caution shall be exercised at all times while handling petroleum, used oil, cooking oil and hazardous materials or wastes to prevent a harmful discharge to the environment
- Any loading/unloading connections are to be securely capped or blank-flanged when not in service or when in standby service for an extended time
- All loading/unloading vehicles are to be inspected prior to filling and departure to prevent discharges while in transit
- When significant quantities of POL (greater than 55 gallons), in single or multiple transfers will occur, block all down gradient storm or drainage openings within a 50-foot radius, prior to beginning the transfer. Before beginning transfer operations, have adequate supplies of absorbent materials such as socks, pillows, booms, and pads readily available. These are the best products to use because they are reusable. Drains and openings may be blocked by attaching a cover or by dikes of absorbent booms
- For tank filling: Inspect tank truck compartment(s) and hose(s) to ensure that there are is no potential for leaks, ensure that the tank secondary containment valve is in the closed position, place drip pans under connection points and other points with the potential for leakage to occur, use wheel chocks or other system to prevent tank trucks from moving prior to disconnection of transfer lines, and all tank filling operations should be observed by a trained employee. If a discharge does occur, stop the transfer and source of the leak so it does not enter a waterway or drain

o Mobile Refuelers and Transportable Fuel Storage Tanks/Bladders

- All refueling operations on USAG-HI installations using mobile refuelers and fuel storage tanks/bladders must be approved by DPW ENV
- Vehicles and fuel storage tanks that contain fuel shall be parked/placed within a secondary containment
- Tanker trucks and fuel storage tanks/bladders that carry fuel only when operating as tactical fuel points shall be emptied of fuel prior to returning to Garrison

        - Spill response and recovery equipment and supplies shall be located on each vehicle or by each storage tank/bladder and be readily available to refueling personnel
        - When establishing a tactical refueling point, tanker trucks and fuel storage tanks/bladders shall be parked/placed inside secondary containment units
        - Drivers and other personnel operating tanker trucks are required to have Fuel Handlers Certification. Standard training consists of the 40-Hour Fuel Handler Certification Course which encompasses safe fuel handling and spill response training
    - Compressed Gas Cylinders
        - All cylinders shall be stored safely in accordance with OSHA requirements; protected from the weather, stored and secured upright, be capped and clearly marked as to the cylinder's contents
        - Empty cylinders should be clearly identifiable as empty
        - Chains or other holding devices must be strong enough so as to break should the cylinder tilt, be placed approximately two thirds from the bottom of the cylinder to prevent it from falling over the device and will not be placed around the cylinder valve
    - Gas Cans
        - Only empty fuel cans be returned to the MPC after field operations
        - It is recommended that unused fuel be used to top off vehicle fuel tanks. Cans containing fuel shall be stored in a secure, marked storage point with adequate secondary containment
    - Convoys of Military Vehicles
        - Tactical military vehicle convoys traveling off USAG-HI installations shall be equipped with spill recovery equipment and supplies to respond to small oil, radiator, or hydraulic fluid leaks
        - At a minimum, supplies shall include drip pans, absorbent pads, socks/booms, and granular or other loose absorbent, durable plastic bags, broom, shovel, and container for the used absorbent
        - Leaks and spills are likely to be small and non-reportable but should be recovered on the spot and in a timely fashion
        - If a spill occurs, care shall be exercised to prevent/minimize release onto soil or into drainage systems by taking the following steps: 1) Park the leaking vehicle/equipment over concrete or asphalt surface whenever possible and safe to do so. 2) Place drip pan under the leak. Alternatively, place absorbent pads over impervious surface (e.g., plastic bags) to absorb the leak. 3) Immediately block off pathways to soil and drainage systems with socks/booms. 3) Clean up the spill with absorbent material
        - All transportation-related spills of Army and USAG-HI units and activities shall be reported to the Installation Transportation Officer (ITO)
- Implementation Guidance for Army Compatible Use Buffers (DA, 2020)

F.4.9 [3.6] Hazardous and Toxic Materials and Wastes

- Asbestos Management Plan (USAG-HI, 2001a)
  - Manage asbestos-containing material in-place as long as practicable and prudent
  - Ensure all facilities are adequately surveyed
  - Provide technical assistance, training, and guidance to USAG-HI personnel involved with asbestos-containing material
- Installation Hazardous Waste Management Plan (IHWMP) (USAG-HI Regulation 200-4)
  - Waste generated from Medical Command (MEDCOM) medical facilities/operations on USAG-HI installations including regulated and non-regulated medical waste, excess, and expired pharmaceutical products including Class VIII medical materials. Medical wastes must be managed in accordance with IAW USAG-HI Policy, Management of Class VIII Medical Supply Items
  - Training of in-house staff members, including contractors, to ensure they are knowledgeable of hazardous waste and IHWMP requirements
  - Systematically evaluate waste streams to ensure all potential hazardous or special wastes are properly identified, characterized, and managed
  - Implement pollution prevention initiatives to minimize the generation of hazardous waste
  - Monitor hazardous waste generated on USAG-HI installation
  - Manage the Installation Enterprise Environmental Safety and Occupational Health Management Information System Hazardous Waste Module for the tracking of hazardous waste on USAG-HI installation
  - Staff and manage the Environmental Compliance Training program to train and certify all Environmental Compliance Officer (ECOs) through training curriculum and certification
  - Instill an environmental responsibility attitude and work ethic in soldiers and civilians under their command and ensure personnel receive required environmental training
  - Ensure that all personnel who handle hazardous waste read and become familiar with the site-specific unit/activity/directorate hazardous waste SOP prior to handling hazardous waste
  - Manage all hazardous material IAW all applicable Federal, State, DoD, Army and installation regulations
  - Ensure that all fuel storage and fuel transfer operations have been authorized by the DPW ENV
  - Inspections to ensure that hazardous material is managed properly
  - Contact DPW Environmental Services immediately after identifying a hazardous waste in order to schedule an on-site pre-inspection and pickup of hazardous waste
  - Ensure remedial action is initiated for leaks, spills, or improper storage

  - All hazardous material has an EESSOH-MIS barcode from the Hazardous Material Control Point (HMCP)
  - A Safety Data Sheet (SDS) must be present in a visible and easily accessible location for each hazardous material
  - Hazardous materials are properly stored and segregated
  - Expired/excess hazardous materials are turned-in promptly to the HMCP or DPW Transfer and Accumulation Point (TAP) as applicable
  - Spill kits must be maintained with appropriate sorbent materials, containers, and other spill response equipment for containing spills IAW USAG-HI-SPCCP 3.5.1. Supplies should be determined based on the type and amount of hazardous material used/stored
  - Ensure new products are segregated from in-use containers
  - Ensure flammable materials are placed back into flammable storage cabinets when not in use and at the end of each day
  - Ensure that damaged or leaking containers are over-packed
  - Ensure that materials which are transferred from their original container are transferred to a new container that is capable of safely storing the material
  - Ensure that new containers holding transferred materials are properly marked and labeled IAW the OSHA Hazard Communication Standard
  - Required personal protective equipment (PPE) items shall be available for all hazardous material handlers IAW SDSs
  - Reuse materials to the greatest extent possible instead of disposing of them
  - For degreasing/cleaning operations, units/activities use the Government solvent recycling service
  - Using a less hazardous or sometimes even a non-hazardous product in-place of a hazardous one
  - When a waste is generated, segregation of the wastes is required to increase the reclamation potential of the waste material generated
  - All personnel must ensure that all instances of non-compliance with environmental laws and permits are identified and corrected immediately
  - Units/activities/directorates that generate or have a potential to generate hazardous waste must develop and implement an SOP specifically for their hazardous waste management activities
  - SOPs must be developed prior to any generation of hazardous waste on the installation
  - All hazardous waste generated on USAG-HI installations is shipped to the Disposition Services Pearl Harbor (DSPH) or their designated contractor for disposal or picked up by the DSPHs disposal contractor on-site
- Integrated Pest Management Plan, U.S. Army Garrison, Hawai'i: 2015-2020 (USAG-HI, 2014e)

  - Identifies responsibilities; necessary resources; administrative, safety, and environmental requirements; priorities for pest management
  - The Range & Training Land Program (RTLP) planning process directly supports integration of environmental stewardship into its operation
- Integrated Solid Waste Management Plan (USAG-HI, 2009b)
  - Optimize the movement and deployment of people, equipment and materials
  - Utilization of the Environmental Management System (EMS) that is a part of the USAG-HI Strategic Sustainability Action Plan (SSAP) that integrates environmental considerations into all operations and systematically identifies, evaluates, and controls environmental impacts associated with those operations
  - Use of environmentally preferable products where applicable, with emphasis on mandates for recovered materials, biobased products, and energy efficiency
  - Recordkeeping system (Solid Waste Annual Reporting System Web-version (SWARWeb) to track materials diverted and disposed. (KTA and MMR do not have recyclable collection)
  - Ensure regular and systematic collection of solid wastes
  - Brass, fluorescent light fixtures, and scrap metal are recycled through the Defense Reutilization and Marketing Office (DRMO)
- Lead Hazard Management Plan (USAG-HI, 2001b)
  - Educate personnel about lead hazards and methods of control
  - Provide technical guidance to protect workers from overexposure to lead. Develop public awareness and worker education programs to communicate the risk associated with exposure to lead hazards, ways to prevent or control exposures, and corrective actions to prevent, manage, and abate hazards
  - Direct modifications or changes to the Plan when necessary to improve operations or to comply with new regulatory requirements
  - Update real property records to reflect the results of the lead-based paint (LBP) surveys
  - Coordinate completion of surveys of facilities prior to renovation, demolition, maintenance, and other DPW activities that may disturb lead-containing materials
  - Ensure that dust control methods be applied when painted surfaces are disturbed. The control methods include manual scrapping, wet sanding, or dustless sanding (sander with High Efficiency Particulate Air vacuum attached). Power-tool sanding shall not be used
  - Ensure that maintenance personnel are properly trained and equipped to work with activities involving any cutting, drilling and sanding of painted surfaces according to OSHA 29 CFR 1926.62 regulation
  - Integrate with other installation programs such as environmental compliance, Whole Neighborhood Revitalization, and EPR Report or DD Form 1391
  - Plan and document to ensure regulatory compliance and to provide a historical record for legal liability and future project planning

F.4.10 [3.10] Water Resources

- Operational Range Assessment Program
  - Long-Term Monitoring Program (ground and surface water quality at MMR)

F.4.11 [3.4] Historic and Cultural Resources / [3.5] Cultural Practices

- Integrated Cultural Resources Management Plan for the U.S. Army Garrison – O'ahu (USAG-HI, 2018) [covers all Army training areas on O'ahu, including MMR]
  - SOP 1: Compliance Procedures for National Historic Preservation Act Section 106
  - SOP 2: Identify and Evaluate Historic Properties
  - SOP 3: Unanticipated Discovery of Historic Properties and Inadvertent Discovery of Human Remains and/or Cultural Items
  - SOP 4: Emergency Situations
  - SOP 5: Native American Graves Protection and Repatriation Act: Planned Activities and Comprehensive Agreements
  - SOP 6: Archaeological Resources Protection Act of 1979 Compliance Process
  - SOP 7: Native Hawaiian Consultation
  - SOP 8: Archaeological Collections Curation and Management
  - SOP 9: Maintenance Procedures for Historic Buildings and Structures
- Programmatic Agreement Among U.S. Army Garrison, Hawai'i, The Hawai'i State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Routine Military Training Areas and Ranges on the Island of O'ahu, Hawai'i (DA, 2018; USAG-HI, 2018a)
  - Identifies stipulations for Army undertakings for training and related activities
- Memorandum of Agreement Between the US Army Garrison – Hawai'i, the Hawai'i State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Vegetation Management in Various Archaeological Sites in Makua Military Reservation, O'ahu, Hawai'i. (USAG-HI, 2015c)
- Four 2014 NHPA Section 106 memoranda to the SHPO that cover training on MMR

F.4.12 [3.2] Land Use / [3.6] Hazardous and Toxic Materials and Wastes / [3.9] Geology, Topography, and Soils

- USARHAW Integrated Training Area Management (ITAM) 5-Year Plan
  - Range and Training Land Assessment (RTLA) Plan for Hawai'i
    - Ensures through RTLA data and information that biological considerations are part of the Land Rehabilitation and Maintenance project prioritization process; Examples from 2008-2012 program:
      - Conduct annual/semi-annual road and trail assessment reports for all ranges

        - Monitor and assess training area erosion by identifying specific areas requiring mitigation and working with LRAM to identify revegetation methods with highest success rates for ecological attributes (soils, precipitation, etc.)
        - Assess and monitor the condition of open maneuver areas in order to maintain and accommodate highest capacity possible—identifying locations which may be sources of off-site sediment generation and suggest alternative training locations
        - Post-LRAM project monitoring and assess integration of BMPs used as part of rehabilitation efforts to ensure practicality of rehabilitation measures and maintain optimum training capacity
    - Training Requirement Integration
        - Consultation with range officer personnel, trainers, environmental technical staff, natural and cultural resources managers, and other environmental staff members to integrate land management, training management, and natural and cultural resources management data with training requirements and data derived from range and training land assessment (RTLA) and Army conservation program components
            - Environmental/Sustainable Range Awareness
        - Develop and distribute educational materials to users of range and training assets
        - Integrates Sustainable Range Awareness into existing command and/or installation operational awareness activities and events, and initiate new events with materials relating to procedures that reduce the potential for inflicting avoidable impacts on range and training land assets, including local natural and cultural resources
            - Increased education through partnership with Land Range and Maintenance and engineering trainers, on BMPs and their effective implementation
- USARHAW Range Complex Master Plan (USARHAW, 2022)
    - KTA
        - Live-fire and trace ammunition prohibited
        - All munitions, smoking and cooking/warming fires prohibited during Red Fire Index
        - Protocols for notifications when fires start (to allow officer in charge to initiate "cease fire" and ONR manager to take appropriate steps when federally listed plants or animals are potentially threatened)
        - Minimum staffing and fire response (including fire equipment) must be in place for training to occur
        - Wash rack use is required to limit spread of invasive species
        - Foot maneuver limited to areas that do not contain endangered species (i.e., lower elevation areas)
        - No-go areas to prevent the spread of invasive plant species (i.e., devil weed)
    - Kawailoa Training Area (Poamoho)
        - Training is limited to no ground maneuvers and limited touch and go operations

        - Endangered species fence units exclude training and only natural resources staff is permitted inside
        - Foot maneuver limited to areas that do not contain endangered species (i.e., lower elevation areas)
    - MMR
        - Training is restricted to within the firebreak system
        - Training is prohibited during certain periods based on the Red Fire Index Status in efforts to protect sensitive 'Elepaio critical habitat on most the northern, eastern, and southern (one-third) boundary
        - Two endangered species fence units to the north and northeast are maintained with restricted personnel access
        - Weapons use is restricted based on:
            - Stabilization status of certain endangered species
            - Seasonal variability in grass greenness
            - Hourly fire danger rating
        - [When live-fire resumes] Limited to certain types of weaponry (no tracers) and only occurs under certain weather conditions
        - Helicopter flyover rules to avoid impacting endangered species

F.5 Standard Operating Procedures

- 402nd Army Field Support Brigade Standard Operating Procedures No. 004-15: Convoy Operations in Hawai'i (DA, 2016)
- *USARHAW Installation Aviation Standardization Committee (IASC) SOP: Aviation Local Flying Rules*
    - When flying in Warning/Restricted Areas of O'ahu, Army aircraft must:
        - Contact Range Control and obtain permission prior to entry
        - Maintain communications with the Wheeler Army Airfield Tower (during operational hours) when within the Class D surface area
        - Remain below 200 feet above ground level unless otherwise approved by Range Control.
        - Avoid over flight of housing areas and buildings
    - The Army implements the following rules and regulations for noise abatement in Hawai'i:
        - Operations at Wheeler Army Airfield from 2200 to 0600 daily are restricted to departures, arrivals, and refueling operations (no closed traffic)
        - Terrain flight training will be conducted only on the Schofield, Mākua, Dillingham or Pōhakuloa Military Reservations, or in the Tactical Flight Training Area

- Overflight of designated noise sensitive areas below 3000 feet mean sea level (O'ahu) is prohibited unless complying with paragraph e. below
- Wheeler Army Airfield Base Operations will maintain a master map of all designated noise sensitive areas for the island of O'ahu
- When operating in areas other than the Tactical Flight Training Area, military reservations or designated noise sensitive areas, pilots will maintain a minimum of 1000 feet above ground level (AGL), with the following exceptions:
  - When adhering to published routes and the altitudes associated with these routes. Published routes may be found in DoD flight information publications, Wheeler Army Airfield Standard Operating Procedures, and the Hawai'i Airports and Flying Safety Manual. (*Aircrews are requested to restrict practice instrument approaches over Mililani and Wahiawa to essential flights only and to increase minimum descent altitudes of practice approaches as much as practical while still maintaining weather requirements*)
  - When complying with these altitudes would violate basic VFR weather minimums. Pilots are urged to use alternate routes if weather will not permit flight at the published route altitude
  - When conducting flights in support of civilian law enforcement or public safety agencies
  - When on a night vision goggle (NVG) formation flight conducted over unpopulated areas. The routes must be reconned during daylight at the altitude to be flown NVG. The routes must a have a minimum of 2,000 feet lateral clearance from any populated or posted noise sensitive areas and a minimum of 1,000 feet lateral clearance from any single dwelling. Minimum NVG mission altitude will be 500 feet above ground level. Approval authority for these NVG formation flights will be no lower than Battalion/Squadron Commander
- Aircraft transitioning along shorelines will remain a minimum of 1/4 nautical mile off-shore or 1,000 feet above the highest obstacle within 2,000 feet laterally, unless complying with paragraph e. above
- Intentional flight within 1,000 feet, vertically or laterally, of a whale or whale pod is prohibited by federal law. If flying below 1,000 feet above the surface and these animals are observed, alter flight path so as to avoid them by 1,000 feet
- Prior to descending for terrain flight operations, conduct a high reconnaissance and survey the area for livestock/hazards. Increase altitude or avoid sections of routes that could affect livestock in the vicinity
- Intentional flight within 1,000 feet, vertically or laterally, of any surface vessel is prohibited

- Army Pamphlet 385-24, The Army Radiation Safety Program, and 385-10 The Army Safety Program (cited in EMS)
- **KTA:** Standard Operating Procedures for Kahuku Training Areas (USAG-HI, 2020a)
  - Foxholes and sumps digging are not authorized without prior approval

- No privately-owned vehicles are permitted on the range at any time
- Tactical vehicles must park in the designated parking area
- Unless otherwise posted, the maximum speed limit is 15 miles per hour
- Red signs indicate areas that are off limit areas
- All vehicles are washed down at the KTA was rack prior to departing KTA
- Emphasis on fire prevention and mitigation of training causing fire ignitions at KLOA Training Area. The area is currently only authorized blank ammunition
- Special emphasis on reducing or eliminating any adverse environmental impact during any proposed training exercise
- Air operations require a Notice to Airman (NOTAM) for all aircraft supporting Airmobile and Airborne Operations
- Appropriate measures are taken to ensure that scheduled Drop Zone and LZs are clear of equipment, vehicles, tents and other obstacles prior to all air operations. Included is posting of guards, barriers or other measures to prevent entry into the area
- Foxholes and sumps digging is not authorized unless such excavations are approved by Range Operations. The supported units will repair any damage to improvements from excavation or back filling
- All personnel will be briefed on the safety procedures involving unexploded ordnance, misfires and weapons or munitions malfunctions as contained in paragraph 2-16 of USARHAW Regulation 350-19

- **Poamoho:** Standard Operating Procedures for Kawailoa Training Area (USAG-HI, 2020b)
  - Emphasis on fire prevention and mitigation of training causing fire ignitions at KLOA Training Area. The area is currently only authorized blank ammunition
  - Special emphasis on reducing or eliminating any adverse environmental impact during any proposed training exercise
    - Air operations require a NOTAM for all aircraft supporting Airmobile and Airborne Operations
  - Appropriate measures are taken to ensure that scheduled Drop Zone and L Zs are clear of equipment, vehicles, tents and other obstacles prior to all air operations. Included is posting of guards, barriers or other measures to prevent entry into the area
  - Foxholes and sumps digging is not authorized unless such excavations are approved by Range Operations. The supported units will repair any damage to improvements from excavation or back filling
  - All personnel will be briefed on the safety procedures involving unexploded ordnance, misfires and weapons or munitions malfunctions as contained in paragraph 2-16 of USARHAW Regulation 350-19
  - Ensure personnel use proper PPE during applicable activities at the ranges.

- During scheduled Air/Heavy drops, the OIC must ensure posting of road guards or closing barriers to deny entry in to drop/landing zone
- Flameless ration heaters are unauthorized in dumpsters. Unit is responsible for disposal of heaters
- Records are maintained on the type of ammunition fired, number of rounds fired and number of duds to include their approximate location
- After training is completed the OIC will ensure that:
  - The range is cleared of all debris, trash, brass, and the range is left in a good state of cleanliness
  - The ammunition point is free of any debris
  - All holes are filled and area is returned to how the range was when first occupied
  - The Range Control is notified of training completion and is provided the ammunition expended, number of personnel trained, and the amount and type of vehicles on-site
  - The Range Control has cleared the unit of the range. All items issued has been returned to Range Control
  - Wash rack is scheduled and all vehicles washed down prior to departing East Range Training Area
  - The procedures for Ammunition Accountability are followed by all units using training ammunition on the live-fire ranges and in the training areas
  - Ensures training ammunition is inventoried by a responsible person at the time of storage and every 24 hours thereafter
  - Ensures ammunition detail departs ammunition area immediately upon completion of shift
  - Ensures ammunition is issued in an orderly manner
  - Ensures no weapons are held, stored or disassembled near the ammunition area
  - The OIC will remove all ammunition residue prior to clearing the range
  - The OIC ensures all training areas are policed, to include the removal of all trash, obstacle wire, pyrotechnics debris and ammunition brass. Concertina wire will be removed from the training area. Do not dump wire in a different location. If caught, the Battalion Commander will be notified and the OIC and Range Safety Officer will be decertified

- **MMR:** Standard Operating Procedures for Makua Military Reservation (USAG-HI, 2015a)
  - There will be a dedicated 457-acre impact area within the CCAAC
  - Blank fire is only authorized with fire support coordination
  - Pyrotechnic use is only permitted east of Coyote Objective
  - No training is conducted on Mākua Beach
  - There is no digging allowed

- No privately-owned vehicles are permitted on the range at any time
- Tactical vehicles must park in the designated parking area
- Unless otherwise posted, the maximum speed limit is 15 miles per hour
- As specified in USARHAW Regulation 350-19, using unit must be given a clearance inspection prior to departing the range complex. The range inspection checklist is used for clearing. A unit which fails to clear will be denied use of all ranges and facilities until that range, firing point, or training areas have been cleared.
- The range inspection requirements will be used and kept on file at Range Control for thirty (30) days
- The Officer in Charge (OIC) will contact range operation immediately to coordinate day and time for areas inspection
- The OIC ensures all training areas are policed, to include the removal of all trash, obstacle wire, pyrotechnics debris and ammunition brass. Concertina wire will be removed from the training area. Do not dump wire in a different location. If caught, the Battalion Commander will be notified and the OIC and Range Safety Officer will be decertified
- The OIC ensure all excavated areas (fighting positions, tank traps, trench systems, etc.) are back filled and returned to its original state
- The OIC ensures portable latrines are clean and free of trash and coordination for removal if the unit had the contractor deliver the latrines for the exercise
- The OIC returns all issued equipment and signed clearing sheet to Range Control
- While training, units must use caution during training exercises. Soldiers must be aware of and adhere to fire danger-rating restrictions of incendiary ammunition, pyrotechnics, smoking, and other ignition sources. Strict compliance with training restrictions set forth herein will reduce the number of fire starts
- While training, units must use caution during training exercises. Soldiers must be aware of and adhere to fire danger-rating restrictions of incendiary ammunition, pyrotechnics, smoking, and other ignition sources. Strict compliance with training restrictions set forth herein will reduce the number of fire starts

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Appendix G

Land Retention Estate Assumptions

Lease vs. Fee Simple Comparative Assumptions and Additional Considerations

Current [1964] Leases

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Lease vs. Fee Simple
Comparative Assumptions
and Additional Considerations

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Land Retention Estate Assumptions

Lease vs. Fee Simple Comparative Assumptions and Additional Considerations

For analysis purposes, this EIS assumes:

- There would be no difference in ongoing activities in the State-owned land retained under the various alternatives, and applicable land retention estates selected for analysis (i.e., fee simple title, lease, easement).
- A new lease or easement for the State-owned land(s) would include the same conditions as the current lease(s), except for conditions no longer relevant, and would include Army restrictions/requirements based on current lease and settlement agreements by the State or U.S. Government.
- The Army would adhere to applicable State regulations/administrative requirements (e.g., administrative rule changes) under a new lease or easement, subject to lease negotiations. .
- The Army would conduct lease/easement compliance actions at the end of a new lease or easement.
- The State will accept a petition for, and authorize, an administrative rule change that creates a new Conservation District subzone under HAR 13-5 that allows for military activities.
- The State will accept a petition for, and authorize, a special use permit in the Agricultural District under HRS 205-6. (Applicable to KTA Parcel A-1 only).

Therefore, ongoing activities, lease/easement conditions, assumed Army restrictions/requirements based on State agreements or judicial directives, and State regulations/administrative requirements would be the same under lease and easement and the potential impacts under lease and easement would be the same.

If the Army were to retain all or some of the State-owned land(s) via lease, it is assumed the Army would be held to new lease conditions which are the same or similar to the existing lease(s) as well as the aforementioned State regulations/administrative requirements to the degree practicable. It is assumed that the lease conditions would allow military use with Army actions that uphold conservation district values. It is further assumed there would be no change from current Army and State rights, requirements, and limitations.

If the Army were to acquire some or all of the State-owned land(s) via fee simple title, then the Army would not be held to conditions of any new lease or assumed Army requirements based on State requirements from other license agreements. It is however assumed the Army would still conduct many of the same actions as it does under the current leases to the degree practicable, and in compliance with existing Army policies and requirements.

It is assumed Army and State rights, requirements, and limitations in the lease and other agreements would not change if the State-owned land were to be retained via lease; therefore, **Table G-1** presents assumed changes in Army and State rights, requirements, and limitations if the State-owned land were to be retained via fee simple title. The current lease conditions are grouped into categories (i.e., State rights,

State obligations, limitations on training, Army obligations, and additional considerations) for ease of comparison of the potential differences.

Table G-1 only addresses State-owned land(s) retained. Army and State rights, requirements, and limitations in the lease would not apply for any State-owned land not retained; therefore, these potential impacts would differ from the State-owned land retained.

The first column in the table describes the current lease terms for the State-owned lands within the training areas; the alpha-acronym + numerals indicate the training area and paragraph number within the lease where the specific lease term can be found. The second column indicates a lease retention method scenario. The third column indicates a fee simple title retention method scenario. A statement shown in the third column is the assumption used in the analysis under the Army fee simple title retention method.

Tables G-2 and **G-3** below provide additional considerations and associated assumptions for the training areas. There are no additional considerations for Poamoho.

Table G-1: Lease vs. Fee Simple Title Comparative Assumptions

Oahu 1964 Leases (Kahuku Training Area-KTA, Poamoho-Po, Makua Military Reserve-MMR)	Potential New Lease Scenario	Fee Simple Title Scenario
State rights		
Right to enter (KTA20, Po20, MMR18)	Same	N/A
State can place signs (KTA18, Po18, MMR-N/A)	Same; MMR-N/A	N/A
State Permission required for construction (KTA10, Po10, MMR9)	Same	N/A
Written consent for certain construction (KTA10, Po10, MMR9)	Same	N/A
Disputes decided by the District Engineer (KTA30, Po30, MMR27)	Same	N/A
Water and mineral rights (KTA14 & 22, Po14 & 22, MMR-N/A & 20)	Same; MMR-N/A (future water rights)	State would lose water and mineral rights
Other special rights (grazing-KTA7, State water lease-Po7, MMR-N/A)	Same; MMR-N/A	Same; Other special rights granted to others (i.e., private or State) would remain as encumbrances
Limitations on Training		
Fire all combat weapons into the impact area (MMR8 &16, KTA & Po-N/A)	Same; KTA & Po-N/A)	Same; Army would not change impact area

Table G-1: Lease vs. Fee Simple Title Comparative Assumptions		
Oahu 1964 Leases (Kahuku Training Area-KTA, Poamoho-Po, Makua Military Reserve-MMR)	**Potential New Lease Scenario**	**Fee Simple Title Scenario**
Stockpile supplies and equipment orderly and away from established roads or trails (KTA9, Po9, MMR8)	Same	Same; Army would continue current practices for stockpiling supplies/equipment
Avoid destruction of vegetation/wildlife and forest cover/geological features and natural resources (KTA12, Po12, MMR11)	Same	Same; Army would continue current practices for protection of vegetation… natural resources (exception may be for state listed species take procedures)
Avoid damaging cultural/historic resources (KTA13, Po13, MMR12)	Same	Same; Army would follow federal and State laws for cultural/historic resources
Certain areas must be available for hunting (KTA16, Po16, MMR 14 & 17)	Same	Same; Army would maintain current hunting and recreation areas
Army Obligations		
Remove or deactivate live or blank ammunition (KTA9, Po9, MMR8)	Same	Army would only be required to cleanup retired/closed ranges
Fire Fighting (KTA11, Po11, MMR10)	Same	Same; Army would adhere to current SOPs/Integrated Wildland Fire Management Plan
Maintain roads to prevent erosion & traffic flow (KTA10 & N/A, Po10 & N/A, MMR9 & 16)	Same; traffic flow for KTA and Poamoho-N/A	Same; Army would adhere to current management measures/BMPs & SOPs
Reforest areas where Army has destroyed forest cover (KTA28, Po28, MMR-N/A)	Same; MMR-N/A	Same; Army would adhere to current SOPs, where applicable and with funding availability

Key:

Same – means that the condition is assumed to include the same or similar provision/restriction as the current lease

N/A – means that the current lease provision/restriction would not apply

Table G-2: KTA: Additional Considerations	
Motocross Activities	
KTA Tract A-1, Motocross License/Use	Motocross activities may continue with the same likelihood under a State lease and Gov fee simple land retention scenario.

Table G-3: MMR: Additional Considerations	
Settlement Agreement—Mālama Mākua vs. Rumsfeld (2001)	
Settlement Agreement—completion of archaeological surveys and marine studies; prohibition of live fire; provision for community observers	Ongoing allowance of community observers party to the settlement agreement including Mālama Mākua and Waianae Coast community members

Current [1964] Leases

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STATE OF HAWAII
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STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE GENERAL LEASE NO. S-3850
U. S. LEASE, CONTRACT NO. DA-94-626-ENG-77

1. THIS LEASE, made and entered into this 17th day of August, in the year one thousand nine hundred and sixty-four by and between the STATE OF HAWAII, represented by its Board of Land and Natural Resources, whose address is P. O. Box 621, Honolulu, Hawaii 96809, and whose interest in the property hereinafter described is that of fee simple owner, for itself, its administrators, successors, and assigns, hereinafter called the "Lessor", and THE UNITED STATES OF AMERICA, hereinafter called the "Government":

WITNESSETH: The parties hereto for the consideration hereinafter mentioned covenant and agree as follows:

2. The Lessor hereby leases to the Government two (2) parcels of land described on Exhibit "A" attached hereto and hereby made a part hereof, all to be used for the following purpose: Military purposes.

3. TO HAVE AND TO HOLD the said premises for a term of sixty-five (65) years beginning August 17, 1964 and ending August 16, 2029; subject, however, to the rights of the Lessor and the Government respectively to terminate this lease in accordance with provisions 6 and 19 hereof.

4. The Government shall pay the Lessor rent at the following rate: ONE DOLLAR ($1.00) for the term of the lease, the receipt and sufficiency whereof is hereby acknowledged.

5. The Government shall have the right, during the existence of this lease, to attach fixtures, and erect structures or signs, in or upon the premises hereby leased, which fixtures and structures or signs, so placed in, upon or attached to the said premises shall be and remain the property of the Government and may be removed or otherwise disposed of by the Government. In addition, the Government shall post and maintain signs on roads and trails entering dangerous areas to provide a warning of any dangerous or hazardous activities; provided, that the information placed on the posted signs anywhere within the demised premises shall not be incompatible with the terms of this lease and, in those instances where joint use of an area is permitted, the information placed on the signs may include the permitted joint activities.

6. The Government may terminate this lease at any time by giving thirty (30) days' notice in writing to the Lessor.

7. The rights herein granted to the Government for use of the above-described Parcel 1 are subject to grazing rights held by J. J. Cambra, Jr., under Revocable Permit No. 868 dated 28 April 1963; consequently, the Government shall exercise caution when firing in Parcel 1. In addition, the Lessor reserves the right to outlease joint use of Parcel 1 hereof for grazing purposes; provided, however, that the Lessor hereby agrees to cancel any such grazing lease within sixty (60) days after receipt of written notice from the Government that grazing activities on the premises are contributing to excessive erosion or are seriously interfering with training activities.

8. The Lessor will not be responsible for any loss, liability, claim, or demand for property damage, property loss, or personal injury, including but not limited to death, arising out of any injury or damage caused by or resulting from any act or omission of the Federal Government in connection with the Federal Government's use of the premises described herein.

9. In recognition of public use of the demised premises, the Government shall make every reasonable effort to stockpile supplies and equipment in an orderly fashion and away from established roads and hiking trails and to remove or deactivate all live or blank ammunition upon completion of a training exercise or prior to entry by the said public, whichever is sooner.

10. The Government shall obtain the written consent of the Lessor prior to constructing any road or

building of the type for which design and construction plans are normally required; provided, however, that such consent shall not be arbitrarily withheld. The Government agrees that its training roads which provide primary access within or across the demised premises will be maintained to normal standards for training area roads with due regard for preventing unnecessary erosion; provided, however, that the Government shall be under no obligation to maintain roads during periods when the necessary engineer troops are absent from Oahu.

11. The Government shall take every reasonable precaution to prevent the start of any fire in the areas herein demised and shall take immediate and continuing action to extinguish any and all fires started by or resulting from Government activities. Further, the Government shall establish and at all times maintain a standard operating procedure for fighting fires within or adjacent to the subject leased property resulting from Government training activities during its use and occupancy of the premises; provided, further, that Government personnel actually using the premises shall be familiar with said standard procedure including the means of implementation.

12. In recognition of the limited amount of land available for public use, of the importance of forest reserves and watersheds in Hawaii, and of the necessity for preventing or controlling erosion, the Government hereby agrees that, commensurate with training activities, it will take reasonable action during its use of the premises herein demised to prevent

unnecessary damage to or destruction of vegetation, wild life and forest cover, geological features and related natural resources and improvements constructed by the Lessor, help preserve the natural beauty of the premises, avoid pollution or contamination of all ground and surface waters and remove or bury all trash, garbage and other waste materials resulting from Government use of the said premises.

13. Except as required for defense purposes in times of national emergency, the Government shall not deliberately appropriate, damage, remove, excavate, disfigure, deface or destroy any object of antiquity, prehistoric ruin or monument.

14. In the event at some future date it is deemed necessary by the Lessor to use ground or surface water on the premises herein demised as a source of public water supply, the area providing said ground or surface water shall be withdrawn from military use upon request of the Lessor and with the Government's concurrence.

15. The Government shall not use any portion of the demised premises as an impact area for explosive or incendiary munitions of any type and shall limit firing on the premises to weapons not larger than .50 caliber provided, however, the Government may also fire inert 3.5-inch rockets or weapons of similar size or purpose as long as such training will not cause fires.

16. When the demised premises or any part thereof is not scheduled for Government training purposes from dusk Friday to midnight Sunday and from dawn to midnight on national holidays, the said premises shall be available to the Lessor which may open them to the general public who shall be subject to the laws of the State of Hawaii during their

presence on the premises which shall be for such limited or unlimited purposes as may be designated by the Lessor; provided, that the Lessor may declare the whole or any portion of the demised premises during such open periods as a public shooting or fishing ground, and the Lessor shall have the right to issue written permits to hunters and fishermen, subject to rules and regulations issued by the said Lessor; and, provided further, however, that permitted hunting and fishing activities shall be coordinated with the training activities of the Government on the demised premises and the Lessor shall obtain from such permittees written releases which will hold the Government and the Lessor harmless from any accidental injuries or deaths suffered by the holders of such permits; and, provided still further, that the Government shall make an effort to schedule its training exercises in such a manner as to enable the general public to use the subject area during the periods hereinabove mentioned and shall publish a notice in two papers of general circulation at least three (3) days prior to each said weekend or holiday on which the premises or any portion thereof will be used for training exercises except when prohibited therefrom by overriding military contingencies. The Government shall not be responsible for the control or safety of the general public, nor shall the Government be responsible for the correction of unsanitary conditions due to general public use of the demised premises.

17. The Lessor hereby agrees that, commensurate with the public use of the premises herein demised, it will take reasonable action during the use of the said premises by the general public; to remove or bury trash, garbage and other waste material resulting from use of the said premises by the general public.

18. The Lessor shall have the right to erect signs and construct capital improvements within the leased property at locations mutually agreed upon by the parties hereto, in connection with water conservation, public water consumption, forestry, recreational and related purposes, said capital improvements including but not limited in any way to the construction, maintenance and/or improvements of roads and trails; provided, however, that notwithstanding any other provisions of this lease to the contrary, the Government hereby accepts the responsibility and liability for repairs of any damage which can be demonstrated to have been the direct result of military activities, to improvements constructed by the Lessor subsequent to the date of this lease.

19. In the event that the leased property is not used by the Government for a period of three (3) consecutive years, this lease may be terminated upon ninety (90) days' written notice from the Lessor to the Government, provided, however, that if prior to the expiration of the aforesaid 90-day period the Secretary of the Army shall find and determine that the leased property is required for military purposes and shall notify the Lessor in writing of this finding and determination, this lease will continue in effect; provided, further, that periods during which a national emergency has been declared by the President or the Congress of the United States and periods during which major combat elements are temporarily deployed away from the State of Hawaii shall not be included in the said three-year period. During such period of temporary deployment the parties hereto shall discuss and give consideration to and provide for

the additional public use of the demised premises compatible with then existing military training requirements. The Government will assure that current military standards concerning adequate utilization are applied to these premises and will assure that such use is known and is a matter of record and available to the Lessor upon request.

20. Subject to obtaining advance clearance from the plans and training office of the Government's controlling agency, or any other designated Government agency, officials and employees of the Lessor and any person or persons duly authorized by the Lessor shall have the right to enter upon the demised premises at all reasonable times to conduct any operations that will not unduly interfere with activities of the Government under the terms of this lease; provided, however, that such advance clearance shall not be unreasonably withheld.

21. All persons legally entitled under the provisions of this lease to be on the said premises shall have a nonexclusive right to use all Government roads and trails except when such use will interfere with the training activities of the Government or said roads and trails have been restricted, by a duly posted sign, as security or danger areas by the Government.

22. The Lessor reserves unto itself all ground and surface water, ores, minerals and mineral rights of every description on, in or under the demised premises but shall exploit or permit others to exploit the said ores, minerals and mineral rights only with the consent of the Government. Notwithstanding the foregoing reservation, the Government shall have the right to develop and use for road construction projects on the demised premises sources of coral, rock and similar

materials occurring naturally on the said premises and to use said ground and surface waters for purposes incident to the rights granted by this lease.

23. The Government will not be responsible for any loss, liability, claim or demand for any property damage, property loss, or personal injury, including but not limited to death, arising out of injury or damage caused by or resulting from any act or omission of the Lessor or the general public in connection with their use of the premises described herein.

24. Any notice under the terms of this lease shall be in writing signed by a duly authorized representative of the party giving such notice, and if given by the Government shall be addressed to the Lessor at P. O. Box 621, Honolulu, Hawaii 96809, and if given by the Lessor shall be addressed to the Division Engineer, U. S. Army Engineer Division, Pacific Ocean, Building 96, Fort Armstrong, Honolulu, Hawaii, Attention: Real Estate Division, or at such location and to such other agency as may be mutually agreed upon by the parties hereto.

25. The Government hereby agrees that the use and enjoyment of the land herein demised shall not be in support of any policy which discriminates against anyone based upon race, creed or color.

26. The Government shall not grant any interest in the demised premises; provided, however, that the Government shall have the right to grant the use of portions of the premises for temporary activities of Governmental agencies or their contractors in which case any land rental derived from such use of the premises shall be covered into the Treasury of the State of Hawaii

27. Subject to obtaining the prior approval of the Government, the Lessor reserves the right to grant rights or privileges to others not inconsistent with the terms of this lease affecting the whole or any portion of the demised premises.

28. The Government agrees to reforest areas, as expeditiously as practicable and within a period mutually agreed upon, where it can be demonstrated that substantial forest cover, including trees, has been destroyed as a direct result of Government activities; provided, however, that the Lessor shall obtain advance Government approval of all future plantings proposed by the Lessor

29. The Government shall surrender possession of the premises upon the expiration or sooner termination of this lease and, if required by the Lessor, shall within sixty (60) days thereafter, or within such additional time as may be mutually agreed upon, remove its signs and other structures; provided that in lieu of removal of structures the Government may abandon them in place. The Government shall also remove weapons and shells used in connection with its training activities to the extent that a technical and economic capability exists and provided that expenditures for removal of shells will not exceed the fair market value of the land.

30. (a) That, except as otherwise provided in this lease, any dispute concerning a question of fact arising under this lease which is not disposed of by agreement shall be decided by the Division Engineer, U. S. Army Engineer Division, Pacific Ocean, Honolulu, Hawaii, hereinafter referred to as said officer, who shall within a reasonable time reduce his decision and the reasons therefor to writing and mail or otherwise furnish a copy thereof to the Lessor. The decision of

the said officer shall be final and conclusive unless, within thirty (30) days from the date of receipt of such copy, the Lessor mails or otherwise furnishes to the said officer a written appeal addressed to the Secretary of the Army. The decision of the Secretary or his duly authorized representative for the determination of such appeals shall be final and conclusive unless determined by a court of competent jurisdiction to have been fraudulent, or capricious, or arbitrary, or so grossly erroneous as necessarily to imply bad faith, or not supported by substantial evidence. In connection with any appeal proceeding under this condition, the Lessor shall be afforded an opportunity to be heard and to offer evidence in support of its appeal.

(b) This Condition does not preclude consideration of law questions in connection with decisions provided for in paragraph (a) above; provided, that nothing in this Condition shall be construed as making final the decision of any administrative official, representative, or board on a question of law.

(c) That all appeals under this provision shall be processed expeditiously.

31. The Government's compliance with all obligations placed on it by this lease shall be subject to the availability of funds.

32. The Lessor's compliance with any obligations which may be placed on it by this lease shall be subject to the availability of funds and/or personnel.

33. The Lessor warrants that no person or selling agency has been employed or retained to solicit or secure this lease upon an agreement or understanding for a commission, percentage, brokerage, or contingent fee, excepting bona fide

employees or bona fide established commercial or selling agencies maintained by the Lessor for the purposes of securing business. For breach or violation of this warranty the Government shall have the right to annul this lease without liability or in its discretion to deduct from the lease price or consideration the full amount of such commission, percentage, brokerage, or contingent fee.

34. No member of or delegate to Congress or resident commissioner shall be admitted to any share or part of this lease or to any benefit that may arise therefrom, but this provision shall not be construed to extend to this lease if made with a corporation for its general benefit.

35. (a) The Government may, by written notice to the Lessor, terminate the right of the Lessor to proceed under this lease if it is found, after notice and hearing, by the Secretary of the Army or his duly authorized representative, that gratuities (in the form of entertainment, gifts, or otherwise) were offered or given by the Lessor, or any agent or representative of the Lessor, to any officer or employee of the Government with a view toward securing a lease or securing favorable treatment with respect to the awarding or amending, or the making of any determinations with respect to the performing of such lease; provided that the existence of facts upon which the Secretary of the Army or his duly authorized representative makes such findings shall be in issue and may be reviewed in any competent court.

(b) In the event this lease is terminated as provided in paragraph (a) hereof, the Government shall be entitled (i) to pursue the same remedies against the Lessor

as it could pursue in the event of a breach of the lease by the Lessor, and (ii) as a penalty in addition to any other damages to which it may be entitled by law, to exemplary damages in an amount (as determined by the Secretary of the Army or his duly authorized representative) which shall be not less than three or more than ten times the costs incurred by the Lessor in providing any such gratuities to any such officer or employee.

(c) The rights and remedies of the Government provided in this clause shall not be exclusive and are in addition to any other rights and remedies provided by law or under this lease.

36. This lease is not subject to Title 10, United States Code, Section 2662.

IN WITNESS WHEREOF, the parties hereto have hereunto subscribed their names as of the date first above written.

STATE OF HAWAII

By _____
Chairman and Member
Board of Land and Natural
Resources

And By _____
Member
Board of Land and Natural
Resources

THE UNITED STATES OF AMERICA

By _____
Eugene H. Merrill
Deputy Assistant Secretary of the Army (I&L)
(Installations)

APPROVED AS TO FORM:

_____
Bert T. Kobayashi
Attorney General
State of Hawaii

_____

STATE OF VIRGINIA)
) SS
COUNTY OF ARLINGTON)

On this 17th day of August, 1964, before me appeared Eugene H. Merrill, to me personally known who, being by me duly sworn, did say that he is the DEPUTY ASSISTANT SECRETARY OF ARMY (I&L) - Installations, and that the seal affixed to said instrument is the seal of the Department of the Army and that the said instrument was signed and sealed in behalf of said United States of America under the authority therein mentioned, and said Eugene H. Merrill acknowledged said instrument to be the free act and deed of said United States of America.

In witness whereof I have hereunto set my hand and official seal.

My Commission Expires November 6, 1966

Howard V. Kempter
NOTARY PUBLIC
Arlington County, Virginia

FORM 314 Certificate of Official Character.

Commonwealth of Virginia)
) to wit:
County of Arlington)

I, H. BRUCE GREEN, Clerk of the Circuit Court of the County aforesaid in the State of Virginia, the same being a Court of record, do certify that Howard V. Kempter, whose genuine signature is attached to the foregoing certificate is, and was at the time of signing the same, a Notary Public in and for the said County, duly commissioned and qualified, residing in said County and duly authorized, by virtue of his office, to take acknowledgements to deeds and other writings, and to administer oaths under the laws of this State. I further certify that the official acts of the said Howard V. Kempter are entitled to full faith and credit; that I am well acquainted with the handwriting of the said Howard V. Kempter and verily believe his signature to the foregoing proof or acknowledgment to be genuine; and that his attestation is in due form of law. I further certify that the laws of Virginia do not require the imprint of the Notary's seal to be filed with the authenticating officer.

In testimony whereof I have hereunto set my hand and affixed the seal of the said Court this

EXHIBIT "A"

KAHUKU TRAINING AREA

PARCEL 1

A parcel of land situate at Waialee and Pahipahialua, Koolauloa, Oahu, Hawaii, and being the mauka portion of the Government (Crown) Land of Waialee and a portion of the land of Pahipahialua (R.P. 5688, L.C.Aw. 8559-B, Apana 37 Part 1 to W. C. Lunalilo), conveyed to the Territory of Hawaii by Trustees of the Estate of James Campbell by deed dated May 19, 1910, recorded in Book 327 on Page 464. (Land Office Deed 1651.)

Beginning at a pipe in concrete marked 22 at the west corner of this parcel of land and at the top of the pali on the west side of Kupahu Gulch, on the boundary between the lands of Waialee and Kaunala, and at the end of Course 7 of Land Court Application 1095, the coordinates of said point of beginning referred to Government Survey Triangulation Station "Waialee" being 435.25 feet South and 2,395.43 feet West, and running by azimuths measured clockwise from true South:

1.	246°	51'		555.6 feet	across Kupahu Gulch to the top of the pali on the east side of Kupahu Gulch;
					Thence along the top edge of the pali to the boundary between the lands of Waialee and Pahipahialua, the traverse between points on the top edge of said pali being:
2.	246°	51'		500.0 feet	to a pipe;
3.	242°	48'		714.90 feet	to a pipe;
4.	227°	23'		603.20 feet	to a pipe;
5.	237°	04'		174.70 feet	to a pipe;
6.	272°	09'		305.70 feet	to a pipe;
7.	297°	09'	30"	253.60 feet	to a pipe;
8.	218°	32'		1,541.22 feet	to the boundary between the lands of Waialee and Pahipahialua;
9.	335°	23'		400.00 feet	along the land of Pahipahialua (Land Court Application 1095);
10.	254°	05'		248.90 feet	along the land of Pahipahialua (Land Court Application 1095);

11.	346°	58'	896.30 feet	along the land of Pahipahialua (Land Court Application 1095);
12.	346°	19'	1,757.20 feet	along the land of Pahipahialua (Land Court Application 1095) to a pipe in concrete marked 5;
13.	344°	27'	1,312.00 feet	along the land of Pahipahialua (Land Court Application 1095);
14.	253°	48'	213.50 feet	along portion of the land of Pahipahialua (Land Court Application 1095);
15.	344°	33'	1,329.30 feet	along portion of the land of Pahipahialua (Land Court Application 1095);
16.	59°	59'	252.90 feet	along portion of the land of Pahipahialua (Land Court Application 1095);
17.	346°	55'	270.60 feet	along the land of Pahipahialua (Land Court Application 1095);
18.	337°	16'	808.20 feet	along the land of Pahipahialua (Land Court Application 1095);
19.	55°	45'	583.00 feet	along Grant 5277 to Trustees of the Estate of James Campbell (Land Court Application 1095);
20.	113°	45'	219.00 feet	along Grant 5277 to Trustees of the Estate of James Campbell (Land Court Application 1095);
21.	161°	55'	456.00 feet	along Grant 5277 to Trustees of the Estate of James Campbell (Land Court Application 1095);
22.	116°	00'	341.00 feet	along Grant 5277 to Trustees of the Estate of James Campbell (Land Court Application 1095);
23.	166°	10'	273.00 feet	along Grant 5277 to Trustees of the Estate of James Campbell (Land Court Application 1095);

24.	30°	57'	1,136.50 feet	along Grant 5277 to Trustees of the Estate of James Campbell (Land Court Application 1095), to a pipe in concrete marked 17 on the boundary between the lands of Waialee and Kaunala;
25.	135°	33'	3,759.00 feet	along the land of Kaunala (Land Court Application 1095);
26.	134°	14'	1,623.00 feet	along the land of Kaunala (Land Court Application 1095);
27.	152°	04'	365.00 feet	along the land of Kaunala (Land Court Application 1095);
28.	170°	26'	322.30 feet	along the land of Kaunala (Land Court Application 1095);
29.	193°	06'	86.10 feet	along the land of Kaunala (Land Court Application 1095) to the point of beginning and containing an AREA OF 449.72 ACRES, more or less; together with a perpetual, assignable easement and a right-of-way to use, maintain and repair the existing access road across adjoining ceded land of the State of Hawaii.

PARCEL 2

A parcel of land situated at Koolauloa, Oahu, Hawaii.

Beginning at an inch pipe on a hill in the ridge bounding the lands of Paumalu and Kaunala and at the East corner of Lot 23 of the Pupukea-Paumalu Homesteads, from which pipe the true azimuth and distance to Government Survey Trig. Station "Waialee" is 162° 43' 30" 10244.0 feet, as shown on Government Survey Registered Map No. 2252, and running by true azimuths;

1. Up along the ridge along the land of Kaunala to "Puu Moa" a point in the ridge at the head of the Paumalu Gulch, the direct azimuth and distance being: 328° 00' 6785.0 feet;

2. Thence down the ridge along the land of Waimea to "Puu Ki" a point in the ridge at the head of the land of Pupukea, the direct azimuth and distance being: 86° 10' 6660.0 feet;

3.	162°	00'	500.00 feet	along the remainder of Pupukea-Paumalu Forest Reserve to the center of Kaleleiki Stream;

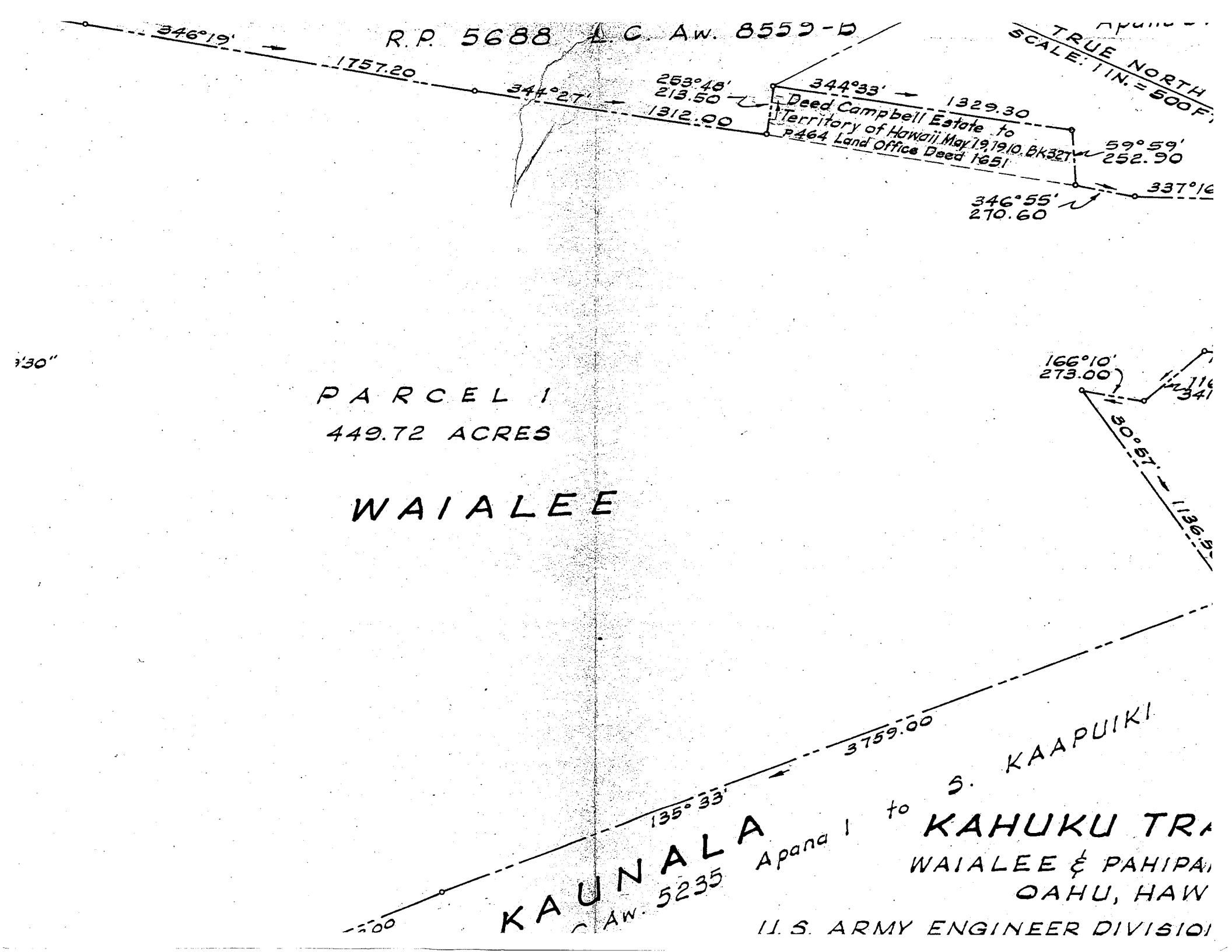
4. Thence along the center of Kaleleiki Stream to the boundary of Lot 21 of Pupukea-Paumalu Homesteads, the direct azimuth and distance being: 159° 30' 4117.00 feet;

5. 275° 30' 507.00 feet along Lot 21 of Pupukea-Paumalu Homesteads to an iron pipe;

6. 219° 37' 300.00 feet along same to an iron pipe;

7. 270° 01' 30" 2,218.00 feet along same down bluff to the center of the Paumalu Stream, and up bluff along Lot 22 to an iron pipe;

8. 225° 46' 2,417.00 feet along Lots 22 and 23 and across the Aimuu Gulch to the point of beginning and containing an AREA OF 700 ACRES, more or less.


R.P. 5688 L.C. Aw. 8559-B
346°19'
1757.20
347°27'
1312.00
253°48'
213.50
344°33'
1329.30
Deed Campbell Estate to
Territory of Hawaii May 19, 1910. Bk 327
P 464 Land Office Deed 1651
59°59'
252.90
346°55'
270.60
TRUE NORTH
SCALE: 1 IN. = 500 F
166°10'
273.00
30°57'
135°33'
3759.00
PARCEL 1
449.72 ACRES
WAIALEE
KAUNALA
Apana 1
to
S. KAAPUIKI
KAHUKU TR
WAIALEE & PAHIPA
OAHU, HAW
U.S. ARMY ENGINEER DIVISIO
Aw. 5235

RECORDATION REQUESTED BY:
U. S. Army Engineer Division,
Pacific Ocean

AFTER RECORDATION, RETURN TO:
U. S. Army Engineer Division,
Pacific Ocean
Phone: 542986

STATE OF HAWAII
BUREAU OF CONVEYANCES
RECEIVED FOR RECORD

LIBER 4821 PAGES 394 THRU 408

'64 AUG 20 PM 1:37
/s/ M. Adachi
REGISTRAR

INDEXED /i/ EK

RETURN BY: MAIL ( ) PICKUP (X)

SPACE ABOVE THIS LINE FOR
REGISTRAR'S USE

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE GENERAL LEASE NO. S-3846
U. S. LEASE, CONTRACT NO. DA-94-626-ENG-78

1. THIS LEASE, made and entered into this 17th day of August, in the year one thousand nine hundred and sixty-four by and between the STATE OF HAWAII, represented by its Board of Land and Natural Resources, whose address is P. O. Box 621, Honolulu, Hawaii 96809, and whose interest in the property hereinafter described is that of fee simple owner, for itself, its administrators, successors, and assigns, hereinafter called the "Lessor", and THE UNITED STATES OF AMERICA, hereinafter called the "Government":

WITNESSETH: The parties hereto for the consideration hereinafter mentioned covenant and agree as follows:

2. The Lessor hereby leases to the Government a parcel of land described on Exhibit "A" attached hereto and hereby made a part hereof, all to be used for the following purpose: Military purposes.

3. TO HAVE AND TO HOLD the said premises for a term of sixty-five (65) years beginning August 17, 1964 and ending August 16, 2029; subject, however, to the rights of the Lessor and the Government respectively to terminate this lease in accordance with provisions 6 and 19 hereof.

Had 100

KAWAILOA

4. The Government shall pay the Lessor rent at the following rate: ONE DOLLAR ($1.00) for the term of the lease, the receipt and sufficiency whereof is hereby acknowledged.

5. The Government shall have the right, during the existence of this lease, to attach fixtures, and erect structures or signs, in or upon the premises hereby leased, which fixtures and structures or signs, so placed in, upon or attached to the said premises shall be and remain the property of the Government and may be removed or otherwise disposed of by the Government. In addition, the Government shall post and maintain signs on roads and trails entering dangerous areas to provide a warning of any dangerous or hazardous activities; provided, that the information placed on the posted signs anywhere within the demised premises shall not be incompatible with the terms of this lease and, in those instances where joint use of an area is permitted, the information placed on the signs may include the permitted joint activities.

6. The Government may terminate this lease at any time by giving thirty (30) days' notice in writing to the Lessor.

7. This lease is subject to that certain Water License dated March 5, 1951, issued to Castle & Cooke, Inc.

8. The Lessor will not be responsible for any loss, liability, claim, or demand for property damage, property loss, or personal injury, including but not limited to death, arising out of any injury or damage caused by or resulting from any act or omission of the Federal Government in connection with the Federal Government's use of the premises described herein.

9. In recognition of public use of the demised premises, the Government shall make every reasonable effort to stockpile supplies and equipment in an orderly fashion and

away from established roads and hiking trails and to remove or deactivate all live or blank ammunition upon completion of a training exercise or prior to entry by the said public, whichever is sooner.

10. The Government shall obtain the written consent of the Lessor prior to constructing any road or building of the type for which design and construction plans are normally required; provided, however, that such consent shall not be arbitrarily withheld. The Government agrees that its training roads which provide primary access within or across the demised premises will be maintained to normal standards for training area roads with due regard for preventing unnecessary erosion; provided, however, that the Government shall be under no obligation to maintain roads during periods when the necessary engineer troops are absent from Oahu.

11. The Government shall take every reasonable precaution to prevent the start of any fire in the areas herein demised and shall take immediate and continuing action to extinguish any and all fires started by or resulting from Government activities. Further, the Government shall establish and at all times maintain a standard operating procedure for fighting fires within or adjacent to the subject leased property resulting from Government training activities during its use and occupancy of the premises; provided, further, that Government personnel actually using the premises shall be familiar with said standard procedure including the means of implementation.

12. In recognition of the limited amount of land available for public use, of the importance of forest reserves and watersheds in Hawaii, and of the necessity for preventing or controlling erosion, the Government hereby agrees that, commensurate with training activities, it will take reasonable

action during its use of the premises herein demised to prevent unnecessary damage to or destruction of vegetation, wild life and forest cover, geological features and related natural resources and improvements constructed by the Lessor, help preserve the natural beauty of the premises, avoid pollution or contamination of all ground and surface waters and remove or bury all trash, garbage and other waste materials resulting from Government use of the said premises.

13. Except as required for defense purposes in times of national emergency, the Government shall not deliberately appropriate, damage, remove, excavate, disfigure, deface or destroy any object of antiquity, prehistoric ruin or monument.

14. In the event at some future date it is deemed necessary by the Lessor to use ground or surface water on the premises herein demised as a source of public water supply, the area providing said ground or surface water shall be withdrawn from military use upon request of the Lessor and with the Government's concurrence.

15. The Government shall not use any portion of the demised premises as an impact area for explosive or incendiary munitions of any type and shall limit firing on the premises to weapons not larger than .50 caliber provided, however, the Government may also fire inert 3.5-inch rockets or weapons of similar size or purpose as long as such training will not cause fires.

16. When the demised premises or any part thereof is not scheduled for Government training purposes from dusk Friday to midnight Sunday and from dawn to midnight on national holidays, the said premises shall be available to the Lessor which may open them to the general public who shall be subject to the laws of the State of Hawaii during their

presence on the premises which shall be for such limited or unlimited purposes as may be designated by the Lessor; provided, that the Lessor may declare the whole or any portion of the demised premises during such open periods as a public shooting or fishing ground, and the Lessor shall have the right to issue written permits to hunters and fishermen, subject to rules and regulations issued by the said Lessor; and, provided further, however, that permitted hunting and fishing activities shall be coordinated with the training activities of the Government on the demised premises and the Lessor shall obtain from such permittees written releases which will hold the Government and the Lessor harmless from any accidental injuries or deaths suffered by the holders of such permits; and, provided still further, that the Government shall make an effort to schedule its training exercises in such a manner as to enable the general public to use the subject area during the periods hereinabove mentioned and shall publish a notice in two papers of general circulation at least three (3) days prior to each said weekend or holiday on which the premises or any portion thereof will be used for training exercises except when prohibited therefrom by overriding military contingencies. The Government shall not be responsible for the control or safety of the general public, nor shall the Government be responsible for the correction of unsanitary conditions due to general public use of the demised premises.

17. The Lessor hereby agrees that, commensurate with the public use of the premises herein demised, it will take reasonable action during the use of the said premises by the general public; to remove or bury trash, garbage and other waste material resulting from use of the said premises by the general public.

18. The Lessor shall have the right to erect signs and construct capital improvements within the leased property at locations mutually agreed upon by the parties hereto, in connection with water conservation, public water consumption, forestry, recreational and related purposes, said capital improvements including but not limited in any way to the construction, maintenance and/or improvements of roads and trails; provided, however, that notwithstanding any other provisions of this lease to the contrary, the Government hereby accepts the responsibility and liability for repairs of any damage which can be demonstrated to have been the direct result of military activities, to improvements constructed by the Lessor subsequent to the date of this lease.

19. In the event that the leased property is not used by the Government for a period of three (3) consecutive years, this lease may be terminated upon ninety (90) days' written notice from the Lessor to the Government, provided, however, that if prior to the expiration of the aforesaid 90-day period the Secretary of the Army shall find and determine that the leased property is required for military purposes and shall notify the Lessor in writing of this finding and determination, this lease will continue in effect; provided, further, that periods during which a national emergency has been declared by the President or the Congress of the United States and periods during which major combat elements are temporarily deployed away from the State of Hawaii shall not be included in the said three-year period. During such period of temporary deployment the parties hereto shall discuss and give consideration to and provide for

the additional public use of the demised premises compatible with then existing military training requirements. The Government will assure that current military standards concerning adequate utilization are applied to these premises and will assure that such use is known and is a matter of record and available to the Lessor upon request.

20. Subject to obtaining advance clearance from the plans and training office of the Government's controlling agency, or any other designated Government agency, officials and employees of the Lessor and any person or persons duly authorized by the Lessor shall have the right to enter upon the demised premises at all reasonable times to conduct any operations that will not unduly interfere with activities of the Government under the terms of this lease; provided, however, that such advance clearance shall not be unreasonably withheld.

21. All persons legally entitled under the provisions of this lease to be on the said premises shall have a nonexclusive right to use all Government roads and trails except when such use will interfere with the training activities of the Government or said roads and trails have been restricted, by a duly posted sign, as security or danger areas by the Government.

22. The Lessor reserves unto itself all ground and surface water, ores, minerals and mineral rights of every description on, in or under the demised premises but shall exploit or permit others to exploit the said ores, minerals and mineral rights only with the consent of the Government. Notwithstanding the foregoing reservation, the Government shall have the right to develop and use for road construction projects on the demised premises sources of coral, rock and similar

materials occurring naturally on the said premises and to use said ground and surface waters for purposes incident to the rights granted by this lease.

23. The Government will not be responsible for any loss, liability, claim or demand for any property damage, property loss, or personal injury, including but not limited to death, arising out of injury or damage caused by or resulting from any act or omission of the Lessor or the general public in connection with their use of the premises described herein.

24. Any notice under the terms of this lease shall be in writing signed by a duly authorized representative of the party giving such notice, and if given by the Government shall be addressed to the Lessor at P. O. Box 621, Honolulu, Hawaii 96809, and if given by the Lessor shall be addressed to the Division Engineer, U. S. Army Engineer Division, Pacific Ocean, Building 96, Fort Armstrong, Honolulu, Hawaii, Attention: Real Estate Division, or at such location and to such other agency as may be mutually agreed upon by the parties hereto.

25. The Government hereby agrees that the use and enjoyment of the land herein demised shall not be in support of any policy which discriminates against anyone based upon race, creed or color.

26. The Government shall not grant any interest in the demised premises; provided, however, that the Government shall have the right to grant the use of portions of the premises for temporary activities of Governmental agencies or their contractors in which case any land rental derived from such use of the premises shall be covered into the Treasury of the State of Hawaii

27. Subject to obtaining the prior approval of the Government, the Lessor reserves the right to grant rights or privileges to others not inconsistent with the terms of this lease affecting the whole or any portion of the demised premises.

28. The Government agrees to reforest areas, as expeditiously as practicable and within a period mutually agreed upon, where it can be demonstrated that substantial forest cover, including trees, has been destroyed as a direct result of Government activities; provided, however, that the Lessor shall obtain advance Government approval of all future plantings proposed by the Lessor

29. The Government shall surrender possession of the premises upon the expiration or sooner termination of this lease and, if required by the Lessor, shall within sixty (60) days thereafter, or within such additional time as may be mutually agreed upon, remove its signs and other structures; provided that in lieu of removal of structures the Government may abandon them in place. The Government shall also remove weapons and shells used in connection with its training activities to the extent that a technical and economic capability exists and provided that expenditures for removal of shells will not exceed the fair market value of the land.

30. (a) That, except as otherwise provided in this lease, any dispute concerning a question of fact arising under this lease which is not disposed of by agreement shall be decided by the Division Engineer, U. S. Army Engineer Division, Pacific Ocean, Honolulu, Hawaii, hereinafter referred to as said officer, who shall within a reasonable time reduce his decision and the reasons therefor to writing and mail or otherwise furnish a copy thereof to the Lessor. The decision of

the said officer shall be final and conclusive unless, within thirty (30) days from the date of receipt of such copy, the Lessor mails or otherwise furnishes to the said officer a written appeal addressed to the Secretary of the Army. The decision of the Secretary or his duly authorized representative for the determination of such appeals shall be final and conclusive unless determined by a court of competent jurisdiction to have been fraudulent, or capricious, or arbitrary, or so grossly erroneous as necessarily to imply bad faith, or not supported by substantial evidence. In connection with any appeal proceeding under this condition, the Lessor shall be afforded an opportunity to be heard and to offer evidence in support of its appeal.

(b) This Condition does not preclude consideration of law questions in connection with decisions provided for in paragraph (a) above; provided, that nothing in this Condition shall be construed as making final the decision of any administrative official, representative, or board on a question of law.

(c) That all appeals under this provision shall be processed expeditiously.

31. The Government's compliance with all obligations placed on it by this lease shall be subject to the availability of funds.

32. The Lessor's compliance with any obligations which may be placed on it by this lease shall be subject to the availability of funds and/or personnel.

33. The Lessor warrants that no person or selling agency has been employed or retained to solicit or secure this lease upon an agreement or understanding for a commission, percentage, brokerage, or contingent fee, excepting bona fide

employees or bona fide established commercial or selling agencies maintained by the Lessor for the purposes of securing business. For breach or violation of this warranty the Government shall have the right to annul this lease without liability or in its discretion to deduct from the lease price or consideration the full amount of such commission, percentage, brokerage, or contingent fee.

34. No member of or delegate to Congress or resident commissioner shall be admitted to any share or part of this lease or to any benefit that may arise therefrom, but this provision shall not be construed to extend to this lease if made with a corporation for its general benefit.

35. (a) The Government may, by written notice to the Lessor, terminate the right of the Lessor to proceed under this lease if it is found, after notice and hearing, by the Secretary of the Army or his duly authorized representative, that gratuities (in the form of entertainment, gifts, or otherwise) were offered or given by the Lessor, or any agent or representative of the Lessor, to any officer or employee of the Government with a view toward securing a lease or securing favorable treatment with respect to the awarding or amending, or the making of any determinations with respect to the performing of such lease; provided that the existence of facts upon which the Secretary of the Army or his duly authorized representative makes such findings shall be in issue and may be reviewed in any competent court.

(b) In the event this lease is terminated as provided in paragraph (a) hereof, the Government shall be entitled (i) to pursue the same remedies against the Lessor

as it could pursue in the event of a breach of the lease by the Lessor, and (ii) as a penalty in addition to any other damages to which it may be entitled by law, to exemplary damages in an amount (as determined by the Secretary of the Army or his duly authorized representative) which shall be not less than three or more than ten times the costs incurred by the Lessor in providing any such gratuities to any such officer or employee.

(c) The rights and remedies of the Government provided in this clause shall not be exclusive and are in addition to any other rights and remedies provided by law or under this lease.

36. This lease is not subject to Title 10, United States Code, Section 2662.

IN WITNESS WHEREOF, the parties hereto have hereunto subscribed their names as of the date first above written.

STATE OF HAWAII

By _____
Chairman and Member
Board of Land and Natural Resources

And By _____
Member
Board of Land and Natural Resources

THE UNITED STATES OF AMERICA

By _____
Eugene H. Merrill
Deputy Assistant Secretary of the Army (I&L)
(Installations)

APPROVED AS TO FORM:

_____
Bert T. Kobayashi
Attorney General
State of Hawaii

_____
Peter C. Lewis
Deputy Attorney General
State of Hawaii

STATE OF VIRGINIA)
) ss
COUNTY OF ARLINGTON)

On this 17th day of August, 1964, before me appeared Eugene H. Merrill, to me personally known who, being by me duly sworn, did say that he is the DEPUTY ASSISTANT SECRETARY OF ARMY (I&L)-Installations, and that the seal affixed to said instrument is the seal of the Department of the Army and that the said instrument was signed and sealed in behalf of said United States of America under the authority therein mentioned, and said Eugene H. Merrill acknowledged said instrument to be the free act and deed of said United States of America.

In witness whereof I have hereunto set my hand and official seal.

Howard V. Kempter
NOTARY PUBLIC
Arlington County, Virginia

My Commission Expires November 4, 1966

FORM 314 Certificate of Official Character.

Commonwealth of Virginia)
) to wit:
County of Arlington)

I, H. BRUCE GREEN, Clerk of the Circuit Court of the County aforesaid in the State of Virginia, the same being a Court of record, do certify that Howard V. Kempter, whose genuine signature is attached to the foregoing certificate is, and was at the time of signing the same, a Notary Public in and for the said County, duly commissioned and qualified, residing in said County and duly authorized, by virtue of his office, to take acknowledgements to deeds and other writings, and to administer oaths under the laws of this State. I further certify that the official acts of the said Howard V. Kempter are entitled to full faith and credit; that I am well acquainted with the handwriting of the said Howard V. Kempter and verily believe his signature to the foregoing proof or acknowledgment to be genuine; and that his attestation is in due form of law. I further certify that the laws of Virginia do not require the imprint of the Notary's seal to be filed with the authenticating officer.

In testimony whereof I have hereunto set my hand and affixed the seal of the said Court this 17th day of August, 1964, and in the 189th year of the Commonwealth.

H. Bruce Green, *Clerk.*

EXHIBIT "A"

KAWAILOA TRAINING AREA

PARCEL 1

Land situate at Wahiawa, Oahu, Hawaii, and being a portion of the Land of Wahiawa.

Beginning at U. S. Military Reservation Monument No. 54 at the southeast corner of this piece of land, the northeast corner of the crown land of Waianae-Uka, on the west boundary of the Ahupuaa of Kahana and at the junction of the spur ridge (which divides the land of Wahiawa and the Ahupuaa of Waianae) with the Koolau Range, thence running by azimuths measured clockwise from true South:

In a westerly direction along the top of the ridge between the lands of Wahiawa and Waianae-Uka (U. S. Military Reservation of Schofield Barracks, Presidential Executive Order No. 2800 dated February 4, 1918) for the first eleven courses, the direct azimuths and distances being:

1.	91°	02'	23"	6,172.1 feet	to U. S. Military Reservation Monument No. 53;
2.	86°	58'	47"	5,793.5 feet	to U. S. Military Reservation Monument No. 52;
3.	85°	30'	15"	9,325.2 feet	to U. S. Military Reservation Monument No. 51;
4.	94°	41'	42"	1,102.1 feet	to U. S. Military Reservation Monument No. 50;
5.	84°	44'	51"	696.7 feet	to U. S. Military Reservation No. 49;
6.	103°	01'	53"	964.8 feet	to U. S. Military Reservation No. 48;
7.	137°	23'	13"	347.7 feet	to U. S. Military Reservation Monument No. 47;
8.	85°	49'	16'	538.7 feet	to U. S. Military Reservation Monument No. 46;
9.	74°	44'	22"	266.8 feet	to U. S. Military Reservation Monument No. 45;
10.	60°	45'	55"	225.4 feet	to U. S. Military Reservation Monument No. 44;
11.	104°	36'	38"	472.0 feet	to U. S. Military Reservation Monument No. 43;
12.	205°	33'		4,800.0 feet	along the remainder of the Land of Wahiawa;
13.	118°	35'		4,010.0 feet	along the same;

14. Thence along the Ahupuaa of Paalaa, along the top of the dividing ridge between the Paalaa and Wahiawa Water Sheds to the summit of Koolau Range, the direct azimuth and distance being: 262° 11' 30" 22,301.6 feet;

15. Thence along the Ahupuaas of Punaluu and Kahana, along the summit of the Koolau Range in a southeasterly direction to the point of beginning and containing an AREA OF 4,390 ACRES, more or less.

64-26963

STATE OF HAWAII
BUREAU OF CONVEYANCES
RECEIVED FOR RECORD

LIBER 4821 PAGES 409 TO 424

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/s/ M. Adachi

INDEXED /i/ EK REGISTRAR

RECORDATION REQUESTED BY:

U. S. Army Engineer Division,
Pacific Ocean

AFTER RECORDATION, RETURN TO:

U. S. Army Engineer Division,
Pacific Ocean
Phone: 542986

RETURN BY: MAIL ( ) PICKUP (X)

SPACE ABOVE THIS LINE FOR REGISTRAR'S USE

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE GENERAL LEASE NO. S-3848
U. S. LEASE, CONTRACT NO. DA-94-626-ENG-79

1. THIS LEASE, made and entered into this 17th day of August, in the year one thousand nine hundred and sixty-four, by and between the STATE OF HAWAII, represented by its Board of Land and Natural Resources, whose address is P. O. Box 621, Honolulu, Hawaii, 96809, and whose interest in the property hereinafter described is that of fee simple owner, for itself, its administrators, successors, and assigns, hereinafter called the "Lessor", and THE UNITED STATES OF AMERICA, hereinafter called the "Government":

WITNESSETH: The parties hereto for the consideration hereinafter mentioned covenant and agree as follows:

2. The Lessor hereby leases to the Government two (2) parcels of land described on Exhibit "A" attached hereto and hereby made a part hereof, all to be used for the following purpose: Military purposes.

3. TO HAVE AND TO HOLD the said premises for a term of sixty-five (65) years beginning August 17, 1964, and ending August 16, 2029; subject, however, to the rights

of the Lessor and the Government respectively to terminate this lease in accordance with provisions 6 and 13 hereof.

4. The Government shall pay the Lessor rent at the following rate: ONE DOLLAR ($1.00) for the term of the lease, the receipt and sufficiency whereof is hereby acknowledged.

5. The Government shall have the right, during the existence of this lease, to attach fixtures, and erect structures or signs, in or upon the premises hereby leased, which fixtures and structures or signs, so placed in, upon or attached to the said premises shall be and remain the property of the Government and may be removed or otherwise disposed of by the Government. In addition, the Government shall post and maintain signs on roads and trails entering dangerous areas to provide a warning of any dangerous or hazardous activities; provided, that the information placed on the posted signs anywhere within the demised premises shall not be incompatible with the terms of this lease and, in those instances where joint use of an area is permitted, the information placed on the signs may include the permitted joint activities.

6. The Government may terminate this lease at any time by giving thirty (30) days' notice in writing to the Lessor.

7. The Lessor will not be responsible for any loss, liability, claim, or demand for property damage, property loss, or personal injury, including but not limited to death, arising out of any injury or damage caused by or resulting from any act or omission of the Federal Government in connection with the Federal Government's use of the premises described herein.

8. Except as otherwise provided herein, the Government shall have unrestricted control and use of the demised premises, including the right to fire all combat weapons therefrom into the designated Makua Impact Area; provided, however,

the Government shall not use any portion of the demised premises as an impact area for explosive or incendiary munitions of any type and, in recognition of public use of the demised premises, upon completion of a training exercise or prior to entry thereon by the general public, whichever is sooner, the Government shall make every reasonable effort to stockpile supplies and equipment in an orderly fashion and away from established roads or trails and to remove or deactivate all live or blank ammunition from the areas where the general public is permitted under the terms of this lease.

9. The Government shall obtain the written consent of the Lessor prior to constructing any road or building of the type for which design and construction plans are normally required; provided, however, that such consent shall not be arbitrarily withheld. The Government agrees that its training roads which provide primary access within or across the demised premises will be maintained to normal standards for training area roads with due regard for preventing unnecessary erosion; provided, however, that the Government shall be under no obligation to maintain roads during periods when the necessary engineer troops are absent from Oahu.

10. The Government shall take every reasonable precaution to prevent the start of any fire in the areas herein demised and shall take immediate and continuing action to extinguish any and all fires started by or resulting from Government activities. Further, the Government shall establish and at all times maintain a standard operating procedure for fighting fires within or adjacent to the subject leased property resulting from Government training activities during its use and occupancy of the premises; provided, further, that Government

personnel actually using the premises shall be familiar with said standard procedure including the means of implementation.

11. In recognition of the limited amount of land available for public use, of the importance of forest reserves and watersheds in Hawaii, and of the necessity for preventing or controlling erosion, the Government hereby agrees that, commensurate with training activities, it will take reasonable action during its use of the premises herein demised to prevent unnecessary damage to or destruction of vegetation, wildlife and forest cover, geological features and related natural resources and improvements constructed by the Lessor, help preserve the natural beauty of the premises, avoid pollution or contamination of all ground and surface waters and remove or bury all trash, garbage and other waste materials resulting from Government use of the said premises.

12. Except as required for defense purposes in times of national emergency, the Government shall not deliberately appropriate, damage, remove, excavate, disfigure, deface or destroy any object of antiquity, prehistoric ruin or monument.

13. In the event that the leased property is not used by the Government for a period of three (3) consecutive years, this lease may be terminated upon ninety (90) days' written notice from the Lessor to the Government, provided, however, that if prior to the expiration of the aforesaid 90-day period the Secretary of the Army shall find and determine that the leased property is required for military purposes and shall notify the Lessor in writing of this finding and determination, this lease will continue in effect; provided, further, that periods during which a national emergency has been declared by the President or the Congress of the United States and periods

during which major combat elements are temporarily deployed away from the State of Hawaii shall not be included in the said three-year period. During such period of temporary deployment the parties hereto shall discuss and give consideration to and provide for the additional public use of the demised premises compatible with then existing military training requirements. The Government will assure that current military standards concerning adequate utilization are applied to these premises and will assure that such use is known and is a matter of record and available to the Lessor upon request.

14. That portion of the demised premises situate between the ocean and the beach road (Farrington Highway extension) or any realignment thereof approved by the Government agency exercising control of the training area shall be fully available for use by the general public, except during periods when the public will interfere with training activities or training will endanger the said public, whereupon the Government shall publish a notice in two papers of general circulation at least three (3) days prior thereto except when prohibited therefrom due to overriding military contingencies, post necessary signs, other markings and/or guards, and shall have the right to restrict public use of the premises and to control traffic access over the said beach road during all periods of danger. In connection with such public use of the premises, the Lessor shall have the right to construct or place thereon public sanitary facilities, picnic tables, etc., provided that such construction is planned, sited and completed as agreed to by the local military commander having control and accountability of said leased premises, and, provided further, that notwithstanding any other provision of this lease to the

contrary, the Government hereby accepts the responsibility and liability for repairs of any damage which can be demonstrated to have been the direct result of military activities, to improvements constructed by the Lessor subsequent to the date of this lease; provided, however, that the Lessor shall be responsible for exercising proper control of the public during periods when public use is permitted and the Government shall have no liability for maintaining grounds used by the public except for removing any litter, refuse or trash resulting from Government activities.

15. The Lessor hereby agrees that, commensurate with the public use of the premises herein demised, it will take reasonable action during the use of the said premises by the general public, to remove or bury trash, garbage and other waste materials resulting from use of the said premises by the general public.

16. The Government shall have the right to fire over and maneuver across Farrington Highway and, in the interest of public safety, the right to interrupt traffic thereon during such training activities; provided, however, that the Government shall minimize interference with traffic by limiting stoppages thereof to 15-minute periods except when prohibited therefrom due to overriding military operations.

17. In connection with public use of the beach area, the Lessor shall also have the right to develop and use for public purposes Kaneana Cave, commonly called Makua Cave, together with an access foot trail thereto and a parking area adjacent to Farrington Highway.

18. Subject to obtaining advance clearance from the plans and training office of the Government's controlling agency,

or any other designated Government agency, officials and employees of the Lessor and any person or persons duly authorized by the Lessor shall have the right to enter upon the demised premises at all reasonable times to conduct any operations that will not unduly interfere with activities of the Government under the terms of this lease; provided, however, that such advance clearance shall not be unreasonably withheld.

19. All persons legally entitled under the provisions of this lease to be on the said premises shall have a nonexclusive right to use all Government roads and trails except when such use will interfere with the training activities of the Government or said roads and trails have been restricted, by a duly posted sign, as security or danger areas by the Government.

20. The Lessor reserves unto itself all ground and surface water, ores, minerals and mineral rights of every description on, in or under the demised premises but shall exploit or permit others to exploit the said ores, minerals and mineral rights only with the consent of the Government. Notwithstanding the foregoing reservation, the Government shall have the right to develop and use for road construction projects on the demised premises sources of coral, rock and similar materials occurring naturally on the said premises and to use said ground and surface waters for purposes incident to the rights granted by this lease.

21. The Government will not be responsible for any loss, liability, claim or demand for any property damage, property loss, or personal injury, including but not limited to death, arising out of injury or damage caused by or resulting from any act or omission of the Lessor or the general public in connection with their use of the premises described herein.

22. Any notice under the terms of this lease shall be in writing signed by a duly authorized representative of the party giving such notice, and if given by the Government shall be addressed to the Lessor at P. O. Box 621, Honolulu, Hawaii, 96809, and if given by the Lessor shall be addressed to the Division Engineer, U. S. Army Engineer Division, Pacific Ocean, Building 96, Fort Armstrong, Honolulu, Hawaii, Attention: Real Estate Division, or at such location and to such other agency as may be mutually agreed upon by the parties hereto.

23. The Government hereby agrees that the use and enjoyment of the land herein demised shall not be in support of any policy which discriminates against anyone based upon race, creed or color.

24. The Government shall not sublease or grant any interest in the demised premises; provided, however, that the Government shall have the right to grant the use of portions of the premises for temporary activities of Governmental agencies or their contractors in which case any land rental derived from such use of the premises shall be covered into the Treasury of the State of Hawaii.

25. Subject to obtaining the prior approval of the Government, the Lessor reserves the right to grant rights or privileges to others not inconsistent with the terms of this lease affecting the whole or any portion of the demised premises.

26. The Government shall surrender possession of the premises upon the expiration or sooner termination of this lease and, if required by the Lessor, shall within sixty (60) days thereafter, or within such additional time as may be mutually agreed upon, remove its signs and other structures; provided that in lieu of removal of structures the Government may abandon

them in place. The Government shall also remove weapons and shells used in connection with its training activities to the extent that a technical and economic capability exists and provided that expenditures for removal of shells will not exceed the fair market value of the land.

27. (a) That, except as otherwise provided in this lease, any dispute concerning a question of fact arising under this lease which is not disposed of by agreement shall be decided by the Division Engineer, U. S. Army Engineer Division, Pacific Ocean, Honolulu, Hawaii, hereinafter referred to as said officer, who shall within a reasonable time reduce his decision and the reasons therefor to writing and mail or otherwise furnish a copy thereof to the Lessor. The decision of the said officer shall be final and conclusive unless, within thirty (30) days from the date of receipt of such copy, the Lessor mails or otherwise furnishes to the said officer a written appeal addressed to the Secretary of the Army. The decision of the Secretary or his duly authorized representative for the determination of such appeals shall be final and conclusive unless determined by a court of competent jurisdiction to have been fraudulent, or capricious, or arbitrary, or so grossly erroneous as necessarily to imply bad faith, or not supported by substantial evidence. In connection with any appeal proceeding under this condition, the Lessor shall be afforded an opportunity to be heard and to offer evidence in support of its appeal.

(b) This condition does not preclude consideration of law questions in connection with decisions provided for in paragraph (a) above; provided, that nothing in this condition shall be construed as making final the decision of any administrative official, representative, or board on a question of law.

(c) That all appeals under this provision shall be processed expeditiously.

28. The Government's compliance with all obligations placed on it by this lease shall be subject to the availability of funds.

29. The Lessor's compliance with any obligations which may be placed on it by this lease shall be subject to the availability of funds and/or personnel.

30. The Lessor warrants that no person or selling agency has been employed or retained to solicit or secure this lease upon an agreement or understanding for a commission, percentage, brokerage, or contingent fee, excepting bona fide employees or bona fide established commercial or selling agencies maintained by the Lessor for the purposes of securing business. For breach or violation of this warranty the Government shall have the right to annul this lease without liability or in its discretion to deduct from the lease price or consideration the full amount of such commission, percentage, brokerage, or contingent fee.

31. No member of or delegate to Congress or resident commissioner shall be admitted to any share or part of this lease or to any benefit that may arise therefrom, but this provision shall not be construed to extend to this lease if made with a corporation for its general benefit.

32. (a) The Government may, by written notice to the Lessor, terminate the right of the Lessor to proceed under this lease if it is found, after notice and hearing, by the Secretary of the Army or his duly authorized representative, that gratuities (in the form of entertainment, gifts, or otherwise) were offered or given by the Lessor, or any agent or

representative of the Lessor, to any officer or employee of the Government with a view toward securing a lease or securing favorable treatment with respect to the awarding or amending, or the making of any determinations with respect to the performing of such lease; provided that the existence of facts upon which the Secretary of the Army or his duly authorized representative makes such findings shall be in issue and may be reviewed in any competent court.

(b) In the event this lease is terminated as provided in paragraph (a) hereof, the Government shall be entitled (i) to pursue the same remedies against the Lessor as it could pursue in the event of a breach of the lease by the Lessor, and (ii) as a penalty in addition to any other damages to which it may be entitled by law, to exemplary damages in an amount (as determined by the Secretary of the Army or his duly authorized representative) which shall be not less than three or more than ten times the costs incurred by the Lessor in providing any such gratuities to any such officer or employee.

(c) The rights and remedies of the Government provided in this clause shall not be exclusive and are in addition to any other rights and remedies provided by law or under this lease.

33. This lease is not subject to Title 10, United States Code, Section 2662.

IN WITNESS WHEREOF, the parties hereto have hereunto subscribed their names as of the date first above written.

STATE OF HAWAII

By: _____
Chairman and Member
Board of Land and Natural Resources

And By: _____
Member
Board of Land and Natural Resources

THE UNITED STATES OF AMERICA

By: _____

Eugene H. Merrill
Deputy Assistant Secretary of the Army (I&L)
(Installations)

APPROVED AS TO FORM:

_____
BERT T. KOBAYASHI
Attorney General
State of Hawaii

_____
PETER C. LEWIS
Deputy Attorney General
State of Hawaii

STATE OF VIRGINIA)
) ss
COUNTY OF ARLINGTON)

On this 17th day of August, 1964, before me appeared Eugene H. Merrill, to me personally known who, being by me duly sworn, did say that he is the DEPUTY ASSISTANT SECRETARY OF ARMY (I&L)-Installations), and that the seal affixed to said instrument is the seal of the Department of the Army and that the said instrument was signed and sealed in behalf of said United States of America under the authority therein mentioned, and said Eugene H. Merrill acknowledged said instrument to be the free act and deed of said United States of America.

In witness whereof I have hereunto set my hand and official seal.

Howard V. Kempter
NOTARY PUBLIC
Arlington County, Virginia

My commission expires November 6, 1966

FORM 314 Certificate of Official Character.

Commonwealth of Virginia)
) to wit:
County of Arlington)

I, H. BRUCE GREEN, Clerk of the Circuit Court of the County aforesaid in the State of Virginia, the same being a Court of record, do certify that Howard V. Kempter whose genuine signature is attached to the foregoing certificate is, and was at the time of signing the same, a Notary Public in and for the said County, duly commissioned and qualified, residing in said County and duly authorized, by virtue of his office, to take acknowledgements to deeds and other writings, and to administer oaths under the laws of this State. I further certify that the official acts of the said Howard V. Kempter are entitled to full faith and credit; that I am well acquainted with the handwriting of the said Howard V. Kempter and verily believe his signature to the foregoing proof or acknowledgment to be genuine; and that his attestation is in due form of law. I further certify that the laws of Virginia do not require the imprint of the Notary's seal to be filed with the authenticating officer.

In testimony whereof I have hereunto set my hand and affixed the seal of the said Court this 17th day of August, 1964, and in the 189th year of the Commonwealth.

H. Bruce Green, *Clerk.*

EXHIBIT "A"

TRACT 26, MAKUA MILITARY RESERVATION

PARCEL "A"

Being a portion of the Government Lands of Makua, Kahanaiki and Keawaula, Waianae, Oahu, Hawaii.

Beginning at Government Survey Triangulation Station "MAKUA 2" on the boundary between Makua and Ohikilolo District, thence running by azimuths measured clockwise from True South:

1. 100° 20' 1,900.00 feet along the land of Ohikilolo;

   Thence along the seashore in a northwesterly direction, the direct azimuth and distance being:

2. 157° 45' 9,483.40 feet;

   Thence along the sea beach at highwater mark, the approximate direct azimuth and distance being:

3. 142° 45' 30" 5,756.30 feet;

4. 215° 20' 2,955.93 feet along the remainder of Government Land of Keawaula to the southwesterly boundary of Kaena Point Missile Tracking Station Site;

5. 293° 52' 30" 2,561.82 feet along Parcel C of Kaena Point Missile Tracking Station Site;

6. 258° 33' 540.47 feet along Parcel C of Kaena Point Missile Tracking Station Site to the main Waianae Range on the boundary between the districts of Waianae and Waialua;

   Thence along the main Waianae Range for the next 11 courses the direct azimuths and distances being:

7. 300° 57' 10" 406.36 feet along Parcel C of Kaena Missile Tracking Station Site and the Government Land of Kuaokala;

8.	301°	26'		598.70	feet along Kuaokala Forest Reserve;
9.	298°	24'		883.70	feet along Kuaokala Forest Reserve;
10.	304°	50'		2,055.20	feet along Kuaokala Forest Reserve;
11.	336°	17'		935.50	feet along Kuaokala Forest Reserve;
12.	230°	15'		820.00	feet along the remainder of Kuaokala Forest Reserve;
13.	270°	35'		510.00	feet along the remainder of Kuaokala Forest Reserve;
14.	331°	40'		530.00	feet along the remainder of Kuaokala Forest Reserve;
15.	33°	13'	30"	224.10	feet along the remainder of Kuaokala Forest Reserve;
16.	299°	44'		545.60	feet along Kuaokala Forest Reserve;
17.	315°	56'		1,268.80	feet along Kuaokala Forest Reserve;
18.	50°	00'		1,100.00	feet along Makua Military Reservation Impact Area;
19.	62°	51'	40"	1,991.74	feet along Makua Military Reservation Impact Area;
20.	329°	28'		1,438.00	feet along Makua Military Reservation Impact Area;
21.	339°	36'		2,440.00	feet along Makua Military Reservation Impact Area;
22.	351°	08'		3,856.00	feet along Makua Military Reservation Impact Area;
23.	0°	30'		2,360.00	feet along Makua Military Reservation Impact Area to the boundary between Makua and Ohikilolo Districts;
					Thence along the land of Ohikilolo, along the ridge, the direct azimuth and distance being:
24.	105°	31'	30"	1,560.10	feet to the point of beginning and containing a gross area of 1,725 ACRES, more or less.

Excluding from the above area the following, leaving a NET AREA OF 1,509.171 ACRES, more or less:

Federal lands	136.36 acres
Private lands	21.31 acres
Farrington Highway Extension	21.00 acres

Canadian Telecommunication Station Site	2.999 Acres
Kaena Point Missile Tracking Station Site	12.00 Acres
Kaena Point Missile Tracking Station Site	22.16 Acres
Total Exclusions	215.829 Acres

SUBJECT TO rights-of-way now used and occupied by Hawaiian Telephone Company, Limited, and The Hawaiian Electric Company, Limited, under rights-of-entry granted by the State of Hawaii.

PARCEL "B"

Land situated at Makua, Waianae, Oahu, Hawaii

Being all of the land quitclaimed to the Territory of Hawaii by the United States of America dated 26 January 1943, pursuant to Public Law 781-77th Congress dated 2 December 1942, and also being Tract 1 of the Makua Military Reservation.

Beginning at the southeast corner of this piece of land, from which the azimuth (measured clockwise from True South) and distance to Government Survey Triangulation Station "LOLO" is 335° 26' 07" 6519.82 feet.

Thence from said point of beginning by azimuths and distances:

1.	84°	04'	35"	610.00 feet;
2.	144°	59'	00"	460.10 feet;
3.	269°	02'	30"	832.85 feet;
4.	353°	23'	00"	330.00 feet to the point of beginning and containing an AREA OF 5.95 ACRES, more or less.

073

SUPPLEMENTAL AGREEMENT NO. 1
TO WITHDRAW FROM
STATE GENERAL LEASE NO. S-3848
DEPARTMENT OF LAND AND NATURAL RESOURCES
STATE OF HAWAII
U. S. LEASE, CONTRACT NO. DA-94-626-ENG-79

THIS SUPPLEMENTAL AGREEMENT NO. 1, made between the STATE OF HAWAII, represented by its Board of Land and Natural Resources, hereinafter called "Lessor" and the United States of America, represented by the Secretary of the Army, hereinafter called the "Government,"

WITNESSETH:

WHEREAS, by State General Lease No. S-3848 (U. S. Lease, Contract No. DA-94-626-ENG-79), dated August 17, 1964, the Lessor demised unto the Government, for military purposes, two parcels of land designated as "Tract 26, Makua Military Reservation" and described as follows:

> PARCEL "A" being a portion of the Government Lands of Makua, Kahanaiki and Keawaula, Waianae, Oahu, Hawaii, containing a gross area of 1,725 acres, more or less, and a net area of 1,509.171 acres, more or less after exclusions, subject to rights-of-way now used and occupied by Hawaiian Telephone Company, Limited, and The Hawaiian Electric Company, Limited, under rights-of-entry granted by the State of Hawaii, and
>
> PARCEL "B" situate at Makua, Waianae, Oahu, Hawaii, containing an area of 5.95 acres, more or less,

for a term ending August 16, 2029; and

WHEREAS, the Lessor desires to withdraw a portion of the demised premises under State General Lease No. S-3848, with no compensation to be paid by the Lessor to the Government, for the addition to the Kaena Point State Park; and

WHEREAS, the Government is agreeable to relinquish said portion of the premises by amendment to the said lease, without compensation, as hereinafter set forth; and

WHEREAS, the Board at its meeting held on April 22, 1988 approved the withdrawal of land from State General Lease No. S-3848, Contract No. DA-94-626-ENG-79, as an addition to the Kaena Point State Park.

NOW, THEREFORE, the parties hereto do mutually agree as follows:

That effective immediately, the Government, for itself, its successors and assigns, does hereby surrender and yield all of its right, title, interest and estate in and to that portion of State General Lease No. S-3848, being a portion of the Government Land of Keawaula and portion of the railroad Right-of-Way in Waianae, situate at Keawaula, Waianae, Oahu, Hawaii, more particularly described in Exhibit "A" and delineated on Exhibit "B," both of which are attached hereto and made parts hereof, said exhibits being, respectively, a survey description and a survey map prepared by the Survey Division, Department of Accounting and General Services, State of Hawaii, said survey description being designated C.S.F. No. 21,036 and said survey map being designated H.S.S. Plat 2174-A; both dated August 28, 1989, and containing a gross area of 758.0 acres, more or less, and a net area of 732.768 acres, more or less, after exclusions, are deleted from the operation and effect of State General Lease No. S-3848, with no compensation, reserving, however, in favor of the Government the right to conduct and operate helicopter flights over the relinquished areas.

AND that the Lessor does hereby accept the withdrawal of said portions of lands described herein.

That except as hereinabove expressly provided, all of the conditions of said State General Lease No. S-3848, shall be and remain the same.

This lease is not subject to Title 10, United States Code, Section 2662.

IN WITNESS WHEREOF, the State of Hawaii, by its Board of Land and Natural Resources, has caused the seal of the Department of Land and Natural Resources to be hereunto affixed and the parties hereto have caused these presents to be executed the 24th day of January, ~~1989.~~ 1990.

STATE OF HAWAII

By _____
Chairman and Member
Board of Land and Natural Resources

Approved by the Board of Land and Natural Resources at its meeting held on April 22, 1988.

THE UNITED STATES OF AMERICA

By _____
MICHAEL D. TAYLOR
Acting Chief, Real Estate Division
U.S. Army Engineer Division, Pacific Ocean
Corps of Engineers

APPROVED AS TO FORM:

_____
Deputy Attorney General

Dated: December 18, 1989

HSS Plat 2174-A

C.S.F. 21,036

WITHDRAWAL
PORTION OF GENERAL LEASE S-3848
TO THE UNITED STATES OF AMERICA

Keawaula, Waianae, Oahu, Hawaii

DLNR
10-20-89
136-G

STATE OF HAWAII
SURVEY DIVISION
DEPT. OF ACCOUNTING AND GENERAL SERVICES
HONOLULU

C.S.F. No. 21,036

August 28, 1989

WITHDRAWAL
PORTION OF GENERAL LEASE S-3848
TO THE UNITED STATES OF AMERICA

Keawaula, Waianae, Oahu, Hawaii

Being a portion of the Government Land of Keawaula and Portion of the Railroad Right-of-Way in Waianae, as described in Item 6 of Schedule A with Grant Deed of the Territory of Hawaii to Oahu Railway and Land Company, dated April 29, 1903, recorded in Liber 249 on Pages 160-167 (Land Office Deed 939) and returned to the State of Hawaii by Oahu Railway and Land Company by Quitclaim Deed, dated September 11, 1961 and recorded in Liber 4135, Pages 239-240 (Land Office Deed S-18222), including Parcel F of Kaena Point State Park, Governor's Executive Order 3338.

Beginning at highwater mark at seashore at the west corner of this parcel of land and at the south corner of Parcel G of Kaena Point State Park, Governor's Executive Order 3338, the coordinates of said point of beginning referred to Government Survey Triangulation Station "KAENA POINT U.S.E." being 6788.02 feet South and 10,163.96 feet East as shown on Government Survey Registered Map H.S.S. Plat 2174-A, thence running by azimuths measured clockwise from True South:-

1. 215° 20' 3057.62 feet along Parcel G of Kaena Point State Park, Governor's Executive Order 3338;

2. 293° 52' 30" 2567.89 feet along Kaena Point Missile Tracking Site;

3. 258° 33' 540.47 feet along Kaena Point Missile Tracking Site;

4. Thence along the middle of Main Waianae Range along Kaena Point Missile Tracking Site, the direct azimuth and distance being:
312° 00' 220.00 feet;

EXHIBIT "A"

5. Thence along middle of Main Waianae Range along Public Shooting Ground and Game Reserve, Governor's Executive Order 1716, the direct azimuth and distance being: 288° 28' 16" 195.06 feet;

Thence along the middle of Main Waianae Range along the Government Land of Kuaokala for the next eight (8) courses, the direct azimuths and distances between points on said middle of Main Waianae Range being:

6. 301° 26' 598.70 feet;

7. 298° 24' 883.70 feet;

8. 304° 50' 2055.20 feet;

9. 336° 17' 935.50 feet;

10. 230° 15' 820.00 feet;

11. 270° 35' 510.00 feet;

12. 331° 40' 530.00 feet;

13. 33° 13' 30" 224.10 feet;

14. Thence along the easterly bank of Kaluakauila Stream, the direct azimuth and distance being: 69° 45' 05" 6585.20 feet;

15. 80° 00' 378.08 feet across Kaena Point Road, Project No. R-AD 2(1) and along Parcel E of Kaena Point State Park, Governor's Executive Order 3338 to highwater mark at seashore;

Thence along highwater mark at seashore for the next three (3) courses, the direct azimuths and distances between points on said highwater mark being:

16. 171° 03' 892.80 feet;

17. 136° 10' 3710.00 feet;

18. 132° 52' 45" 486.42 feet to the point of beginning and containing a GROSS AREA of 758.0 ACRES, MORE OR LESS, and a NET AREA OF 732.768 ACRES, MORE OR LESS after excluding therefrom the following listed exclusions.

C.S.F. No. 21,036

August 28, 1989

EXCLUSIONS

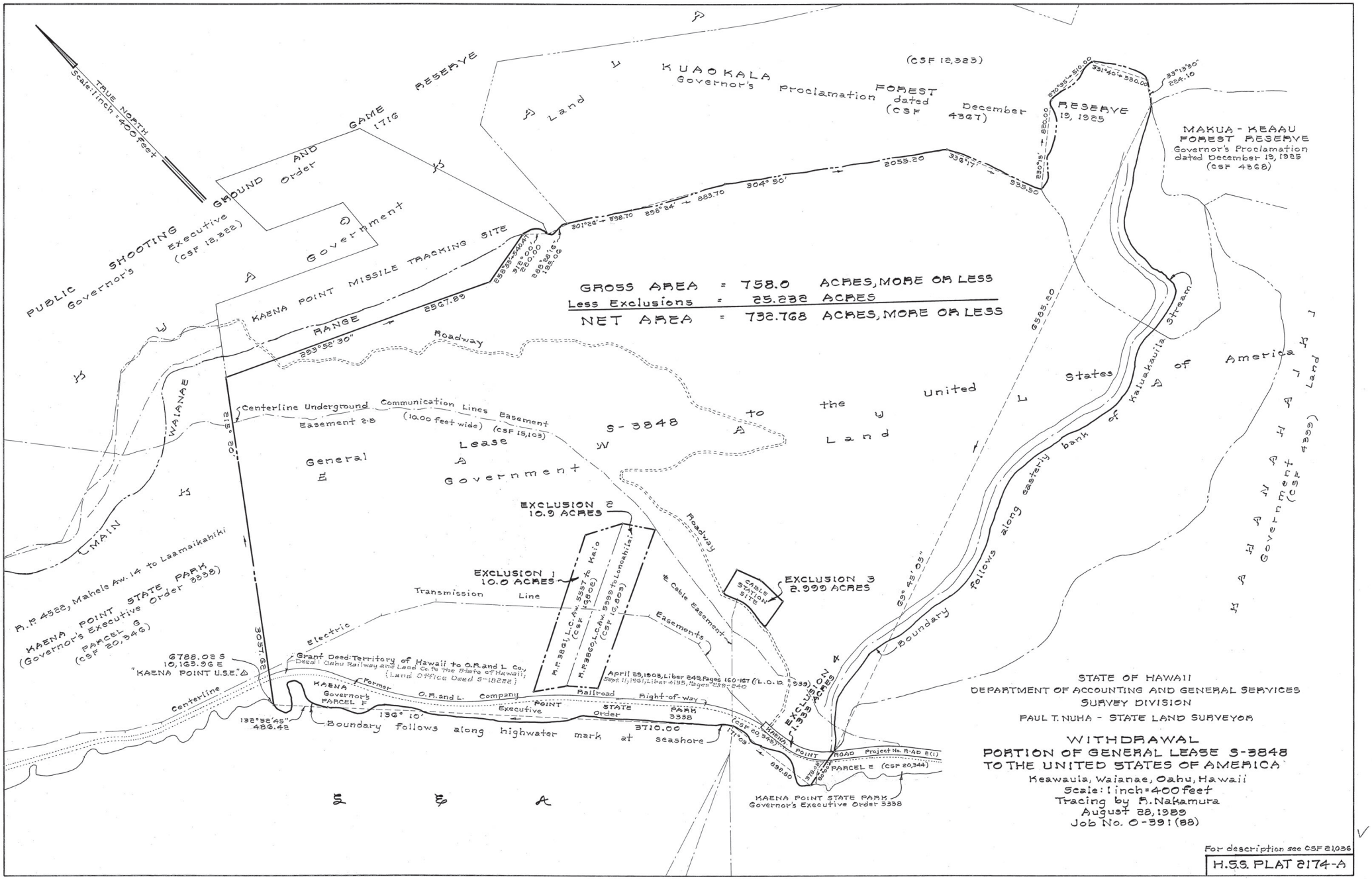
1.	R.P. 3861, L.C.Aw. 5557 to Kaio	10.0 ACRES
2.	R.P. 3860, L.C.Aw. 5999 to Lonoahilei	10.9 ACRES
3.	Cable Station Site	2.999 ACRES
4.	Portion of Kaena Point Road, Project No. R-AD 2(1)	1.333 ACRES
		25.232 ACRES

SURVEY DIVISION
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
STATE OF HAWAII

By: Raymond S. Nakamura
Raymond S. Nakamura
Land Surveyor

gm

Compiled from H.S.S. Plat 2174,
G.L. S-3848 and Gov't. Survey
Records.


TRUE NORTH
Scale: 1 inch = 400 Feet
KUAOKALA FOREST RESERVE
(CSF 12,323)
Land of Hawaii
Governor's Proclamation dated December 19, 1925 (CSF 4367)
MAKUA - KEAAU FOREST RESERVE
Governor's Proclamation dated December 19, 1925 (CSF 4368)
GAME AND PUBLIC SHOOTING GROUND
Governor's Executive Order (CSF 12,322)
Land of Hawaii
Government
KAENA POINT MISSILE TRACKING SITE
RANGE
Roadway
Centerline Underground Communication Lines Easement
Easement 2-B
(10.00 feet wide) (CSF 15,103)
General Lease S-3848 to the United States of America
Land of Hawaii
Government
EXCLUSION 2
10.9 ACRES
EXCLUSION 1
10.0 ACRES
EXCLUSION 3
2.999 ACRES
EXCLUSION 4
1.339 ACRES
CABLE STATION SITE
R.P. 3861, L.C.Aw. 5557 to Kalo
(CSF 16,602)
R.P. 3860, L.C.Aw. 5999 to Lonahuhui
(CSF 16,603)
Transmission Line
Electric
& Cable Easements
Roadway
follows along easterly bank of Kaluakauila Stream
Boundary
MAIN
WAIANAE
R.P. 4522, Mahele Aw. 14 to Laamaikahiki
KAENA POINT STATE PARK
(Governor's Executive Order 3338)
PARCEL 6
(CSF 20,346)
G788.02 S
10,133.96 E
"KAENA POINT U.S.E."
Grant Deed: Territory of Hawaii to O.R. and L. Co.
Dated: Oahu Railway and Land Co. to the State of Hawaii
(Land Office Deed S-18222)
April 29, 1903, Liber 249, Pages 160-167 (L.O.D. # 939)
Sept. 11, 1961, Liber 4135, Pages 245-260
Former O.R. and L. Company Railroad Right-of-Way
KAENA POINT STATE PARK
Governor's Executive Order 3338
PARCEL F
(CSF 20,345)
PARCEL E (CSF 20,344)
KAENA POINT ROAD Project No. R-AD 2(1)
Boundary follows along highwater mark at seashore
3710.00
136° 10'
132° 52' 45"
486.42
305.62
GROSS AREA = 758.0 ACRES, MORE OR LESS
Less Exclusions = 25.232 ACRES
NET AREA = 732.768 ACRES, MORE OR LESS
STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
SURVEY DIVISION
PAUL T. NUHA - STATE LAND SURVEYOR
WITHDRAWAL
PORTION OF GENERAL LEASE S-3848
TO THE UNITED STATES OF AMERICA
Keawaula, Waianae, Oahu, Hawaii
Scale: 1 inch = 400 feet
Tracing by R. Nakamura
August 28, 1989
Job No. O-391 (88)
For description see CSF 21,036
H.S.S. PLAT 2174-A
Tax Map Key: 8-1-01
21" X 32" = 4.67 S.F.

C.S.F. 13,652

CABLE STATION SITE AND ROADWAY AND CABLE EASEMENTS

Keawaula, Waianae, Oahu, Hawaii

See CSFs 14280, 14281, 20,126, 20127, 20341, 22184, 24055

Furnished Land Department
April 5, 1962

Folder 493

STATE OF HAWAII
SURVEY DIVISION
DEPT. OF ACCOUNTING AND GENERAL SERVICES
HONOLULU

C.S.F. No. 13,652

March 30, 1962

CABLE STATION SITE AND ROADWAY AND CABLE EASEMENTS

Keawaula, Waianae, Oahu, Hawaii

Being portions of the Government Land of Keawaula

CABLE STATION SITE. Beginning at the southwest corner of this parcel of land and on the easterly side of the 20-Foot Roadway Easement described below, the coordinates of said point of beginning referred to Government Survey Triangulation Station "KAENA POINT U.S.E." being 9349.86 feet South and 13934.42 feet East, as shown on Government Survey Registered Map 4119, thence running by azimuths measured clockwise from True South:-

1. Along the easterly side of the 20-Foot Roadway Easement described below on a curve to the left with a radius of 501.20 feet, the chord azimuth and distance being: 182° 37' 18.95 feet;

2. 181° 32' 96.39 feet along the easterly side of the 20-Foot Roadway Easement described below;

3. Thence along the easterly side of the 20-Foot Roadway Easement described below on a curve to the right with a radius of 265.96 feet, the chord azimuth and distance being: 184° 49' 15" 30.50 feet;

4. 188° 06' 30" 64.94 feet along the easterly side of the 20-Foot Roadway Easement described below;

5. Thence along the easterly side of the 20-Foot Roadway Easement described below on a curve to the left with a radius of 275.92 feet, the chord azimuth and distance being: 169° 24' 15" 176.97 feet;

6. 150° 42' 19.59 feet along the easterly side of the 20-Foot Roadway Easement described below;

7. Thence along the easterly side of the 20-Foot Roadway Easement described below on a curve to the right with a radius of 220.00 feet, the chord azimuth and distance being: 161° 21' 25" 81.37 feet;

N 548.13 E 352.21
S 548.13 W 352.22 2.999 Acres

Coords Adopted

J.A.A 4/2/62
Colo. Bk 56
Pg. 109

8. 253° 44' 250.00 feet along Government Land;

9. 338° 34' 238.75 feet along Government Land;

10. 357° 54' 267.76 feet along Government Land;

11. 78° 24' 290.00 feet along Government Land to the point of beginning and containing an Area of 2.999 Acres.

Together with a Roadway Easement for ingress and egress thereto as shown on plan attached hereto and made a part hereof and more particularly described as follows:

Being a strip of land 20.00 feet wide and extending 10.00 feet on each side of the following-described centerline.

Beginning at the south end of this centerline, at its intersection with the existing coral road, the coordinates of said point of beginning referred to Government Survey Triangulation Station "KAENA POINT U.S.E." being 10078.70 feet South and 13,289.24 feet East, as shown on Government Survey Registered Map 4119, thence running by azimuths measured clockwise from True South:-

1. 256° 07' 30" 166.02 feet;

2. Thence on a curve to the left with a radius of 450.00 feet, the chord azimuth and distance being: 246° 38' 45" 148.22 feet;

3. 237° 10' 96.88 feet;

4. Thence on a curve to theleft with a radius of 350.00 feet, the chord azimuth and distance being: 217° 46' 232.51 feet;

5. 198° 22' 286.07 feet;

6. Thence on a curve to the left with a radius of 491.20 feet, the chord azimuth and distance being: 189° 57' 143.79 feet;

7. 181° 32' 96.39 feet;

8. Thence on a curve to the right with a radius of 275.96 feet, the chord azimuth and distance being: 184° 49' 15" 31.65 feet;

9. 183° 06' 30" 64.94 feet;

10. Thence on a curve to the left with a radius of 265.92 feet, the chord azimuth and distance being: 169° 24' 15" 170.55 feet;

11. 150° 42' 19.59 feet;

12. Thence on a curve to the right with a radius of 230.00 feet, the chord azimuth and distance being: 161° 21' 25" 85.07 feet and containing an Area of 31,019 Square Feet.

Also, together with a Cable Easement, as shown on plan attached hereto and made a part hereof and more particularly described as follows:-

Being a strip of land 10.00 feet wide and extending 5.00 feet on each side of the following-described centerline.

Beginning at the east end of this centerline and on the westerly boundary of the above-described Cable Station Site, the coordinates of said point of beginning referred to Government Survey Triangulation Station "KAENA POINT U.S.E." being: 9015.95 feet South and 13,938.92 feet East, as shown on Government Survey Registered Map 4119, thence running by azimuths measured clockwise from True South:-

1. 67° 24' 30" 225.99 feet;

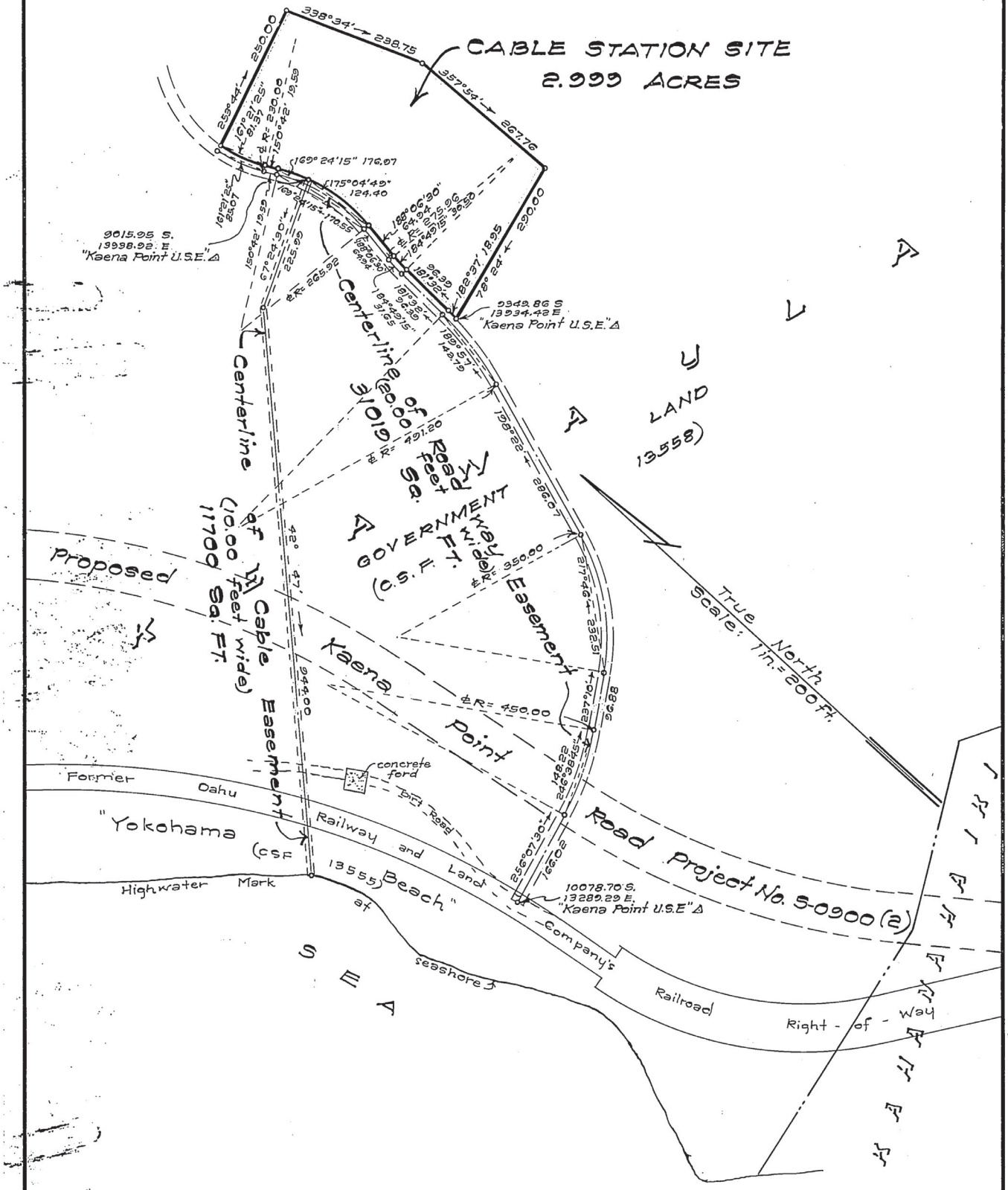
2. 42° 47' 944.00 feet to highwater mark at seashore and containing an Area of 11,700 Square Feet.

SURVEY DIVISION
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
STATE OF HAWAII

Compiled from data furn.
by W.P. Thompson and
Govt.Survey Records.

By: Robert T. Hashimoto
Robert T. Hashimoto
Land Surveyor

ac



CABLE STATION SITE, ROADWAY AND CABLE EASEMENTS
Keawaula, Waianae, Oahu, Hawaii
Scale: 1 inch = 200 feet.

JOB 1092
C. BK 13 (Hashimoto's)

TAX MAP: 8-1-01

SURVEY DIVISION
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
STATE OF HAWAII

C. S. F. No. 13652

R.T.H. Mar. 30, 1962

C.S.F. 16,802

KAENA POINT STATE PARK

PARCEL 50

Keawaula, Waianae, Oahu, Hawaii

Final Order of Condemnation (Civil 32599): Elizabeth Loy Markham et al to State of Hawaii 12-16-75 BK 11266 Pg 557 (LOT 5-1265-2)

Furnished by Attorney General
January 24, 1973

Folder 136-C

STATE OF HAWAII
SURVEY DIVISION
DEPT. OF ACCOUNTING AND GENERAL SERVICES
HONOLULU

C.S.F. No. 16,802

January 16, 1973

KAENA POINT STATE PARK

PARCEL 50

Keawaula, Waianae, Oahu, Hawaii

Being all of R.P. 3861, L.C.Award 5557 to Kaio.

Ehoomaka ma ke kihi hema e hele ana,

Ak.	53°	Kom.		4.50 kh.	ma ke Ala Aupuni, malaila aku,
Ak.	37°	Hik.	i	23.00 kh.	ma ka palena Kula o Kon. a hiki i ka pali, malaila aku,
Hem.	66°	Hik.	i	4.50 kh.	ma ka aoao pali, malaila aku,
Hem.	37°	Kom.	i	24.00 kh.	ma ka palena aina o Lonoahilei, a hiki i ka hoomaka ana.

10 eka

SURVEY DIVISION
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
STATE OF HAWAII

By: Robert T. Hashimoto
Robert T. Hashimoto
Land Surveyor

ac

Copied from original
L.C.Aw. 5557.

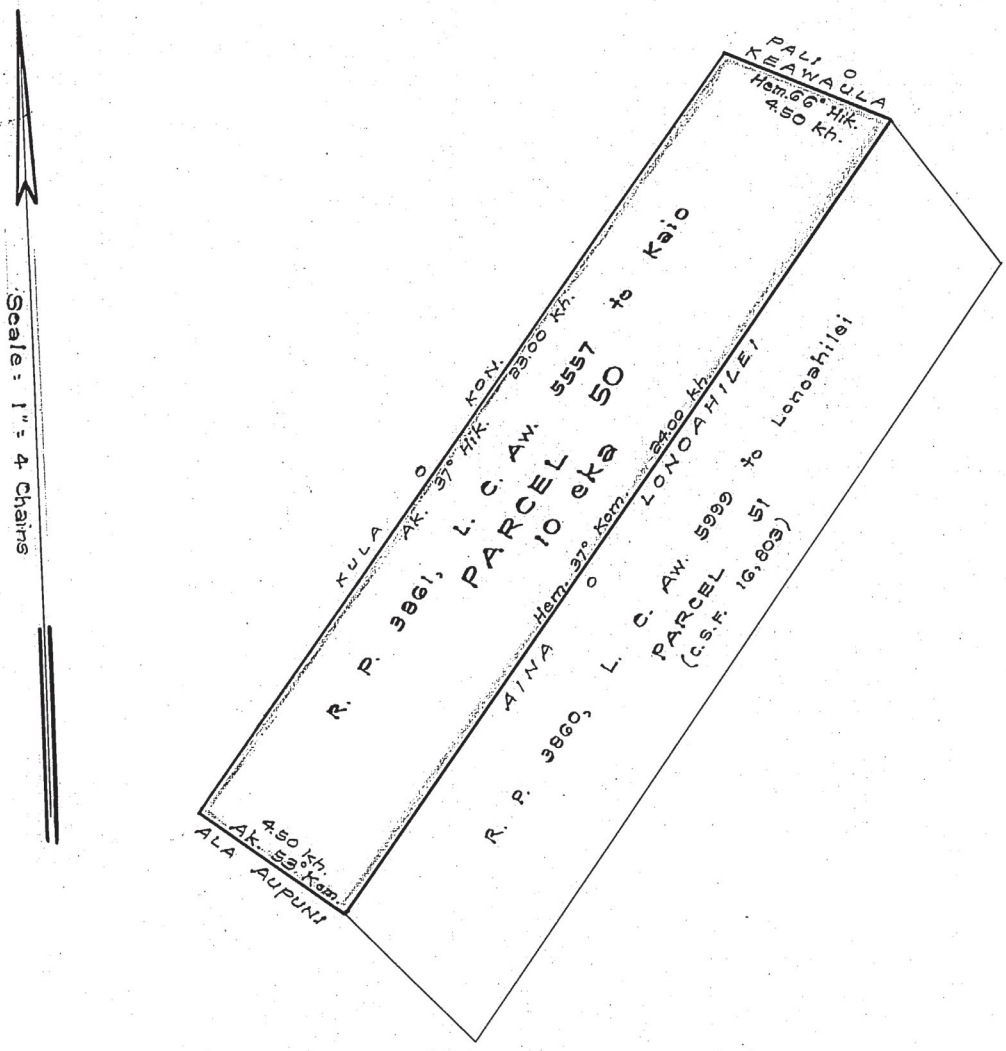
Compared with L.C.A Bk. filed in Ld. Off.
Checked By S. Hasegawa Date: 1/18/73
Cal. Book No. _____ Page _____
Closure _____

R.P. 3861, L.C.AWARD 5557 TO KAIO

Beginning at the south corner of this land and running

N 53° W	4.50 chains	along Government Road, thence
N 37° E	23.00 chains	along the boundary of the konohiki Kula land to the pali, thence
S 66° E	4.50 chains	along the side of the pali, thence
S 37° W	24.00 chains	along the boundary of the land of Lonoahilei to the point of beginning

10 Acres.



KAENA POINT STATE PARK
PARCEL 50

R.P. 3861, L.C.Aw. 5557 to Kaio
Keawaula, Waianae, Oahu, Hawaii

JOB No. O-4812
C. BK

Compiled from Book 4, Page 212
of Book of Land Commission Awards.

TAX MAP: 8-1-01

SURVEY DIVISION
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
STATE OF HAWAII

C. S. F. No. 16,802

C.S.O. Jan. 16, 1973

C.S.F. 16,803

KAENA POINT STATE PARK

PARCEL 51

Keawaula, Waianae, Oahu, Hawaii

Final Order of Condemnation (Civil 32599) Elizabeth Log Morris, et al to State of Hawaii 12-16-75 Bk 11266 Pg 559 (L.O.D. S-26579)

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Furnished by Attorney General
January 24, 1973

Folder 136-C

STATE OF HAWAII
SURVEY DIVISION
DEPT. OF ACCOUNTING AND GENERAL SERVICES
HONOLULU

C.S.F. No. 16,803

January 16,1973

KAENA POINT STATE PARK

PARCEL 51

Keawaula, Waianae, Oahu, Hawaii

Being all of R.P. 3860, L.C.Award 5999 to Lonoahilei.

Ehoomaka ma ke kihi he e hele ana,

A.	43½°	Ko.	i	4.50 kh. ma ka palena ala aupuni, malaila aku,
A.	37°	Hi.	i	24.00 kh. ma ka palena aina o Kaio, malaila aku,
He.	35°	Hi.	i	4.50 kh. ma ka pali o Keawaula, malaila aku,
He.	37½°	Ko.	i	23.50 kh. ma ka palena kula o Konohiki, a hiki i hoomaka ai.

10.9 eka

SURVEY DIVISION
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
STATE OF HAWAII

By: Robert T. Hashimoto
Robert T. Hashimoto
Land Surveyor

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Copied from original
L.C.Aw. 5999.

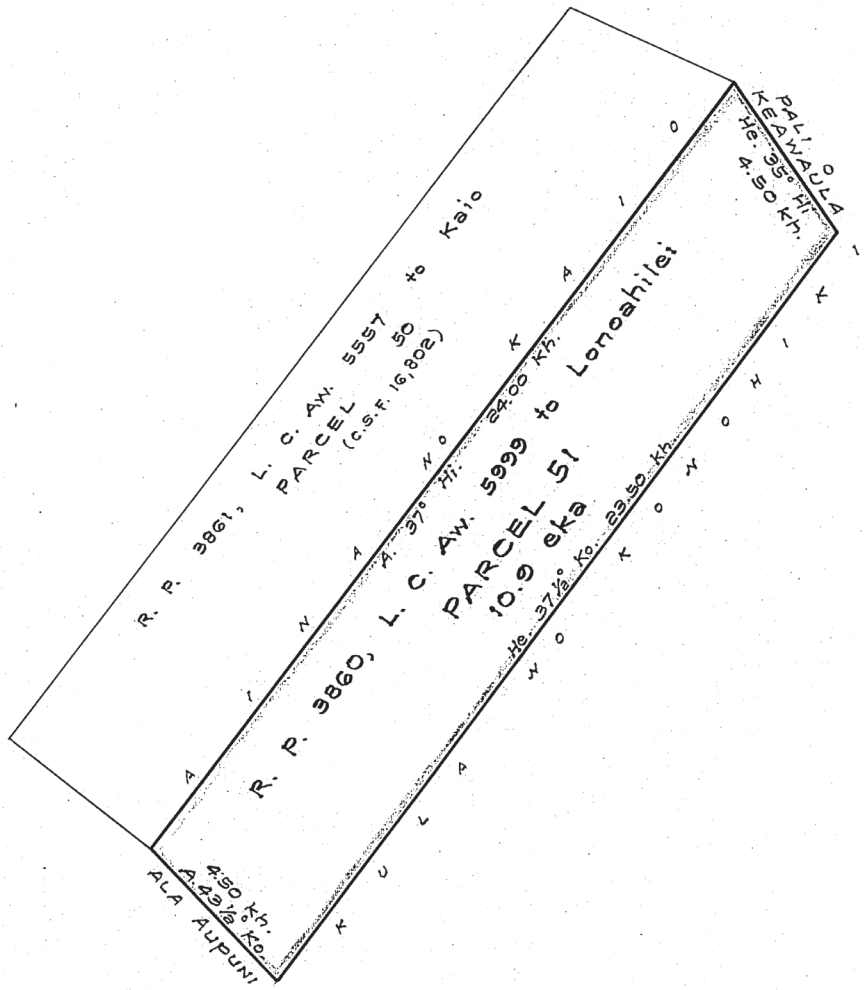
Compared with LCA Bk. filed in Ld. Off.
Checked By S. Hasegawa Date: 1/16/73
Cal. Book No. _____ Page _____
Closure _____

R.P. 3860, L.C.AWARD 5999 TO LONOAHILEI

Beginning at the south corner of this land and running

N 43-1/2° W	4.50 chains	along Government road, thence
N 37° E	24.00 chains	along the boundary of the land of Kaio, thence
S 35° E	4.50 chains	along the pali of Keawaula, thence
S 37-1/2° W	23.50 chains	along the boundary of the Konohiki Kula land to the point of beginning

10.9 Acres.



KAENA POINT STATE PARK
PARCEL 51

R. P. 3860, L. C. Aw. 5999 to Lonoahilei
Keawaula, Waianae, Oahu, Hawaii

JOB No. O-4812
C. BK

Compiled from Book 6, Page 238
of Book of Land Commission Awards.

TAX MAP: 8-1-01

SURVEY DIVISION
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
STATE OF HAWAII

C. S. F. No. 16,803

C.S.O. Jan. 16, 1973

Appendix H

Biological Resources Information

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Appendix H

BIOLOGICAL RESOURCES INFORMATION

Table H-1: USGS Vegetation Classes	
USGS Vegetation Class	**Vegetation Class Composition**
Non-native* Forest	Mixed, dense non-native tree canopy species, with dominants including: *Eucalyptus*, *Casuarina*, *Falcataria*, *Araucaria*, *Fraxinus*, *Melaleuca*, *Psidium*, and *Grevillea* spp.
Non-native* Grassland	Uncharacterized mixed non-native grasslands of complex vegetation mosaics of grass, shrubs, and trees dominated by *Cenchrus setaceus* (fountaingrass), *Cenchrus ciliaris* (buffelgrass), *Cenchrus clandestinum* (kikuyu grass) and other species.
Non-native* Shrubland	Highly variable mixed shrubland dominated locally by one or more species, including *Lantana camara* (*Lantana camara)*, *Leucaena leucocephala* (white leadtree/koa haole), *Schinus terebinthifolius* (Christmas berry), *Acacia farnesiana* var. *farnesiana* (klu), and others.
Closed Ohia Forest	Vegetation dominated by a closed canopy of *Metrosideros polymorpha* (‘ōhi‘a lehua) and other native trees, with varying understories dominated by *Cibotium* spp, native shrubs or *Dicranopteris linearis* (Old World forkfern/uluhe), generally on moderate mesic to wet slopes from lowland to montane elevations.
Cultivated Cropland	Planted lands of variable physiognomy, with annual to multi-year stability. May include ordered rows of tree plantings, includes a wide variety of dominants.
Developed, High Intensity	Contains little or no vegetation, includes heavily built-up urban centers as well as large constructed surfaces.
Developed, Low Intensity	Contains substantial amounts of constructed surface mixed with substantial amounts of vegetated surface.
Kiawe Forest and Shrubland	Vegetation dominated by an open to closed canopy of the non-native shrub/tree *Prosopis pallida* (mesquite/kiawe), with an understory of non-native grasses (e.g. *C. ciliaris*)
Mixed Native- Non-native* Forest	Vegetation dominated by a mixture of non-native and native trees, typically along the transition between native-dominated forest and Non-native Forest.
Mixed Native- Non-native* Shrubs and Grasses	Vegetation dominated by a mixture of mostly native shrubs and non-native grasses.
Native Shrubland / Sparse ‘Ōhi‘a (native shrubs)	Vegetation dominated by shrubs with dominants that include *Leptecophylla* (pūkiawe), *Dodonaea* (‘a‘ali‘i), and *M. polymorpha.*
‘Ōhi‘a Forest	A composite ‘Ōhi‘a Forest class for which canopy closure and dominant understory assemblage is variable and/or indeterminate.

Table H-1: USGS Vegetation Classes	
USGS Vegetation Class	**Vegetation Class Composition**
Open Koa-ʻŌhiʻa Forest	Vegetation dominated by an open canopy of *Acacia koa* (koa), *M. polymorpha*, and other native trees, with an understory dominated by *Cibotium* spp. (hāpuʻu), grass, and native shrubs.
Open ʻŌhiʻa Forest	Vegetation dominated by an open canopy of *M. polymorpha* and other native trees, with an understory dominated by *Cibotium* spp. tree ferns (Cibotium spp.), Non-native grasses, native shrubs.
Open Water	Inland water bodies and coastal fish ponds of at least 0.9 acres in area.
Uluhe Shrubland	Vegetation dominated by a shrubland (technically a fernland) of *D. linearis* and/or other native mat ferns, generally on moderate and steep mesic to wet slopes from lowland to montane elevations, typically on windward island slopes.
Uncharacterized Forest	Open-closed canopy forest of naturalized non-native vegetation in a mosaic of forest, shrubland and grassland with small occurrences of native forest.
Uncharacterized Shrubland	Mixed, typically closed shrub vegetation, naturalized non-native vegetation in a mosaic of surrounding forest, shrubland, and grassland. May also include small occurrences of native shrubland.
Very Sparse Vegetation to Unvegetated	Largely unvegetated, typically open lava or cinder substrates occupying dry settings at subalpine and alpine elevations.

* USGS documents use the term "alien"; for consistency with other Army documents "alien" has been replaced with "non-native".

Source: USGS, 2016

Table H-2: KTA Vegetation Classes			
Vegetation Class	**Acres Occupied Within Kahuku Training Area**	**Acres Occupied Within Tract A-1[1]**	**Acres Occupied Within Tract A-3[1]**
Non-native Forest	7223.3	296.4	642.3
Non-native Grassland	551.8	117.9	0.0
Non-native Shrubland	833.2	85.4	0.4
Closed ʻŌhiʻa Forest	220.9	0.0	45.7
Cultivated Cropland	7.5	0.0	0.0
Developed, Low Intensity	2.5	0.0	0.0
Kiawe Forest and Shrubland	11.4	2.4	0.0
Native Shrubland / Sparse ʻŌhiʻa (native shrubs)	39.8	0.0	12.8
Open Koa-ʻŌhiʻa Forest	349.7	0.0	57.6
Open ʻŌhiʻa Forest	143.5	0.0	0.0
Open Water	2.7	0.0	0.0
Uluhe Shrubland	35.4	0.0	4.7
Uncharacterized Shrubland	5.7	0.0	0.0
Very Sparse Vegetation to Unvegetated	17.4	1.3	0.0
Undefined	3.1	0.0	0.0
Totals[2]	**9447.9**	**503.4**	**763.6**

1. Calculations based on State-owned land + 100-foot buffer.
2. USGS GIS calculations differ from Army GIS calculations due to mapping differences.

Source: USGS, 2016

Table H-3: KTA Native Species	
Scientific Name	**Common, Local**
Plants	
Acacia koa	koa
Adenophorus hymenophylloides	No common name
Adenophorus pinnatifidus	No common name
Adenophorus tamariscinus	Wahine noho mauna
Adenophorus tenellus	kolokolo
Alyxia stellata	maile
Antidesma platyphyllum	hame
Asplenium nidus	bird's-nest ferns, 'ekaha,
Bidens macrocarpa	ko'oko'olau
Bidens torta	ko'oko'olau
Bobea elatior	'ahakea lau nui
Bobea timonioides	'ahakea
Carex meyenii	kāluhāluhā
Carex wahuensis	kāluhāluhā
Ceodes umbellifera	pāpala kēpau
Cheirodendron platyphyllum	lapalapa
Cibotium chamissoi	treefern, hāpu'u
Cibotium glaucum	treefern, hāpu'u
Cibotium menziesii	hāpu'u
Cocculus orbiculatus	hue'ie
Coleus australis	'ala'ala wai nui wahine
Crepidomanes draytonianum	No common name
Crepidomanes parvulum	No common name
Deparia prolifera	No common name
Dianella sandwicensis	'uki'uki
Dicranopteris linearis	unuhe
Diospyros hillebrandii	lama
Diospyros sandwicensis	lama
Diplazium sandwichianum	pohole
Diplopterygium pinnatum	uluhe lau nui

Table H-3: KTA Native Species	
Scientific Name	**Common, Local**
Dodonaea viscosa	ʻaʻaliʻi
Doodia kunthiana	ʻōkupukupulauliʻi
Dracaena halapepe	halapepe
Elaeocarpus bifidus	kalia
Elaphoglossum crassifolium	No common name
Elaphoglossum paleaceum	ʻēkaha
Elaphoglossum pellucidum	hoe-a-Māui
Freycinetia arborea	ʻIeʻie
Gahnia aspera subsp. *globosa*	No common name
Gahnia beecheyi	No common name
Huperzia serrata	No common name
Hydrangea arguta	kanawao
Hymenophyllum recurvum	No common name
Ilex anomala	kāwaʻu
Kadua affinis	manono
Korthalsella complanata	hulumoa
Korthalsella cylindrica	hulumoa
Lepisorus thunbergianus	pākahakaha
Leptecophylla tameiameiae	ʻaʻaliʻi mahu
Machaerina angustifolia	ʻuki
Machaerina mariscoides	ʻahaniu
Melicope clusiifolia	alani
Melicope oahuensis	alani
Melicope peduncularis	alani
Melicope sandwicensis	alani
Melicope spathulata	pilo kea
Metrosideros macropus	ʻōhiʻa lehua
Metrosideros polymorpha var. *glaberrima*	ʻōhiʻa lehua
Metrosideros polymorpha var. *incana*	ʻōhiʻa lehua
Metrosideros polymorpha var. *polymorpha*	ʻōhiʻa lehua
Metrosideros polymorpha var. *pumila*	ʻōhiʻa lehua

Table H-3: KTA Native Species	
Scientific Name	**Common, Local**
Metrosideros rugosa	ʻōhiʻa lehua
Microlepia strigosa var. *strigosa*	palapalai
Myoporum sandwicense	bastard sandalwood, naio
Nephrolepis cordifolia	No common name
Nephrolepis exaltata subsp. *hawaiiensis*	niʻaniʻ
Nertera granadensis	mākole
Nestegis sandwicensis	olopua
Ochrosia compta	hōlei
Odontosoria chinensis	palapalaʻā
Ophioderma pendula	puapuamoa
Oreogrammitis hookeri	No common name
Osteomeles anthyllidifolia	ūluehe
Palhinhaea cernua	wāwaeʻiole
Pandanus tectorius	hala
Paratrophis pendulina	aʻiaʻi
Paspalum scrobiculatum	rice grass
Perrottetia sandwicensis	olomea
Phlegmariurus phyllantha	No common name
Phyllostegia grandiflora	kapana
Pipturus albidus	māmaki
Pittosporum confertiflorum	hōʻawa
Pittosporum flocculosum	hōʻawa
Pittosporum glabrum	hōʻawa
Planchonella sandwicensis	ʻālaʻa
Plumbago zeylanica	ʻilieʻe
Polyscias oahuensis	ʻohe mauka
Pritchardia bakeri	loulu
Pritchardia martii	loulu
Pseudophegopteris keraudreniana	false beach fern
Psilotum complanatum	moa nahele
Psilotum nudum	moa nahele

Table H-3: KTA Native Species	
Scientific Name	**Common, Local**
Psychotria fauriei	kōpiko
Psychotria mariniana	kōpiko
Psydrax odorata	alaheʻe
Pteridium aquilinum subsp. *decompositum*	bracken, kīlau
Rauvolfia sandwicensis	hao
Rhynchospora rugosa subsp. *lavarum*	kuolohia
Rhynchospora sclerioides	kuolohia
Rockia sandwicensis	pāpala kēpau
Sadleria cyatheoides	ʻamaʻu
Sadleria pallida	ʻamaʻu
Sadleria souleyetiana	ʻamaʻu
Sadleria squarrosa	ʻamaʻu
Santalum freycinetianum var. *freycinetianum*	ʻiliahi
Sapindus oahuensis	lonomea
Scaevola gaudichaudiana	mountain naupaka, naupaka kuahiwi
Scaevola glabra	ʻohe naupaka
Scaevola mollis	naupaka kuahiwi
Schizaea robusta	No common name
Selaginella arbuscula	lepelepeamoa
Sida fallax	ʻilima
Sideroxylon polynesicum	keahi
Smilax melastomifolia	akaʻawa
Solanum americanum	glossy nightshade, pōpolo
Sphaerocionium lanceolatum	No common name
Sphaerocionium obtusum	No common name
Stenogrammitis saffordii	kihe
Syzygium sandwicense	ʻōhiʻa ʻai
Tectaria gaudichaudii	ʻiwaʻiwa lau nui
Trematolobelia macrostachys	koliʻi
Vaccinium calycinum	ʻōhelo
Waltheria indica	ʻuhaloa

Table H-3: KTA Native Species	
Scientific Name	**Common, Local**
Wikstroemia oahuensis var. *oahuensis*	kauhi
Wikstroemia uva-ursi	kauhi
Xylosma hawaiiense	a'e
Zanthoxylum dipetalum var. *dipetalum*	kāwa'u
Invertebrates	
Anax strenuous	Hawaiian great darner
Blackburnia fossipennis	No common name
Blackburnia fraterna	No common name
Blackburnia mutabilis	No common name
Blackburnia palmae	No common name
Campsicnemus ornatus	No common name
Drosophila craddockae	No common name
Drosophila crucigera	No common name
Drosophila punalua	No common name
Enicospilus spp.	No common name
Entomobyra spp.	No common name
Eucoilidae spp.	No common name
Forcipomyia hardyi	No common name
Forcipomyia kaneohe	No common name
Hyalopeplus pellucidus	No common name
Hyposmocoma spp.	No common name
Lamellidea spp.	No common name
Limonia hawaiiensis	No common name
Limonia jacoba	No common name
Limonia perkinsi	No common name
Limonia stygipennis	No common name
Mecyclothorax acherontius	No common name
Megalagrion koelense	No common name
Mestolobes minuscula	Hawaiian mestolobes crambid moth
Microvelia vagans	No common name
Nabis kerasphoros	No common name

Table H-3: KTA Native Species	
Scientific Name	**Common, Local**
Nesogonia blackburni	No common name
Orthocladius spp.	No common name
Proterhinus spp.	No common name
Scaptomyza spp.	No common name
Schrankia spp.	No common name
Scotorythra rara	scotorythra moth
Seira spp.	No common name
Sierola kahuku	No common name
Sierola waianaeana	No common name
Tornatellides spp.	No common name
Trioza spp.	No common name
Fish	
Awaous spp.	goby
Sicyopterus stimpsoni	ʻoʻopu nopili

Source: USAG-HI, 2010b; DLNR, 2015a; ANRPO, 2022

Table H-4: Protected Species on State-Owned Land at KTA
Plants
***Polyscias gymnocarpa* ('ohe 'ohe):** This federally endangered species is a long-lived perennial tree and a member of the Araliaceae (ginseng) family. It grows 8 to 33 feet tall with leaves that are odd-pinnately compound with leathery leaflets. It prefers lowland wet, lowland mesic, and wet cliff ecosystems under 3,330-feet in elevation with a range from 50 to greater than 75 inches of annual rainfall. The current statewide population estimate is 63 individuals over 11 locations (USFWS, 2019a). There was a single *P. gymnocarpa* individual historically documented on the southern edge of Tract A-3; however, subsequent attempts to relocate this tree have been unsuccessful, and ANRPO suspects this individual may have died (Kawelo, 2022c). The single individual on Tract A-3 represents 1.6 percent of the statewide population.
Mammals
***Aeorestes semotus* (Hawaiian Hoary Bat, 'ōpe'ape'a)**: In Hawai'i, observations of the Hawaiian hoary bat have occurred in native, non-native, developed, and agricultural areas between sea level and 7,500 feet. No Hawaiian hoary bat roosts have been observed or detected at KTA, but passive acoustic detection of the bat has occurred at five locations on U.S. Government-controlled land at KTA (UH & USGS, ND). ANRPO staff conduct spot surveys for bats roosting in trees that need to be pruned or removed at Army installations during the bat pupping season each year. During 2021, 57 bat surveys were conducted over 39 hours and 347 trees were screened (ANRPO, 2021). While there are no population estimates for this species, according to the 2018 USFWS 5-Year Status Review for Hawaiian hoary bat, the species has been confirmed to be widely distributed and breeding on O'ahu (USFWS 2021a).

Table H-5: KTA Invasive Plant Species		
Scientific Name	**Common, Local**	**Key**
Acacia mangium	hickory wattle	1, 2
Ardisia elliptica	shoebutton	2
Arthrostema ciliatum	No common name	–
Casuarina equisitifolia	Australian pine	–
Casuarina glauca	gray sheoak	–
Cenchrus setaceus	fountaingrass	1, 2, 3
Chrysophyllum oliviforme	satin leaf	–
Clidemia hirta	soap bush, kaurasiga	2
Chromolaena odorata	devil weed	1, 3, 4
Elaeocarpus grandis	quandong, blue marble	1
Eucalyptus robusta	swamp mahogany	–
Grevillea robusta	silk oak	–
Lantana camara	lantana	–
Leucaena leucocephala	white lead tree	–
Macaranga mappa	pengua	3
Melochia umbellate	hierba del soldado	1
Nephrolepis multiflora	Asian sword fern	1
Passiflora edulis	passionfruit	–
Pasiflora suberosa	corky stem passion flower	–
Pimenta dioica	all spice	–
Psidium cattleianum	strawberry guava	3
Psidium guajava	guava	–
Rhodomyrtus tomentosus	rose myrtle	1, 2
Rubus rosifolius	thimbleberry	–
Schinus terebinthifolius	Brazilian pepper tree	3
Schizachyrium condensatum	bush beardgrass	1
Senecio madagascarensis	Madagascar ragwort	1
Sideroxylon persimile	bully tree	1
Sphaeropteris cooperi	Australian tree fern	1
Syzygium jambos	rose apple	–

Table H-5: KTA Invasive Plant Species		
Scientific Name	**Common, Local**	**Key**

1. Controlled and eradicated when found in protected plant species areas
2. State-listed noxious weeds list
3. Hawai'i Invasive Species Council Invasive Species list
4. O'ahu Invasive Species Committee list

Source: USAG-HI, 2010b; Kawelo, 2022a; USDA 2003; HISC, 2022; USDA, 2012; OISC, 2022.

Table H-6: Poamoho Vegetation Classes			
Vegetation Class	**Acres Occupied Within Poamoho Training Area**	**Acres Occupied Within Poamoho Tract[1]**	**Acres Occupied Within Proposed NAR Tract[1]**
Non-native Forest	1878.3	1670.9	282.0
Non-native Grassland	0.8	0.8	0.0
Non-native Shrubland	7.6	7.6	0.8
Closed ʻŌhiʻa Forest	1045.1	733.2	340.1
Native Shrubland / Sparse ʻŌhiʻa (native shrubs)	227.3	74.1	170.8
Native Wet Cliff Vegetation	0.0	0.0	1.4
ʻŌhiʻa Forest	97.5	0.0	102.6
Open Koa-ʻŌhiʻa Forest	447.4	435.1	12.3
Open ʻŌhiʻa Forest	682.9	373.0	332.0
Uluhe Shrubland	23.4	1.3	28.1
Uncharacterized Forest	0.0	0.0	0.1
Totals [2]	**4410.3**	**3296.0**	**1270.1**

1. Calculations based on State-owned land + 100-foot buffer.
2. USGS GIS calculations differ from Army GIS calculations due to mapping differences.

Source: USGS, 2016

Table H-7: Poamoho Native Species	
Scientific Name	**Common, Local**
Plants	
Acacia koa	koa
Adenophorus tamariscinus	wahine noho mauna
Alyxia stellata	maile
Antidesma platyphyllum	hame
Antidesma spp.	hame
Bidens macrocarpa	koʻokoʻolau
Bobea elatior	ʻahakea lau nui
Bobea spp.	ʻahakea
Carex wahuensis	No common name
Cheirodendron platyphyllum	lapalapa
Cheirodendron trigynum	ʻōlapa
Cibotium chamissoi	hāpuʻu
Cibotium glaucum	hāpuʻu
Cibotium menziesii	hāpuʻu
Cibotium spp.	hāpuʻu
Clermontia oblongifolia	ohawai
Coprosma foliosa	pilo
Coprosma longifolia	pilo
Cyclosorus cyatheoides	kikawaiō
Cyrtandra hawaiensis	haʻiwale
Cyrtandra paludosa	haʻiwale
Cyrtandra spp.	haʻiwale
Deparia marginalis	No common name
Deparia prolifera	No common name
Dianella sandwicensis	ʻukiʻuki
Dichanthelium koolauense	No common name
Dicranopteris linearis	uluhe
Diplazium sandwichianum	pohole
Diplopterygium pinnatum	uluhe lau nui
Doodia lyonii	Lyon's hacksaw fern

Table H-7: Poamoho Native Species	
Scientific Name	**Common, Local**
Dubautia laxa	na'ena'e pua melemele
Dubautia plantaginea	na'ena'e
Elaeocarpus bifidus	kalia
Euphorbia clusiifolia	'akoko
Freycinetia arborea	'ie'ie
Huperzia serrata	No common name
Hydrangea arguta	kanawao
Ilex anomala	kawa'u
Isachne distichophylla	No common name
Isachne pallens	No common name
Kadua affinis	manono
Kadua centranthoides	No common name
Kadua fosbergii	manono
Labordia sessilis	kāmakahala
Labordia spp.	Kāmakahala
Lindsaea repens	No common name
Lindsaea repens var. *macraeana*	No common name
Lobelia gaudichaudii	No common name
Lycopodium cernua	wawae 'iole
Machaerina angustifolia	'uki
Machaerina mariscoides	'ahaniu, 'uki
Melicope clusiifolia	alani
Melicope hosakae	No common name
Melicope oahuensis	alani
Melicope spp.	alani
Metrosideros macropus	'ōhi'a
Metrosideros polymorpha var.	'ōhi'a
Metrosideros rugosa	'ōhi'a
Metrosideros tremuloides	'ōhi'a
Microlepia strigosa	palapalai
Nephrolepis cordifolia	No common name

Table H-7: Poamoho Native Species	
Scientific Name	**Common, Local**
Odontosoria chinensis	pala'a
Peperomia oahuensis	'ala'ala wai nui
Perrottetia sandwicensis	'ala'ala wai nui
Phyllostegia glabra	kapana
Phyllostegia grandiflora	kapana
Pipturus albidus	māmaki
Pittosporum glabrum	hō'awa
Planchonella sandwicensis	'āla'a
Plantago pachyphylla	laukahi kuahiwi
Polyscias oahuensis	'ōhe mauka
Polyscias sandwicensis	'ōhe mauka
Pritchardia martii	loulu
Psychotria fauriei	kōpiko
Psychotria hathewayi	kōpiko
Psychotria mariniana	kōpiko
Psychotria spp.	kōpiko
Rhynchospora sclerioides	kuolohia
Sadleria cyatheoides	'ama'u
Sadleria pallida	'ama'u
Scaevola gaudichaudiana	mountain naupaka, naupaka kuahiwi
Scaevola mollis	naupaka kuahiwi
Selaginella arbuscula	lepelepeamoa
Smilax melastomifolia	hoi kauhiwi
Syzygium sandwicense	'ōhia 'ai
Touchardia latifolia	olonā
Trematolobelia macrostachys	koli'i
Vaccinium reticulatum	'ōhelo
Viola kauaensis var. *kauaensis*	No common name
Wikstroemia oahuensis var. *oahuensis*	'ākia

Table H-7: Poamoho Native Species	
Scientific Name	**Common, Local**
Invertebrates	
Anax strenuous	giant Hawaiian Dragonfly
Drosophila arcuata	No common name
Drosophila craddockae	No common name
Drosophila deltaneuron	No common name
Drosophila oahuensis	No common name
Drosophila turbata	No common name
Leptogryllus spp.	No common name
Philonesia spp.	Helicarionid land snail
Prognathogryllus spp.	No common name
Sierola leiocephala	No common name
Succinea spp.	Succineid land snail
Tornatellides / Tornatellina spp.	Achatinellid land snail
Fish	
Kuhlia sandwichensis	āholehole

Source: USAG-HI, 2010b; DLNR, 2015a; Kawelo, 2022b; Kawelo, 2022e

Table H-8: Protected Species Documented on State-Owned Land at Poamoho
Plants
***Cyanea calycina* (haha):** This federally endangered species is a short-lived perennial shrub of the *Campanulaceae* (bellflower) family. It grows 4 to 11 feet tall with an 8-foot spread and has elliptic to oblanceolate leaves. It prefers stream banks, ridge crests, and gulch slopes in wet *Metrosideros-Dicranopteris* forest and shrublands between 1,830 and 3,000 feet in elevation in the Ko'olau Mountains. There are 22 known locations in this mountain range. While it has a statewide population estimate of 362 individuals, less than 110 are in this mountain range (USFWS, 2019b). There has been a single *C. calycina* individual documented on the Poamoho Tract, which is 0.3 percent of the statewide population (USAG-HI, 2022c).
***Cyanea humboldtiana* (haha)**: This federally and State-endangered species is an unbranched woody stem shrub of the *Campanulaceae* (bellflower) family. It grows 3 to 7 feet tall and has inversely broadly elliptic leaves that are 7 to 18 inches long and 3 to 6 inches wide. It prefers stream wet *Metrosideros-Dicranopteris* shrublands between 1,800 and 3,150 feet in elevation in the Ko'olau Mountains. There are currently 40 known individuals in 12 subpopulations in the Ko'olau Mountains (USFWS, 2019c). There has been a single *C. humboldtiana* individual documented on the Proposed NAR Tract, which is 2.5 percent of the statewide population (USAG-HI, 2022c).
***Cyanea koolauensis* (haha):** This federally and State-endangered species is an unbranched shrub of the *Campanulaceae* (bellflower) family. It grows 3 to 5 feet tall with leaves that have shallow, ascending, rounded teeth. It prefers slopes, ridge crests, and gulch bottoms in wet montane *Metrosideros-Dicranopteris* forest with other native plants between 535 and 3,146 feet in elevation. There is an estimated statewide population of 240 individuals, with less than 110 in this mountain range (USFWS, 2019d). There have been 3 *C. koolauensis* individuals documented on the Poamoho Tract, which is 1.3 percent of the statewide population, and 11 individuals documented on the Proposed NAR Tract, which is 4.6 percent of the statewide population (USAG-HI, 2022c).
***Cyanea lanceolata* (haha)**: This federally and State-endangered species is a short-lived perennial unbranched shrub of the *Campanulaceae* (bellflower) family. It grows 3 to 10 feet tall with oblanceolate or elliptic leaves that are 6 to 24 inches long and 2 to 6 inches wide. It prefers mesic valleys and wet forests between 980 and 3,000 feet in elevation. There are 43 individuals known from 11 populations statewide (USFWS, 2019e). There has been a single *C. lanceolata* individual documented on the Poamoho Tract, which is 2.3 percent of the statewide population, and two individuals on the Proposed NAR Tract, which is 4.7 percent of the statewide population (USAG-HI, 2022c).
Cyclosorus boydiae: This federally endangered species is a short-lived perennial fern of the *Thelypteridaceae* (delicate fern) family. It has erect or reclining stems and a tangled root mass that acts as a holdfast with fronds that are 4 to 12 inches long. It prefers rocky, exposed moss-covered rocks and streams in wet *Metrosideros* forest with other native grasses and ferns generally at lower elevations. There are 670 known individuals statewide (USFWS, 2021b). There have been three *C. boydiae* individuals documented on the Poamoho Tract, which is 0.4 percent of the statewide population (USAG-HI, 2022c).
***Euphorbia rockii* ('akoko)**: This federally endangered species is a short-lived perennial compact shrub or small tree of the *Euphorbiaceae* (spurge) family. It grows 2 to 13 feet tall with leathery oblong leaves that are 3 to 6 inches long and 1 inch wide. It is found in *Metrosideros-Dicranopteris* forest and shrubland between 2,100 and 3,000 feet in elevation. There are less than 100 individuals known from 10 populations statewide, all located in in the Ko'olau Mountains (USFWS, 2019f). There has been a single *E. rockii* individual documented on the Proposed NAR Tract, which is 1 percent of the statewide population (USAG-HI, 2022c).
***Gardenia mannii* (nanu)**: This federally and State-endangered species is a short-lived perennial tree of the *Rubiaceae* (coffee) family. It grows 16 to 50 feet tall with inversely lance-shaped leaves. This species prefers stream banks, ridge crests, gulch slopes and bottoms, and leeward drainages in wet to lowland mesic habitats between 700 and 2,300 feet in elevation. The statewide population estimate is 151 individuals (USFWS, 2019g). There have been 7 *G. mannii* individuals documented on the Poamoho Tract, which is 4.6 percent of the statewide population, and 10 individuals documented on the Proposed NAR Tract, which is 6.6 percent of the statewide population (USAG-HI, 2022c).

Table H-8: Protected Species Documented on State-Owned Land at Poamoho
Hesperomannia swezeyi: This federally endangered species is a long-lived perennial tree of the *Asteraceae* (sunflower) family. It grows 5 to 16 feet tall with leaves that are lance or egg shaped. This species generally grows in tight colonies and is most commonly found in wet forests and shrublands between 361 and 3,762 feet in elevation. The Ko'olou population is morphologically different from the Wai'anae population. The statewide population estimate is 458 individuals (USFWS, 2013). There have been eight *H. swezeyi* individuals documented on the Poamoho Tract, which is 1.7 percent of the statewide population, and seven individuals documented on the Proposed NAR Tract, which is 1.5 percent of the statewide population (USAG-HI, 2022c).
***Joinvillea ascendens* subsp. *ascendens* ('ohe)**: This federally endangered and State-candidate species is a short-lived perennial herb of the *Joinvilleaceae* family. It grows 5 to 16 feet tall with leaf blades 18 to 32 inches long that are narrow and elliptic. This species prefers wet to mesic *Metrosideros polymorpha-Acacia koa* montane and lowland forests, as well as intermittent streams, and is generally found with other native species between 1,000 and 4,260 feet in elevation. The statewide population estimate is 100 individuals from 53 occurrences (USFWS, 2021c). There has been a single *J. ascendens* subsp. *ascendens* individual documented on the Poamoho Tract, which is 1.0 percent of the statewide population (USAG-HI, 2022c).
***Melicope hiiakae* ('alani)**: This federally endangered and State-candidate species is a small tree of the *Rutaceae* (Rue) family. It grows 7 to 23 feet tall with glossy, leathery, thin, elliptic leaves. This species prefers lowland wet *Metrosideros-Dicranopteris* forest between 1,200 and 3,100 feet in elevation. The statewide population estimate is 50 individuals in three locations (USFWS, 2019h). There have been two *M. hiiakae* individuals documented on the Proposed NAR Tract, which is 4 percent of the statewide population (USAG-HI, 2022c).
***Melicope lydgatei* ('alani)**: This federally and State-endangered species is a long-lived perennial small shrub of the *Rutaceae* (Rue) family. This species' leaves are arranged oppositely or in threes that are glossy and papery and are 2 to 5 inches long and 1 to 3 inches wide. It prefers open ridges in mesic forests between 1,350 and 1,800 feet in elevation. The statewide population estimate is 12 individuals (USFWS, 2019i). There has been a single *M. lydgatei* individual documented on the Poamoho Tract, which is 8.3 percent of the statewide population, and three individuals documented on the Proposed NAR Tract, which is 25 percent of the statewide population (USAG-HI, 2022c).
***Myrsine juddii* (kolea)**: This federally and State-endangered species is a short-lived, many branched perennial shrub of the *Primulaceae* (primrose) family. It is 4 to 7 feet tall with 2- to 5-inch-wide leathery leaves that are approximately 1 inch long and inverse lance-shaped. This species prefers wet forests dominated by *Metrosideros* between 1,900 and 2,820 feet in elevation. The statewide population estimate is 548 individuals (USFWS, 2019j). There has been a single *M. juddii* individual documented on the Poamoho Tract, which is 0.2 percent of the statewide population, and five individuals documented on the Proposed NAR Tract, which is 0.9 percent of the statewide population (USAG-HI, 2022c).
Phyllostegia hirsuta: This federally endangered species is a short-lived perennial erect sub-shrub or vine of the *Lamiaceae* (mint) family. It has ovate-shaped leaves 6 to 12 inches long and 3 to 7 inches wide. This species prefers steep, shaded cliffs, slopes, gullies, ridges, and stream banks in wet or mesic forests dominated by *M. polymorpha* between 640 and 3,943 feet in elevation. The statewide population estimate is 131 individuals (USFWS, 2019k). There has been a single *P. hirsuta* individual documented on the Proposed NAR Tract, which is 0.8 percent of the statewide population (USAG-HI, 2022c).
Platydesma cornutava* var. *decurrens: This federally endangered species is a short-lived perennial shrub of the *Rutaceae* (Rue) family. It grows 3 to 23 feet tall and has sparse branches with clustered leaves that radiate from the ends. This species prefers a dry cliff and lowland mesic ecosystem between 1,850 and 3,040 feet in elevation. The statewide population estimate is 103 individuals (USFWS, 2019l). There has been a single *P. cornutava* var. *decurrens* individual documented on the Proposed NAR Tract, which is 1.0 percent of the statewide population (USAG-HI, 2022c).

Table H-8: Protected Species Documented on State-Owned Land at Poamoho
Polyscias gymnocarpa **('ohe 'ohe)**: This federally endangered species is a long-lived perennial tree of the *Araliaceae* (ginseng) family. It grows 8 to 33 feet tall with leaves that are odd-pinnately compound with leathery leaflets. It prefers lowland wet, lowland mesic, and wet cliff ecosystems under 3,330 feet in elevation with a range from 50 to greater than 75 inches of annual rainfall. The statewide population is estimated to be 63 individuals over 11 populations (USFWS, 2019a). There were two *P. gymnocarpa* individuals documented the Proposed NAR Tract, which is 3.2 percent of the statewide population (USAG-HI, 2022c).
Pteris lidgatei: This federally and State-endangered species is a short-lived perennial terrestrial course herb/fern of the *Adiantaceae* family. It has a 0.6-inch-thick rhizome that grows horizontally to about 4 inches when mature with fronds that are 24 to 27 inches long and 8 to 18 inches wide. This species prefers a lowland wet forest mesic ecosystem between 1,750 and 3,000 feet in elevation. The statewide population estimate is 28 individuals (USFWS, 2021d). There has been a single *P. lidgatei* individual documented on the Proposed NAR Tract, which is 3.6 percent of the statewide population (USAG-HI, 2022c).
Sanicula purpurea: This federally and State-endangered species is a stout perennial herb of the *Apiaceae* (parsley) family. It grows from a massive stem that is 3 to 14 inches tall with fronds that are 1 to 3 inches with kidney- or egg-heart-shaped leaves. This species prefers open *Metrosideros* mixed montane bogs, and occasionally *Metrosideros* mixed montane wet shrublands between 2,300 and 5,570 feet in elevation. The statewide population estimate is 26 individuals (USFWS, 2018a). There has been a single *S. purpurea* individual documented on the Proposed NAR Tract which is 3.8 percent of the statewide population (USAG-HI, 2022c).
Viola oahuensis: This federally and State-endangered species is an erect woody shrub of the *Violaceae* (violet) family. It grows 2 to 16 inches tall with elliptic- to ovate-shaped leaves that are papery in texture and cluster at the end of each stem. It prefers to be on or near exposed, windswept summit ridges of moderate to steep slopes in wet *Metrosideros-Dicranopteris* shrublands between 2,300 and 2,800 feet in elevation. The statewide population estimate is 584 individuals (USFWS, 2019m). There were two *V. oahuensis* individuals documented in the Proposed NAR Tract, which is 0.3 percent of the statewide population (USAG-HI, 2022c).
Zanthoxylum oahuense **(a'e)**: This federally endangered and State-candidate species is a small tree of the *Rutaceae* (Rue) family. It grows 10 to 20 feet tall with leaflets that are usually lateral pairs that are asymmetrically triangular, leathery, and in sets of three. This species prefers steep slopes and ridges in wet forest between 2,060 and 2,720 feet in elevation. The statewide population estimate is at least 50 individuals (USFWS, 2019n). There have been three *Z. oahuense* individuals documented on the Proposed NAR Tract, which is 6 percent of the statewide population (USAG-HI, 2022c).
Invertebrates
Achatinella **species (O'ahu tree snails)**: Little is known about this genus, which is in steep decline, most likely from habitat destruction and introduced predators, including carnivorous snails and rats. The *Achatinella* 5-Year Status Review estimates a potential population of 243 *A. byronii/decipiens*, 5 *A. sowerbyana*, and an unknown number of *A. apexfulva* (USFWS, 2019o). There have been 2 *A. byronii/decipiens* individuals documented on the Poamoho Tract, which is less than 1 percent of the statewide population, and 1 *A. apexfulva* individual documented on the Poamoho Tract, for which no statewide population estimate is available; all individuals were documented up near the Poamoho trail to the north. There have been 8 *A. byronii/decipiens* individuals documented on the Proposed NAR Tract, which is 3.3 percent of the statewide population, and 2 *A. sowerbyana* individuals documented on the Proposed NAR Tract, which is 40 percent of the statewide population (USAG-HI, 2022c).

Table H-8: Protected Species Documented on State-Owned Land at Poamoho
***Megalagrion nigrohamatum nigrolineatum* (blackline Hawaiian damselfly)**: There is little is known about the population trends or abundance of the blackline Hawaiian damselfly; however, this species is found in the lowland wet ecosystems of the Koʻolau Mountains. Critical habitat has been identified for the blackline Hawaiian damselfly along the eastern border of Poamoho, just outside of the State-owned land area. The most recent statewide population estimate, in 2012, ranged between 800 and 1,000 individuals; no other population estimates are available (USFWS, 2019p). There have been at least 10 documented individuals of the blackline Hawaiian damselfly up near the Poamoho trail to the north by ANRPO staff (Kawelo, 2023a). The percentage that these documented individuals represent among the statewide population is unknown.
Birds
***Drepanis coccinea* (scarlet honeycreeper, i'i'wi)**. While this species generally prefers elevations higher than 4,100 feet, O'ahu populations occur at lower elevations. The scarlet honeycreeper is known to fly long distances in search of flowering *M. polymorpha*, which also provides nesting habitat; it has been observed frequenting *Hibiscus arnottianus* subsp. *arnottianus* (white hibiscus, koki'o ke'oke'o) during peak flowering times (Kawelo, 2022d). The population estimate for the scarlet honeycreeper statewide is approximately 605,420 individuals with 90 percent of that population residing on Hawai'i Island. There is no population estimate for O'ahu, although it is considered a small remnant population, with most sightings occurring in the Wai'anae Mountains (PIFWO, 2016). There have been four scarlet honeycreeper individuals documented on the Poamoho Tract and three individuals on the Proposed NAR Tract, both of which are far less than 0.01 percent of the statewide population (USAG-HI, 2022c).
***Pterodroma sandwichensis* (Hawaiian petrel)**. The Hawaiian petrel is a seabird endemic to Hawai'i. It nests in burrows, under vegetation, and in crevices and prefers to breed at between 480 and 3,600 feet in elevation in steep, wet montane forest dominated by *M. polymorpha* with *Dicranopteris linearis* understory and on steep dry cliffs. The population estimate for the Hawaiian petrel statewide is between 9,000 to 16,000; there is no population estimate for O'ahu (USFWS, 2023e). There have been five Hawaiian petrel detections along the eastern edge of the Proposed NAR Tract; however, no burrows have been detected, and this species use of State-owned land has not been established. Assuming the five Hawaiian petrel detections represent five individuals, this represents far less than 0.01 percent of the statewide population (DLNR, 2022c).
***Puffinus newelli* (Newell's shearwater, 'ua'u)**. The Newell's shearwater is a seabird endemic to Hawai'i. It nests in burrows, under vegetation, and in crevices and prefers to breed at between 480 and 3,600 feet in elevation in steep, wet montane forest dominated by *M. polymorpha* with *Dicranopteris linearis* understory and on steep dry cliffs. The at-sea population estimate for the Newell's shearwater is 83,739 individuals. Approximately 90 percent of the population occurs on Kauai; there is no population estimate for O'ahu (USFWS, 2017). There have been 170 Newell's shearwater detections along the eastern edge of the Proposed NAR Tract; however, no burrows have been detected. Assuming the 170 Newell's shearwater detections represent 170 individuals, this represents far less than 0.01 percent of the at-sea population estimate (DLNR, 2022c).
Mammals
***Aeorestes semotus* (Hawaiian Hoary Bat, 'ōpe'ape'a)**: In Hawai'i, observations of the Hawaiian hoary bat have occurred in native, non-native, developed, and agricultural areas between sea level and 7,500 feet. There is potential roosting habitat for Hawaiian hoary bat at Poamoho; however, no roosts have been detected, and no passive acoustic detections have been documented (UH & USGS, ND). While there are no population estimates for this species, according to the 2018 USFWS 5-Year Status Review for Hawaiian hoary bat, the species has been confirmed to be widely distributed and breeding on O'ahu (USFWS 2021a).

Table H-9: Poamoho Invasive Plant Species		
Scientific Name	**Common, Local**	**Key**
Angiopteris evecta	oriental vessel fern	1, 3
Arthrostema ciliatum	No common name	1
Andropogon virginicus	broom sedge bluestem	2
Ardisia elliptica	shoebutton	2
Axonopus fissifolius	common carpet grass	–
Brachiaria mutica	para grass	–
Blechnum appendiculatum	swamp fern	–
Casuarina equisetifolia	ironwood	1
Casuarina glauca	gray sheoak	1
Cercropia obtusifolia	trumpet tree	–
Citharexylum caudatum	juniper berry	–
Clidemia hirta	soap bush	2
Cordyline fruticosa	tiplant	–
Cyathea cooperi	Australian tree fern	1, 3
Deparia petersenii	Japanese false spleenwort	–
Eucalyptus robusta	swamp mahogany	–
Falcataria moluccana	Batai	1
Hedychium coronarium	white ginger	1
Hedychium gardnerianum	kāhili ginger	1, 3
Heliocarpus popayanensis	white moho	–
Juncus planifolius	broad leaf rush	–
Leptospermum scoparium	manukā	1
Lantana camara	lantana	–
Oplismenus hirtellus	bristle basket grass	–
Paspalum conjugatum	hilo grass	–
Passiflora suberosa	corky stem passion flower	–
Psidium cattleianum	strawberry guava	3
Psiduium guajava	guava	–
Pterolepis glomerata	false meadow beauty	–
Rhynchospora caduca	angle stem beak sedge	1
Sacciolepis indica	Glenwood grass	–

Table H-9: Poamoho Invasive Plant Species		
Scientific Name	**Common, Local**	**Key**
Schefflera actinophylla	octopus tree	1
Schinus terebinthifolius	Brazilian pepper tree	3
Seteria palmifolia	palm grass	1
Syzygium cumini	Java plum	–
Syzgium jambos	rose apple	–

1. Controlled and eradicated when found in protected plant species areas
2. State-listed noxious weeds list
3. Hawai'i Invasive Species Council Invasive Species list
4. O'ahu Invasive Species Committee list

Source: USAG-HI, 2010b; Kawelo 2022a; USDA 2003; HISC, 2022; USDA, 2012; OISC, 2022

Table H-10: MMR Vegetation Classes					
Vegetation Class	**Acres Occupied Within MMR**	**Acres Occupied Within Makai Tract[1]**	**Acres Occupied Within North Ridge Tract[1]**	**Acres Occupied Within Center Tract [1]**	**Acres Occupied Within South Ridge Tract[1]**
Non-native Forest	360.3	0.7	5.7	0.0	0.0
Non-native Grassland	1367.5	70.2	91.4	59.3	36.3
Non-native Shrubland	1592.8	81.2	136.1	141.5	62.2
Closed ʻŌhiʻa Forest	5.8	0.0	0.0	0.0	0.0
Developed, Low Intensity	98.1	27.2	0.6	15.2	2.2
Kiawe Forest and Shrubland	102.9	9.5	21.7	0.1	1.3
Mixed Native/Non-native Forest	661.4	1.5	56.2	0.0	0.0
Mixed Native/Non-native Shrubs and Grasses	108.7	12.6	33.9	0.0	0.0
Open ʻŌhiʻa Forest	13.8	0.0	0.0	0.0	0.0
Open Water	2.0	2.0	0.0	0.0	0.0
Uluhe Shrubland	6.0	0.0	0.0	0.0	0.0
Uncharacterized Shrubland	42.5	0.0	0.0	0.0	0.0
Very Sparse Vegetation to Unvegetated	28.0	21.2	0.9	0.0	0.4
Totals [2]	**4389.5**	**226.1**	**346.5**	**216.0**	**102.5**

1. Calculations based on State-owned land + 100-foot buffer.
2. USGS GIS calculations differ from Army GIS calculations due to mapping differences.

Source: USGS, 2016

Table H-11: MMR Native Species	
Scientific Name	**Common, Local**
Plants	
Abutilon incanum	hoary abutilon, maʻo
Alyxia stellata	maile
Antidesma platyphyllum	hame
Artemisia australis	ʻāhinahina
Asplenium nidus	ʻekaha
Bidens macrocarpa	koʻokoʻolau
Bidens torta	koʻokoʻolau
Bobea sandwicensis	ʻahakea
Carex meyenii	kāluhāluhā
Carex spp.	No common Name
Carex wahuensis	No common Name
Chrysodracon halapepe	halapepe
Cibotium chamissoi	hāpuʻu
Cocculus orbiculatus	Queen coralbead
Coprosma foliosa	pilo
Deparia prolifera	No common Name
Dianella sandwicensis	ʻukiʻuki
Diospyros hillebrandii	lama
Diospyros sandwicensis	lama
Diplazium sandwichianum	pohole
Dodonaea viscosa	ʻaʻaliʻi
Doodia kunthiana	No common Name
Doryopteris decora	kumuniu
Dryopteris sandwicensis	No common Name
Elaeocarpus bifidus	kalia
Erythrina sandwicensis	wiliwili
Eugenia reinwardtiana	nīoi
Euphorbia celastroides	ʻakoko
Freycinetia arborea	ʻieʻie
Hibiscus arnottianus subsp. *arnottianus*	kokiʻo keʻokeʻo

Table H-11: MMR Native Species	
Scientific Name	**Common, Local**
Kadua centranthoides	No common Name
Metrosideros polymorpha	ʻōhiʻa
Microlepia strigosa	palapalai
Myoporum sandwicense	bastard sandalwood, naio
Myrsine lessertiana	kōlea lau nui
Nestegis sandwicensis	olopua
Osteomeles anthyllidifolia	ʻulei
Peperomia blanda	ʻalaʻala wai nui
Peperomia membranacea	ʻalaʻala wai nui
Peperomia tetraphylla	ʻalaʻala wai nui
Pipturus albidus	māmaki
Plectranthus parviflorus	ʻalaʻala wai nui Waihine
Plumbago zeylanica	ʻilieʻe, hilieʻe
Polyscias sandwicensis	ohe makai
Psychotria hathewayi	kōpiko
Psychotria mariniana	kōpiko
Psydrax odorata	alaheʻe
Rauvolfia sandwicensis	hao
Santalum ellipticum	ʻiliahialoʻe
Sapindus oahuensis	lonomea
Schiedea spp.	No common Name
Sicyos pachycarpus	kūpala
Sicyos spp.	No common Name
Sida fallax	ʻilima
Solanum americanum	glossy nightshade, pōpolo
Waltheria indica	ʻuhaloa
Wikstroemia oahuensis var. *oahuensis*	ʻākia
Invertebrates	
Amastra rubens	Amastrid land snail
Auriculella ambusta	Achatinellid land snail
Auriculella spp. *aff. Castanea*	Achatinellid land snail

Table H-11: MMR Native Species	
Scientific Name	**Common, Local**
Auriculella spp. *aff. Perpusilla*	Achatinellid land snail
Auriculella Partulina dubia	Achatinellid land snail
Drosophila ambochila	picture wing fly
Drosophila crucigea	picture wing fly
Drosophila gradata	picture wing fly
Drosophila hexachaetae	picture wing fly
Drosophila inedita	picture wing fly
Drosophila montgomeryi	picture wing fly
Drosophila punalua	picture wing fly
Drosophila turbata	picture wing fly
Philodoria lysimachiella	No common Name
Rhyncogonus fordi	No common Name
Rhyncogonus fuscus	No common Name
Sierola balteata	No common Name
Sierola koloa	No common Name
Sierola kumumu	No common Name
Sierola tumidoventris	No common Name

Source: USAG-HI, 2010a; DLNR, 2015a; Kawelo, 2022b; Kawelo, 2022e

Table H-12: Protected Species Documented on State-Owned Land at MMR
Plants
***Abutilon sandwicense* (green flower Indian mallow)**: This federally and State-endangered species is a short-lived perennial shrub of the *Malvaceae* (mallow) family. It grows up to 10 feet tall with short glandular hairs and light green heart-shaped leaves that are 3 to 9 inches long. It prefers gulches or steep slopes in mesic lowland forest between 500 and 2,900 feet in elevation, and between 50 and 75 inches of annual rainfall. There are 727 individuals, including 200 reintroduced individuals, known from 4 managed population units estimated in statewide population for which ANRPO undertakes management and stabilization to fulfill 2003 and 2008 BO requirements (USFWS, 2019q). There have been three occurrences of *A. sandwicense* on the North Ridge Tract within the Kaluakauila MU, which is 0.4 percent of the statewide population (USAG-HI, 2022c; Kawelo, 2023b).
***Bonamia menziesii* (Hawai'i lady's nightcap)**: This federally and State-endangered species is a short-lived perennial woody vine of the *Convolvulaceae* (morning glory) family. Its twining branches grow up to 33 feet long, with leathery leaves that are 1 to 4 inches wide and up to 1.6 inches long. On O'ahu, this species prefers dry or mesic forest between 266 and 2,158 feet in elevation. It is estimated that the statewide population is approximately 100 individuals (USFWS, 2021e). There have been three *B. menziesii* individuals documented on the North Ridge Tract within the Kaluakauila MU, which is 3 percent of the statewide population.
***Dracaena forbesii* (Wai'anae Range halapepe)**: This federally endangered species is a short-lived perennial tree of the *Asparagaceae* (asparagus) family. It grows 10 to 23 feet tall and has spirally clustered leaves at the end of the branch that are 9 to 15 inches long and up to 0.5 inch wide. It prefers *Dodonaea* shrubland, cliffs, and lowland dry and mesic *Diospyros-Metrosideros Acacia* forest between 800 and 2,920 feet in elevation within the Wai'anae Mountain range. It is estimated the statewide population is spread across 11 populations with less than 150 individuals total (USFWS, 2019r). There has been a single *D. forbesii* individual documented on the North Ridge Tract within the Kaluakauila MU, which is 0.7 percent of the statewide population (USAG-HI, 2022c).
***Euphorbia celastroides kaenana* ('akoko)**: This federally endangered species is a short-lived perennial shrub of the *Euphorbiaceae* (spurge) family. It grows up to 5 feet tall, has milky sap, and has leaves arranged in two opposite rows that drop during the dry season and are 1 to 2 inches long and up to 1 inch wide. It prefers coastal dry shrubland on windward talus (debris pile up to a characteristic angle of repose) slopes between 30 and 700 feet in elevation. It is estimated that the statewide population is spread across 9 populations with 1,649 individuals (USFWS, 2019s). There have been a 48 *E. celastroides kaenana* individuals documented on the North Ridge Tract within the Pua'akanoa MU, which is 2.9 percent of the statewide population, and 56 individuals documented on the South Ridge Tract within the Lower 'Ōhikilolo MU, which is 3.4 percent of the statewide population (USAG-HI, 2022c).
***Euphorbia haeleeleana* (Herbst's sandmat, 'akoko)**: This federally and State-endangered species is a dioecious (male and female flowers on separate plants) tree of the *Euphorbiaceae* (spurge) family. It grows between 10 and 46 feet tall and has papery alternate leaves 4 to 6 inches long and 2 inches wide. It prefers dry to mesic forests between 512 and 1,922 feet in elevation with other native plants. The statewide population is estimated to be 167 individuals (USFWS, 2021f). There have been a 58 *E. haeleeleana* individuals documented on the North Ridge Tract within the Kaluakauila MU, which is 34.7 percent of the statewide population (USAG-HI, 2022c).
***Hibiscus brackenridgei* subsp. *mokuleianus* (Mokuleia rosemallow, maohauhele)**: This federally and State-endangered species is an erect or sprawling shrub or small tree of the *Malvaceae* (mallow) family. It grows up to 16 feet tall and has heart-shaped leaves 2 to 6 inches long and wide. It prefers lowland dry to mesic forest and shrubland between 394 and 787 feet in elevation. The statewide population is estimated to be 181 individuals over 5 populations (USFWS, 2021g). There have been 5 *H. brackenridgei* subsp. *mokuleianus* individuals documented on the North Ridge Tract (4 of which were within the Kaluakauila MU), which is 2.8 percent of the statewide population, and 17 individuals documented on the South Ridge Tract within the Lower 'Ōhikilolo MU, which is 9.4 percent of the statewide population (USAG-HI, 2022c).

Table H-12: Protected Species Documented on State-Owned Land at MMR
Melanthera tenuifolia **(slender-leaf nehe, nehe)**: This federally endangered species is a short-lived perennial woody herb of the *Asteraceae* (sunflower) family. The stems are 10 feet or longer, with a root that runs along the lower surface, and oppositely arranged leaves. It prefers mesic to dry habitat on ridge tops, bluffs, or cliffs in open areas and protected pockets or lama dominated shrublands or forests between 361 and 3,208 feet in elevation. The statewide population is estimated to be 2,100 individuals over 5 populations (USFWS, 2019t). There has been a single *M. tenuifolia* individual documented on the North Ridge Tract, which is less than 0.01 percent of the statewide population, and 2 individuals documented on the South Ridge Tract within the Lower ʻŌhikilolo MU, which is also less than 0.01 percent of the statewide population (USAG-HI, 2022c).
Neraudia angulata **(angular fruit, maʻoloa)**: This federally and State-endangered species is an erect shrub and is a member of the *Urticaceae* (nettle) family. It grows up to 10 feet tall with thin elliptic/oval leaves that are 3 to 6 inches long and up to 2 inches wide. It is found on steep slopes, gulches, and cliff faces in open dry forest between 200 and 2,300 feet in elevation. The statewide population is estimated to be 85 individuals over 7 populations (USFWS, 2019u). There have been 11 *N. angulata* individuals documented on the North Ridge Tract within the Kaluakauila MU, which is 13 percent of the statewide population (USAG-HI, 2022c).
Nototrichium humile **(kuluʻi)**: This federally and State-endangered species is an upright trailing shrub with branched stems of the *Amaranthaceae* (amaranth) family. It grows up to 5 feet long and has oppositely arranged leaves that are 1 to 4 inches long and up to 2 inches wide. It is found on ledges, slopes, or gulches in mesic forest dominated by *Diospyros* species between 1,214 and 2,690 feet in elevation. The statewide population is estimated to be between 880 and 950 individuals across 10 populations (USFWS, 2020b). There have been 8 *N. humile* individuals documented on the North Ridge Tract (4 of which were within the Kaluakauila MU), which is less than 0.01 percent of the statewide population (USAG-HI, 2022c).
Schiedea **hookeri (Sprawling schiedea)**: This federally and State-endangered species is a sprawling or clumped perennial herb of the *Caryophyllaceae* (pink) family. The stems are 1 to 2 feet and curve upward or lie close to the ground to produce matted clumps. It has thin opposite leaves that are 1 to 3 inches long and up to 0.6 inch wide. It is found in diverse mesic or dry lowland forest, frequently with *M. polymorpha* and lama dominant habitat between 1,200 and 2,600 feet in elevation. The statewide population is estimated to be up to 500 individuals across 8 populations (USFWS, 2018b). There have been two *S. hookeri* individuals documented on the North Ridge Tract within the Kaluakauila MU, which is 0.4 percent of the statewide population (USAG-HI, 2022c).
Schiedea **kealiae (maʻoliʻoli)**: This species is a federally and State-endangered short-lived perennial subshrub of the *Caryophyllaceae* (carnation) family. It has sprawling stems that ascend 0.7 to 1.6 feet and form loose clumps with lance- or elliptical-shaped opposite leaves with a prominent midrib. There are 250 individuals in a single population in the Waiʻanae mountains and small scattered populations of 1 to 10 plants in either direction of the main population (USFWS, 2019v). There has been one documented individual of *S. kealiae* on the North Ridge Tract within the Kaluakauila MU, which is 0.4 percent of the statewide population (USAG-HI, 2022c; Kawelo, 2023b).
Spermolepis hawaiiensis (Hawaiʻi scaleseed): This federally and State-endangered species is an annual herb of the Apiaceae (parsley) family. The stems are 2 to 8 inches long, and leaves are narrow and dissected growing on 1-inch-long stalks. On Oʻahu, this species typically grows in coastal dry cliff vegetation on steep to vertical cliffs or at the base of cliffs and ridges between 82 and 1,004 feet in elevation. The statewide population is estimated to be up to 8,095 individuals (USFWS, 2021h). There has been a single *S. hawaiiensis* individual documented on the North Ridge Tract, which is 0.01 percent of the statewide population, and two individuals documented on the South Ridge Tract (one within the Lower ʻŌhikilolo MU), which is also 0.01 percent of the statewide population (USAG-HI, 2022c).

Table H-12: Protected Species Documented on State-Owned Land at MMR
Mammals
***Aeorestes semotus* (Hawaiian Hoary Bat, 'ōpe'ape'a)**: In Hawai'i, observations of the Hawaiian hoary bat have occurred in native, non-native, developed, and agricultural areas between sea level and 7,500 feet. There is potential roosting habitat for Hawaiian hoary bat at MMR. No Hawaiian hoary bat roosts have been observed or detected at MMR, but passive acoustic detection of the bat has occurred at seven MMR locations; none of the detections were over State-owned land (UH & USGS, ND). ANRPO staff conduct spot surveys for bats roosting in trees that need to be pruned or removed at Army installations during the bat pupping season each year. During 2021, 57 bat surveys were conducted over 39 hours and 347 trees were screened (ANRPO, 2021). While there are no population estimates for this species, according to the 2018 USFWS 5-Year Status Review for Hawaiian hoary bat, the species has been confirmed to be widely distributed and breeding on O'ahu (USFWS 2021a).

Table H-13: MMR Invasive Plant Species		
Scientific Name	**Common, Local**	**Key**
Acacia farnesiana	sweet acacia	–
Acacia mearnsii	black waddle	1, 2, 4
Achyranthes aspera	devil's horsewhip	1
Araucaria columnaris	Cook pine	1
Axonopus compressus	broad leaf carpet grass	1
Bidens pilosa	hairy beggar ticks	–
Casuarina equisitifolia	Australian pine	1
Casuarina glauca	ray she oak	1
Cenchrus setaceus	fountaingrass	1, 2, 4
Cirsium vulgare	bull thistle	1
Clidemia hirta	soap bush	2
Desmodium intortum	green leaf tick trefoil	1
Ehrharta stipoides	meadow rice grass	1
Erigeron karvinskianus	Latin American fleabane	–
Fraxinus uhdei	tropical ash	1
Grevillea robusta	silk oak	–
Kalanchoe pinnata	cathedral bells	–
Lantana camara	lantana	–
Melinis minutiflora	molasses grass	–
Montanoa hibiscifolia	tree daisy	2
Myrica faya	fire tree, faya tree	1, 2, 4
Nephrolepis multiflora	Asian sword fern	1
Panicum maximum	Guinea grass	–
Paspalum conjugatum	hilo grass	–
Pluchea carolinensis	sour bush, cure for al	–
Prosopis pallida	kiawe, algaroba, mesquite	3
Psidium cattleianum	strawberry guava	4
Psidium guajava	guava	–
Roystonea regia	royal palm, Cuban palm	1
Rubus argutus	sawtooth blackberry	1, 2, 4
Schinus terebinthifolius	Brazilian pepper tree	4

Table H-13: MMR Invasive Plant Species		
Scientific Name	**Common, Local**	**Key**
Syzygium cumini	Java plum	–
Syzygium jambos	rose apple	1
Toona ciliata	Australian red cedar	–
Triumfetta semitriloba	bur	2

1. Controlled and eradicated when found in protected plant species areas
2. State-listed noxious weed list
3. Federal noxious weed list
4. Hawai'i Invasive Species Council Invasive species list

Source: USAG-HI, 2010b; Kawelo 2022a; USDA 2003; HISC, 2022; USDA, 2012; OISC, 2022

Appendix I

Historic and Cultural Resources Literature Review

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FINAL—Historic and Cultural Resources Literature Review for Army Training Land Retention of State Lands in Makua Military Reservation, Kahuku Training Area, and Kawailoa-Poamoho Training Area, Island of Oʻahu, Hawaiʻi

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

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Kleinfelder Project No: 20212626.001A

September 22, 2023

MANAGEMENT SUMMARY

At the request of Group 70 International, Inc., and on behalf of the U.S. Army Corps of Engineers, Honolulu District, Kleinfelder, Inc. conducted a literature review of previously recorded historic and cultural resources for the Army Training Land Retention of State Lands Project at Makua Military Reservation, Kahuku Training Area, and Kawailoa-Poamoho Training Area, Island of Oʻahu, Hawaiʻi, a proposed action under the National Environmental Protection Act. The Proposed Action does not involve new training, construction, or resource management activities at these installations. Instead, it is a real estate/administrative action that would enable continued military use of the State-owned lands.

The current study consists of background archival research, a records search at the State Historic Preservation Division Library in Kapolei, and a review of cultural resource study reports and geographic information system data on file with the U.S. Army Garrison-Hawaii to compile baseline conditions regarding historic and cultural resources within the State-owned lands. The results of this literature review and desktop analysis aim to support an EIS being prepared for the Proposed Action, which will analyze impacts on the historic and cultural resources identified in this document.

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1 INTRODUCTION

At the request of Group 70 International, Inc. (G70), and on behalf of the U.S. Army Corps of Engineers, Honolulu District (USACE), Kleinfelder, Inc. conducted a literature review of previously recorded historic and cultural resources for the U.S. Army Training Land Retention (ATLR) of State Lands project on the Island of Oʻahu, Hawaiʻi, a proposed action under the National Environmental Protection Act. Several State-owned parcels currently leased by the U.S. Government, referred to in the EIS and throughout the current document as State-owned lands or the Region of Influence (ROI), are the subject of the current study (Figure 1). These parcels include portions of Makua Military Reservation (MMR) (Figure 2), Kahuku Training Area (KTA) (Figure 3), and Kawailoa-Poamoho Training Area (Poamoho), situated within the southern portion of the larger Kawailoa Training Area (KLOA) (Figure 4).

G70 is preparing an Environmental Impact Statement (EIS) for the ATLR of State Lands project, which does not involve new training, construction, or resource management activities at these installations. Instead, it is a real estate/administrative action that would enable continued military use of the State-owned lands. The EIS evaluates the potential impacts of a variety of alternatives that meet the purpose and need of the project. Alternatives analyzed in the EIS include 1) Full Retention, 2) Modified Retention, 3) Minimum Retention and Access, and 4) a No Action Alternative (no retention of State-owned land after the term of the current lease in 2029).

The current study consists of background archival research, a records search at the State Historic Preservation Division Library in Kapolei, and a review of cultural resource study reports and geographic information system data on file with the U.S. Army Garrison-Hawaii to compile baseline conditions regarding historic and cultural resources located within or partially within the State-owned lands. The discussion of previously conducted cultural resource studies in this report is not comprehensive since it is limited to reports provided and approved for use by the USAG-HI. GIS data on site locations and boundaries was also provided by USAG-HI. The results of this literature review and desktop analysis aim to support the EIS being prepared for the Proposed Action, which will analyze impacts on the historic and cultural resources identified in this document.

1.1 PROJECT OVERVIEW

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

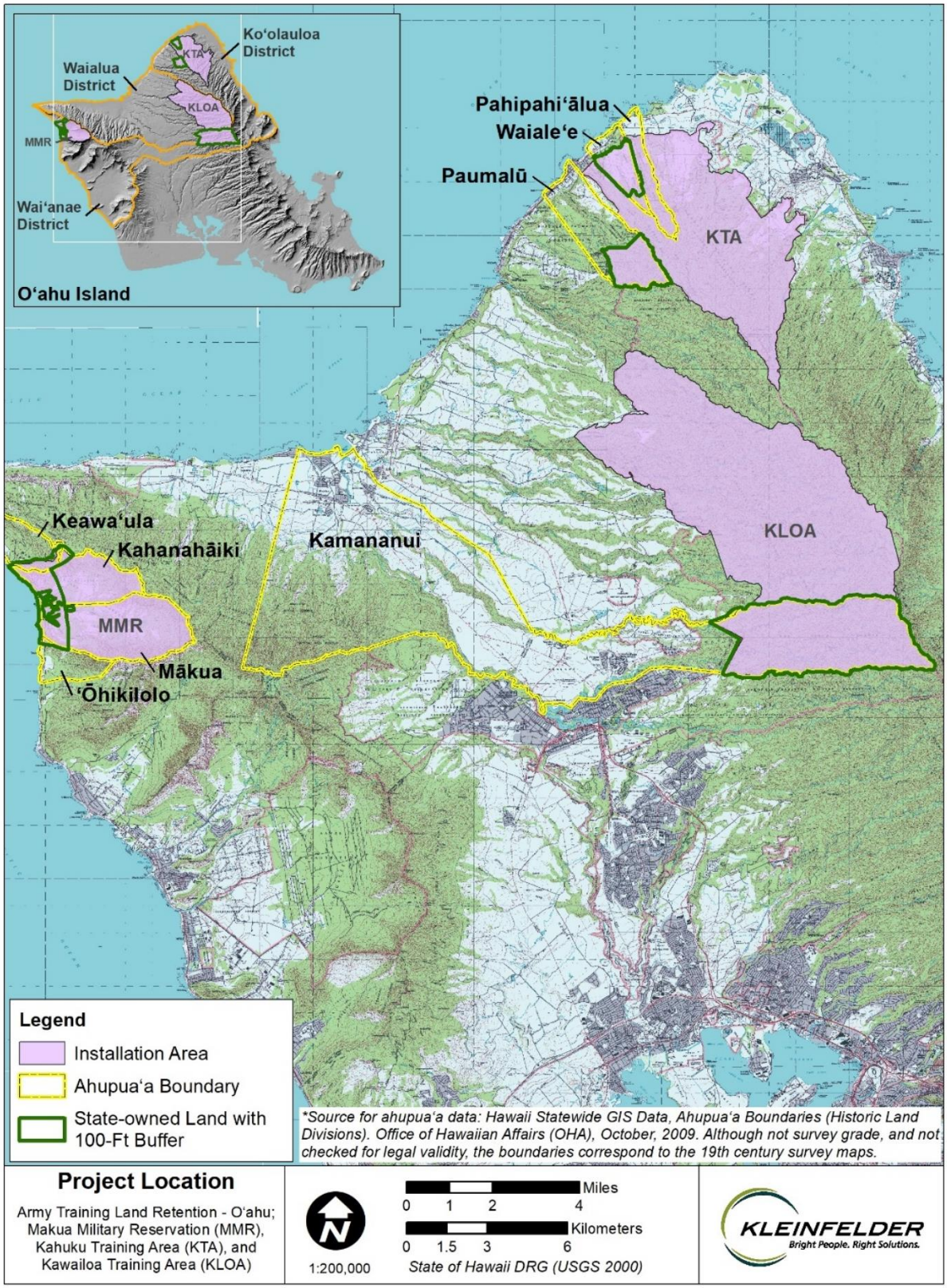


Figure 1. Overview of ROI locations on 2000 USGS DRG quadrangle.

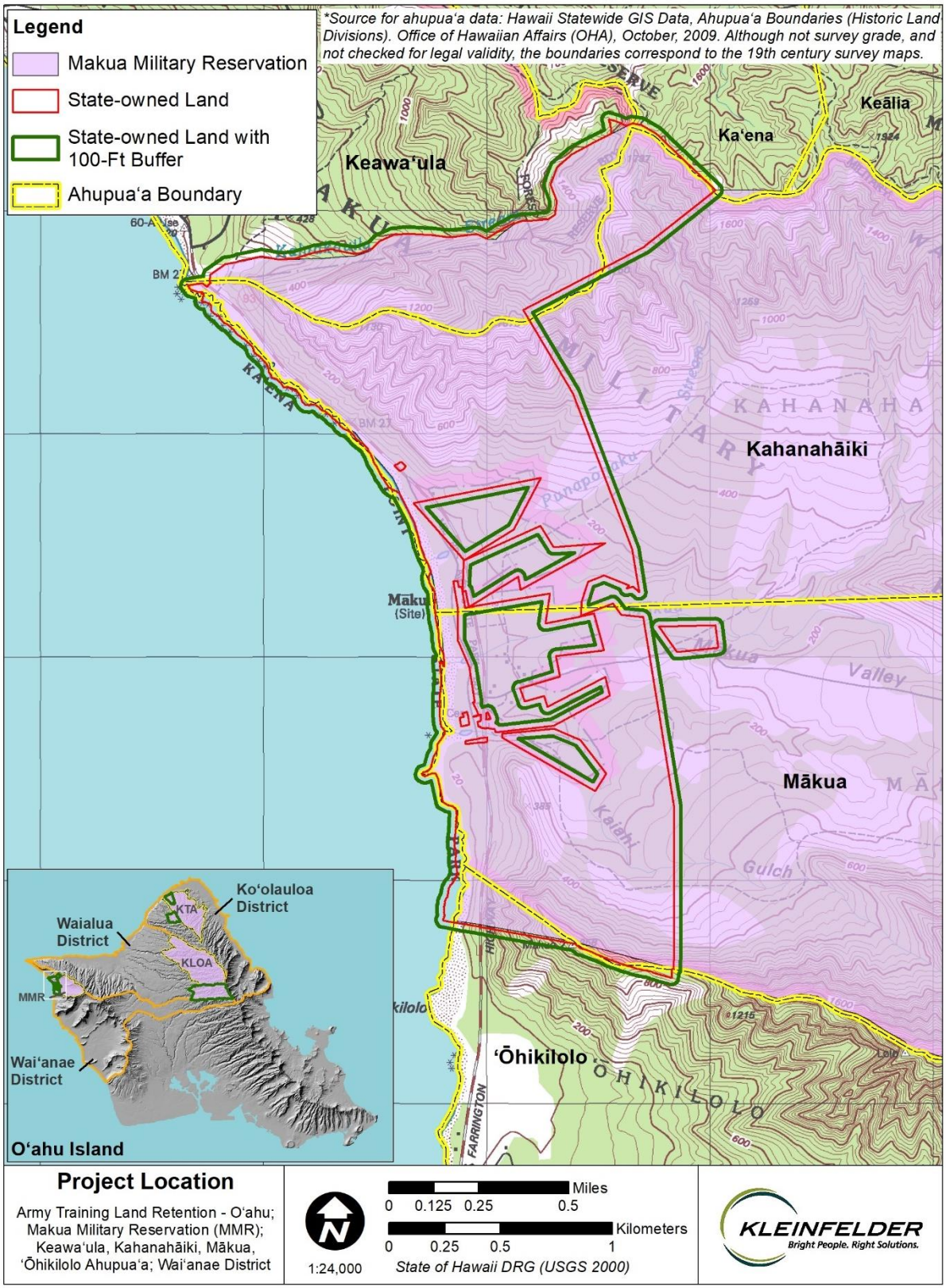


Figure 2. State-owned land and expanded 100-foot buffer for MMR depicted on 2000 USGS DRG quadrangle.

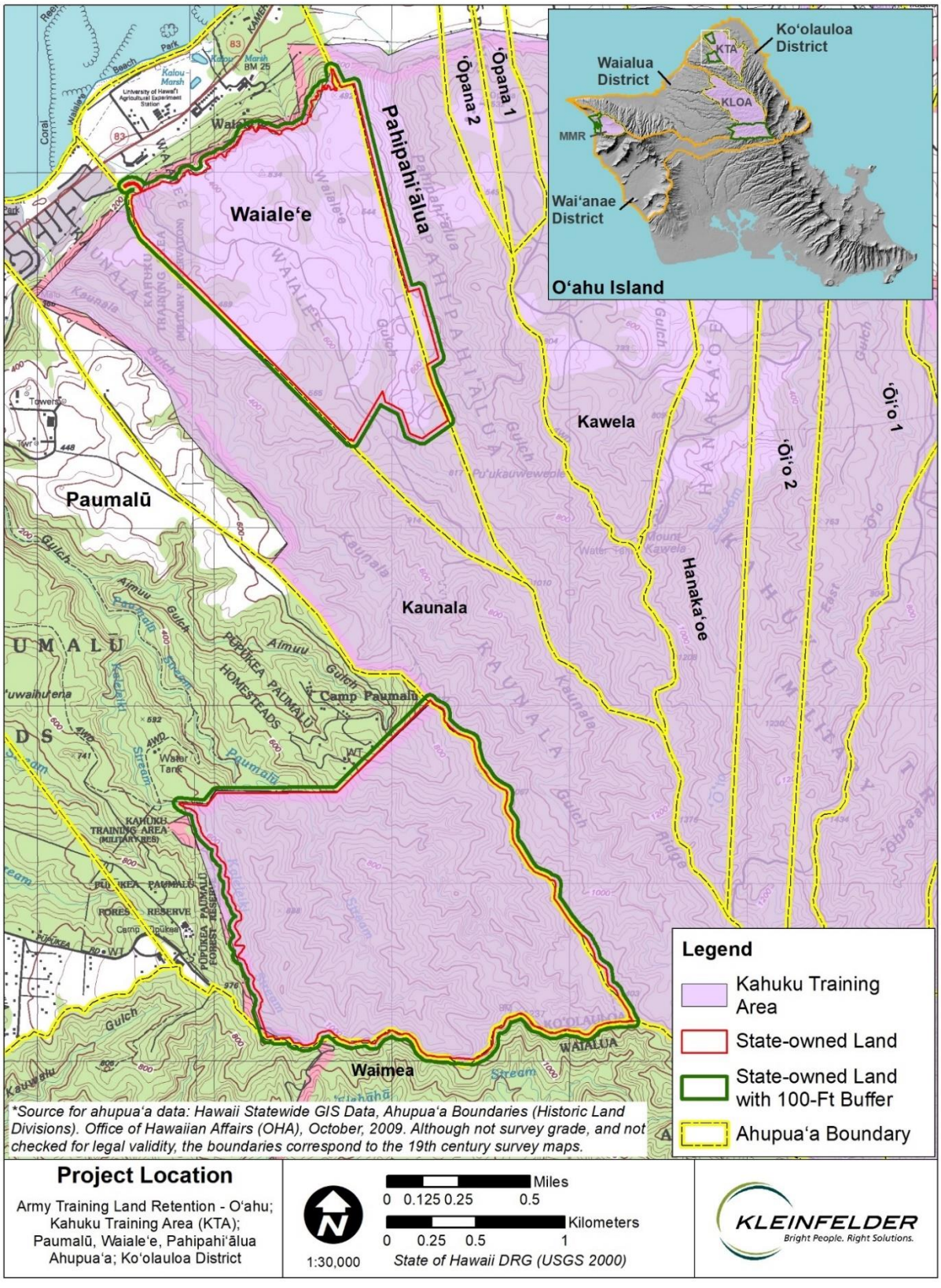


Figure 3. State-owned land and expanded 100-foot buffer for KTA depicted on 2000 USGS DRG quadrangle.

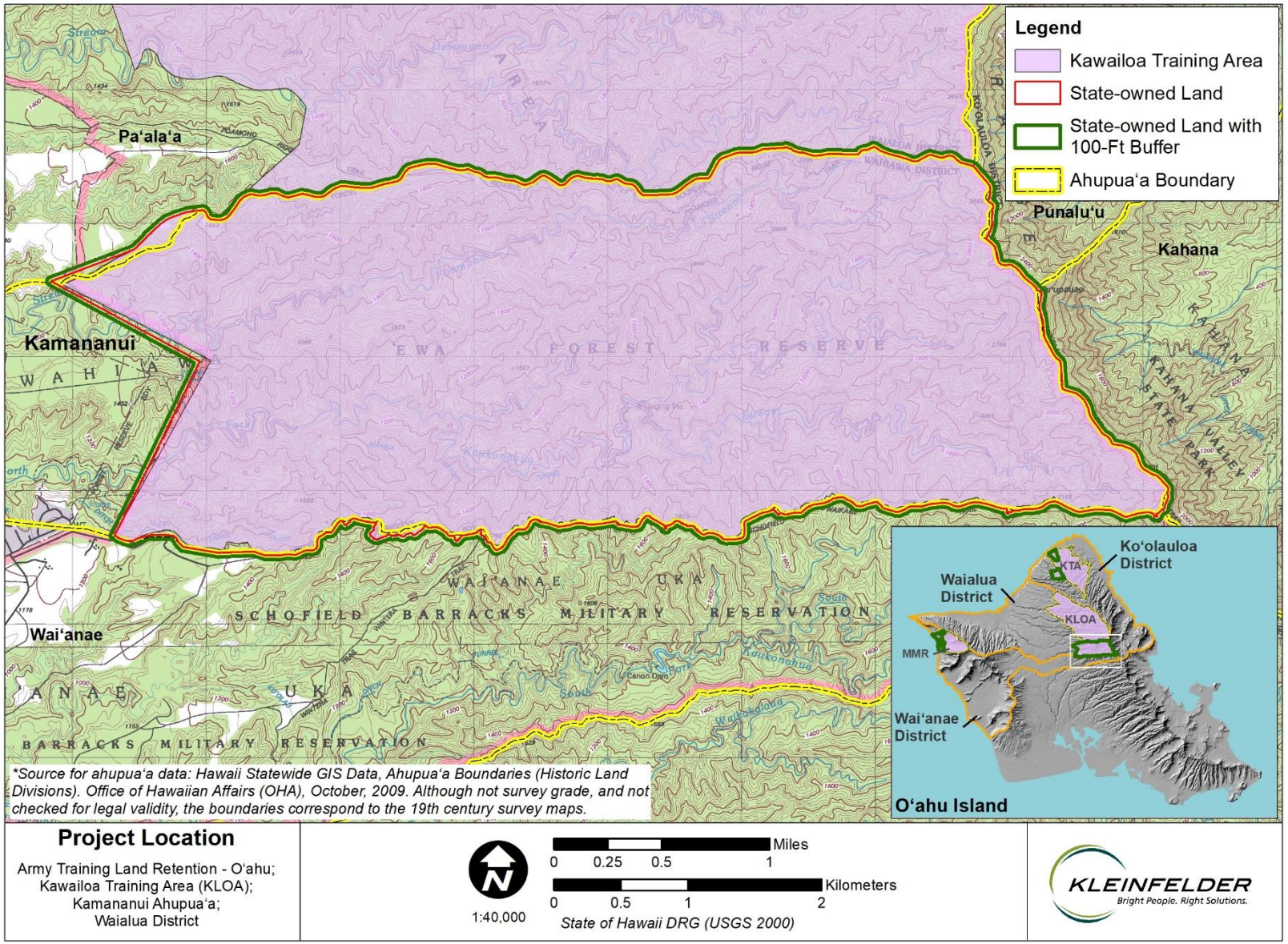


Figure 4. State-owned land and expanded 100-foot buffer for Poamoho depicted on 2000 USGS DRG quadrangle.

1.2 REGULATORY FRAMEWORK

The Proposed Action requires compliance with the National Environmental Policy Act of 1969 (NEPA). NEPA requires federal agencies to examine the direct and indirect environmental impacts that may result from the Proposed Action and alternatives, including potential impacts to "historic and cultural resources" (42 United States Code 1502.16(a)(8)). NEPA requirements ensure that environmental information is available to public officials and citizens for review before decisions are made and before actions are taken. The EIS will address relevant laws and regulations to provide decision makers with a comprehensive overview of the regulatory issues associated with the Army's Proposed Action.

The Army is initiating the EIS process under the Council on Environmental Quality NEPA implementing regulations in Title 40 Code of Federal Regulations (CFR) Parts 1500–1508, and Army NEPA implementing regulations in Title 32 CFR Part 651. The EIS will also fulfill the Hawaii EIS statute and implementing rule, codified in Hawaii Revised Statutes (HRS) Chapter 343 and Hawaii Administrative Rules (HAR) Chapter 11-200-1. Collectively, the Hawaii statute and rule are referred to as the "Hawaii Environmental Policy Act (HEPA)." Like NEPA, HEPA requires disclosure of the direct and indirect effects of a Proposed Action and alternatives on the environment, including "natural and human-made resources of historic, archaeological, or aesthetic significance" (HAR 11-200-17).

This document is meant to support the NEPA review process by compiling background information on existing conditions of historic and cultural resources (see Section 1.4 below for definitions of historic and cultural resources) known to exist within the State-owned lands. This document will be appended to the EIS as a contributing technical study. The effects on cultural practices, areas of traditional importance, and intangible cultural resources are evaluated through a cultural impact assessment (CIA) (Craft et al. 2023) prepared in accordance with the Hawaii Office of Environmental Quality Control "Guidelines for Assessing Cultural Impacts" (adopted November 19, 1997). The Army has contracted for the completion of a CIA in support of the HEPA requirement through a separate technical study.

1.3 STUDY AREA DESCRIPTION

The Study Area for historic and cultural resources consists of approximately 6,322 acres of State-owned lands within three Army installations that are currently leased by the U.S. Government. The Study Area encompasses eight complete and four partial Tax Map Key (TMK) parcels, as detailed for each installation below. The Study Area is alternatively referred to as the ROI, which represents the extent of the geographical area that could be impacted by the Proposed Action.

1.3.1 Makua Military Reservation (MMR)

The ROI for MMR comprises approximately 982 acres, situated along the Waiʻanae Coast of Oʻahu in the western portion of MMR and within the Waiʻanae District. The ROI for MMR is situated within four

ahupuaʻa: Keawaʻula, Kahanahāiki, Mākua, and ʻŌhikilolo; it encompasses five TMK parcels (TMKs [1] 8-1-001:008 and [1] 8-2-001:001, 022, 024, and 025) and portions of four parcels (TMKs [1] 6-9-003:001, [1] 8-1-001:007 and 012, and [1] 8-2-001:002) (Figure 5). The MMR parcels are also referred to as the Makai, North Ridge, Center, and South Ridge Tracts.

1.3.2 Kahuku Training Area (KTA)

The ROI for KTA is located near the northern tip of Oʻahu within the Koʻolauloa District and encompasses two discontiguous TMK parcels (TMK [1] 5-8-002:002 and [1] 5-9-006:026) totaling approximately 1,268 acres (Figure 6). The northern parcel (Tract A-1) is situated within the northern portion of KTA and is comprised of an approximately 496-acre parcel located in Waialeʻe Ahupuaʻa, with a small portion extending east into Pahipahiʻālua Ahupuaʻa. The southern parcel (Tract A-3) is situated along the western KTA boundary and is comprised of an approximately 772-acre parcel located in Paumalū Ahupuaʻa.

1.3.3 Kawailoa-Poamoho Training Area (Poamoho)

The ROI for Kawailoa-Poamoho Training Area (Poamoho), located within the southern portion of the larger KLOA, comprises approximately 4,582 acres and is situated within the interior portion of Oʻahu Island in the Waialua District; it encompasses one TMK parcel (TMK [1] 7-2-001:006) within Kamananui Ahupuaʻa (Figure 7). The ROI for Poamoho extends west from the summit of the Koʻolau Mountains to the eastern boundary of Wahiawā. The eastern portion of the ROI for Poamoho is also referred to as the Natural Area Reserve (NAR) Tract (established by Hawaii Board of Land and Natural Resources in 2005), while the remaining western portion is referred to as the Poamoho Tract.

1.4 DEFINITION OF HISTORIC AND CULTURAL RESOURCES

NEPA analysis considers impacts to "unique characteristics of the geographic areas such as proximity to historic or cultural resources" [40 CFR Section 1508.27(b)(3)] as well as "the degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places [NRHP] or may cause loss or destruction of significant scientific, cultural, or historical resources" [40 CFR Section 1508.27(b)(8)]. Potential impacts to the relationship of people to their environment (40 CFR Section 1508.14) include cultural and historical resources [40 CFR Section 1508.1(g)(1)].

Most resources that are cultural or historical in nature are defined by several federal laws as historic properties under the NHPA (districts, sites, buildings, structures, or objects eligible for, or listed in the NRHP); as archaeological resources as defined by ARPA; or human remains (iwi kūpuna) and cultural items as defined by the Native American Graves Protection and Repatriation Act (NAGPRA). Cultural resources considered in this document, therefore, include those associated with Traditional Hawaiian and historical items and sites, buildings and structures, and other physical remains.

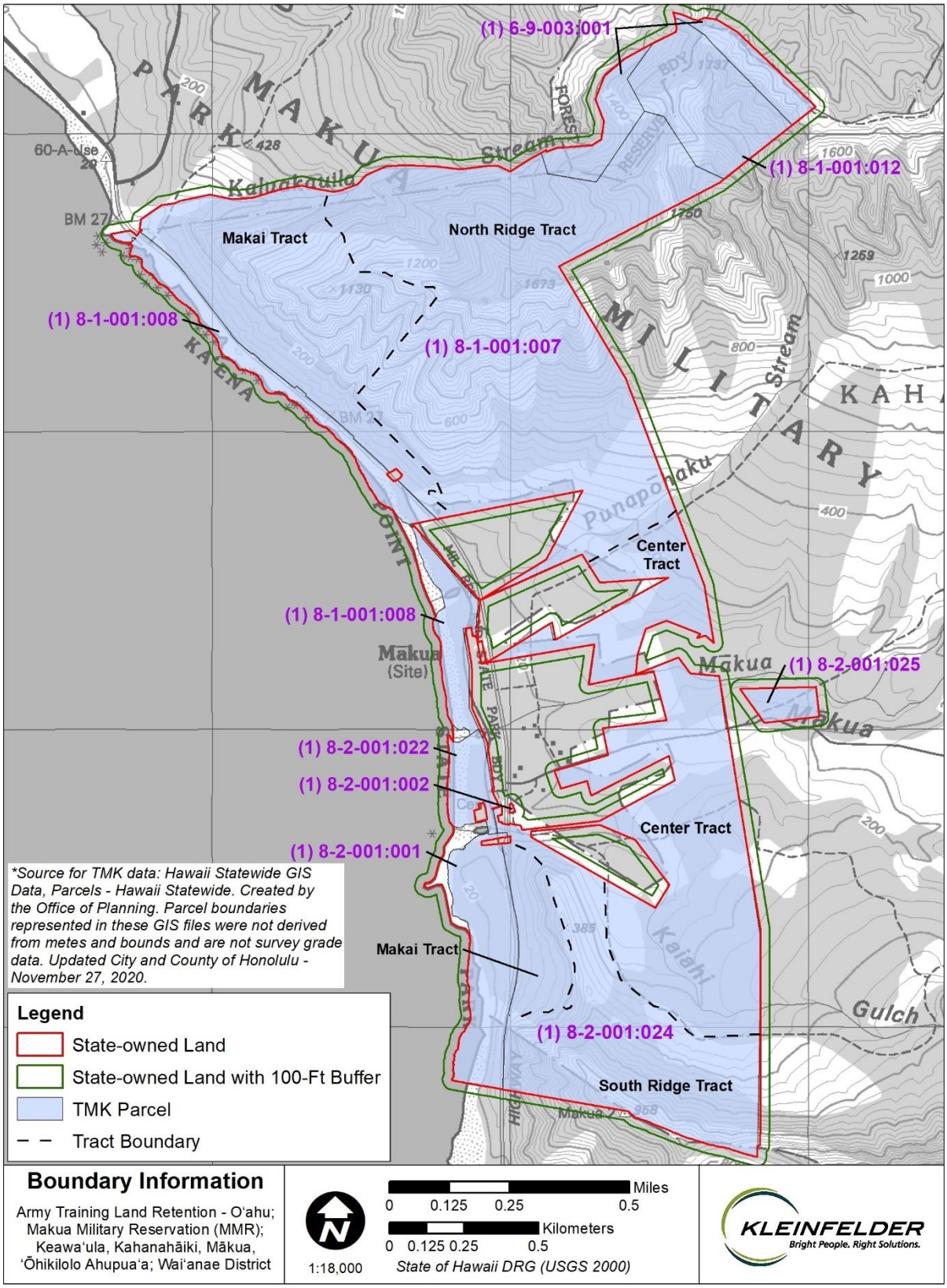


Figure 5. TMK and Tract information within the State-owned land at MMR.

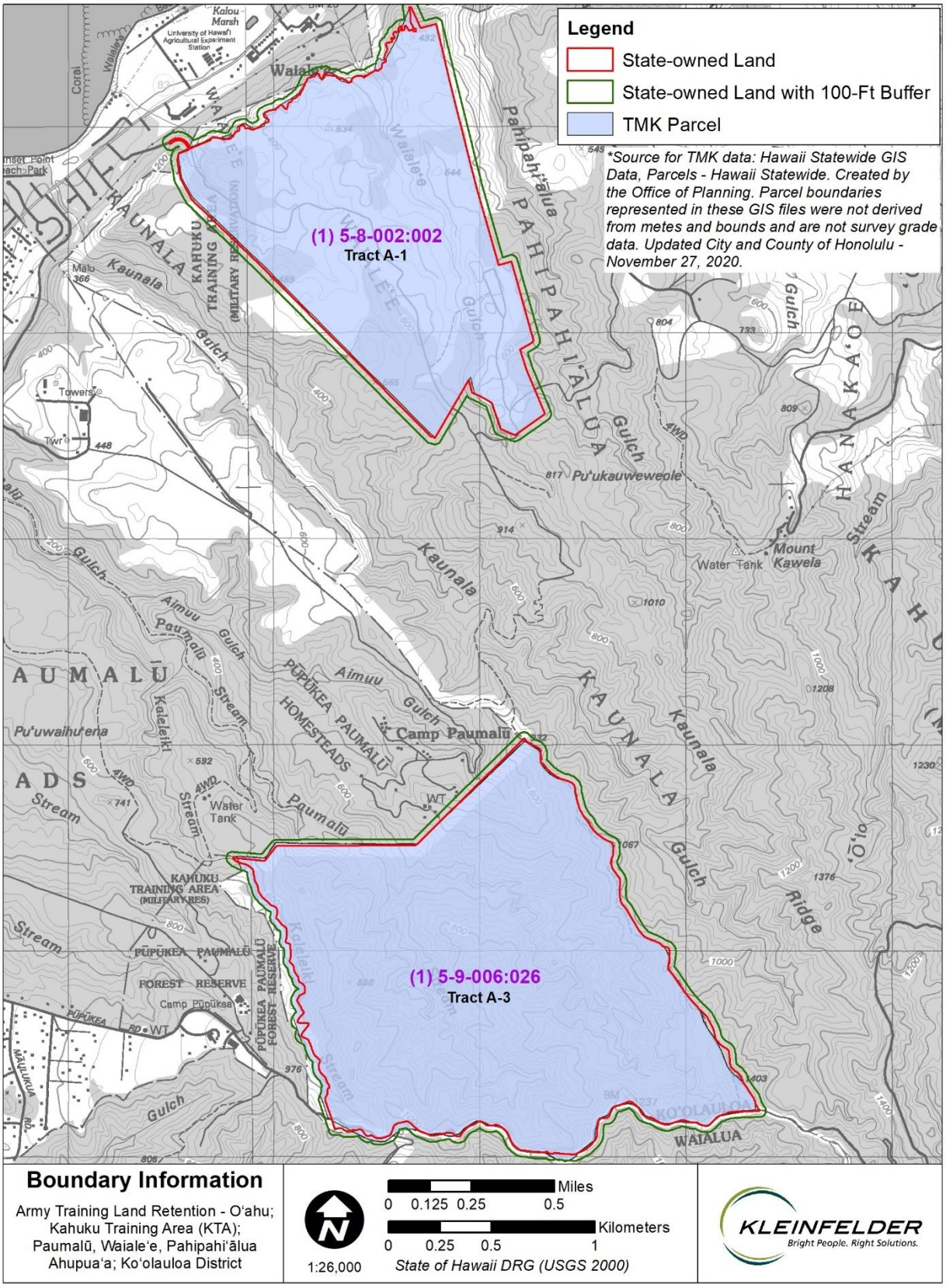


Figure 6. TMK and Tract information within the State-owned land at KTA.

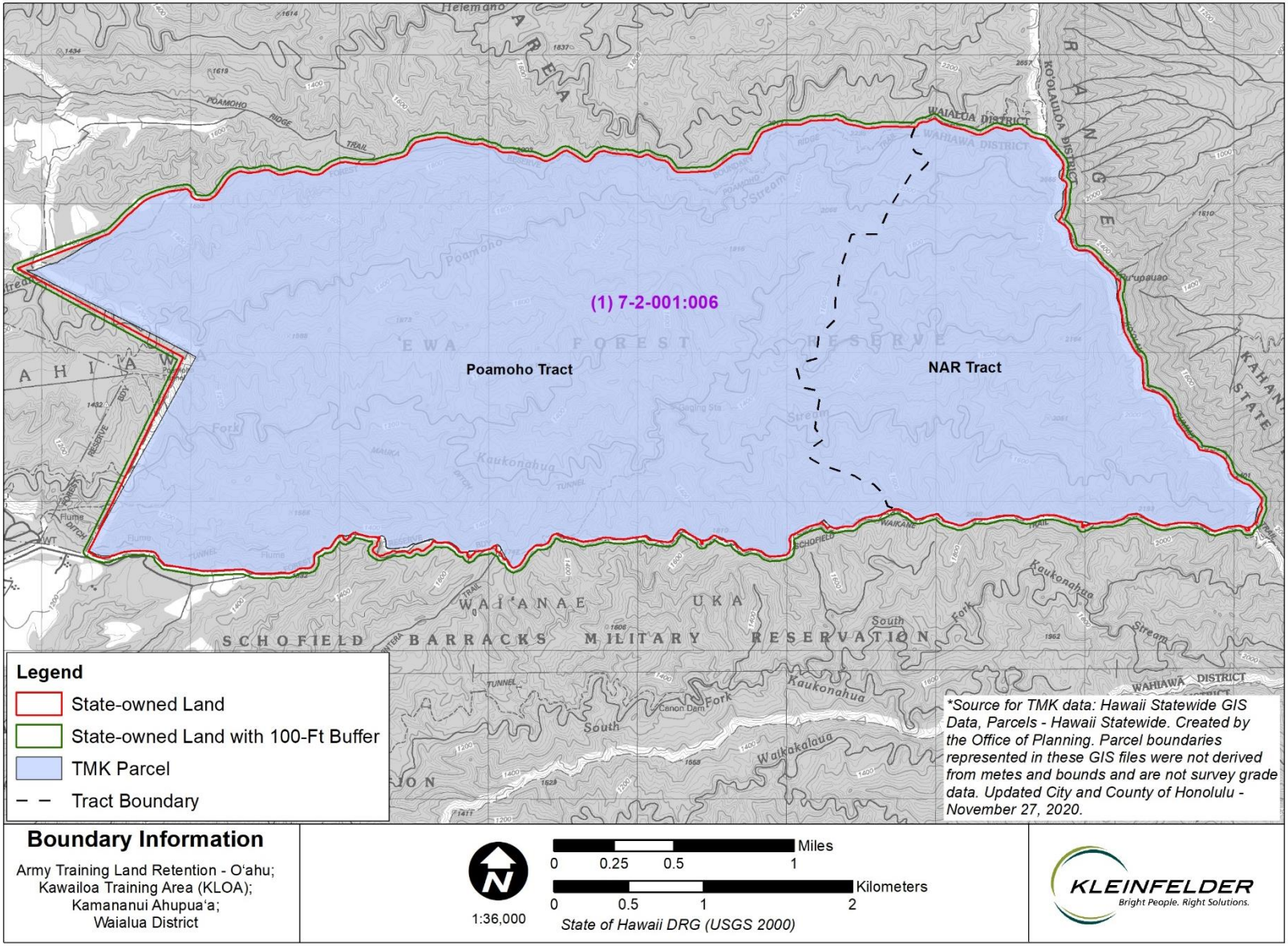


Figure 7. TMK and Tract information within the State-owned land at Poamoho.

2 BACKGROUND

The following background information establishes the environmental and historical setting of the individual ROIs for MMR, KTA, and Poamoho. This information provides a contextual framework for assessing current conditions and conducting an environmental analysis for the project EIS.

2.1 MAKUA MILITARY RESERVATION (MMR)

This section provides the environmental and historical background for the approximately 982-acre ROI for MMR within the Waiʻanae District.

2.1.1 Environmental Context

The ROI for MMR is situated at the western edge of MMR along the western coast of Oʻahu and extends approximately 3.4 kilometers (2.1 miles) along the coastline and roughly one and a half kilometers (0.93 mile) inland into the lower Mākua and Kahanahāiki valleys (see Figure 2). The southern portion of the ROI for MMR is in Mākua Ahupuaʻa, with a small portion extending into ʻŌhikololo Ahupuaʻa while the northern portion is in Kahanahāiki Ahupuaʻa, with a small portion extending into Keawaʻula Ahupaʻa. The ROI for MMR is situated within the Waiʻanae District along the rim of a volcanic caldera remnant which forms the western portion of Oʻahu. Elevations within the ROI for MMR range from sea level to approximately 522 meters (1,715 feet) above mean sea level (amsl), while annual rainfall averages around 883 millimeters (34.75 inches) (Giambelluca et al. 2013). Vegetation communities comprised of grasses, shrubs, and dispersed trees, such as kiawe (*Prosopis pallida*), koa haole (*Leucaena glauca*), and ʻilima (*Sida fallax*), are typical of the arid leeward rangelands of Oʻahu. Three intermittent streams flow from the mauka portions of MMR: Punapohāku Stream (on the north side of Kahanahāiki Valley), and Mākua and Kalena streams (in the northern and southern portions of Mākua Valley). Steep, rocky, and stony lands represent approximately 76 percent of the ROI for MMR. Soils mapped within the remaining portions of the ROI include Ewa silty clay loam, Kemoo silty clay, Lualualei extremely cobbly clay, Mamala cobbly silty clay loam, Pulehu stony/very stony clay loams, and Beaches (Figure 8). These soils are mainly present along the upper and lower elevations of the ROI, and in drainages.

2.1.2 Traditional Land Use

Traditional Hawaiian populations in Mākua and Kahanahāiki Ahupuaʻa at the time of Western contact are estimated to have been around 300 to 400 (Kelly and Quintal 1977:33) or 420 individuals (Cordy 2002). Traditional communities along the Mākua coastal region were therefore sparse and were supported by dryland cultivation of ʻuala (*Ipomoea batatas*, sweet potato), as attested by ethnographic accounts (Handy and Handy 1991:275). ʻUala, kalo (*Colocasia esculenta*, taro), and pili grass (*Heteropogon contortus*) have all been documented as important resources in the wider Mākua Valley (Kelly and Quintal 1977:16,18); although, how much they were cultivated in the direct ROI for MMR is unknown.

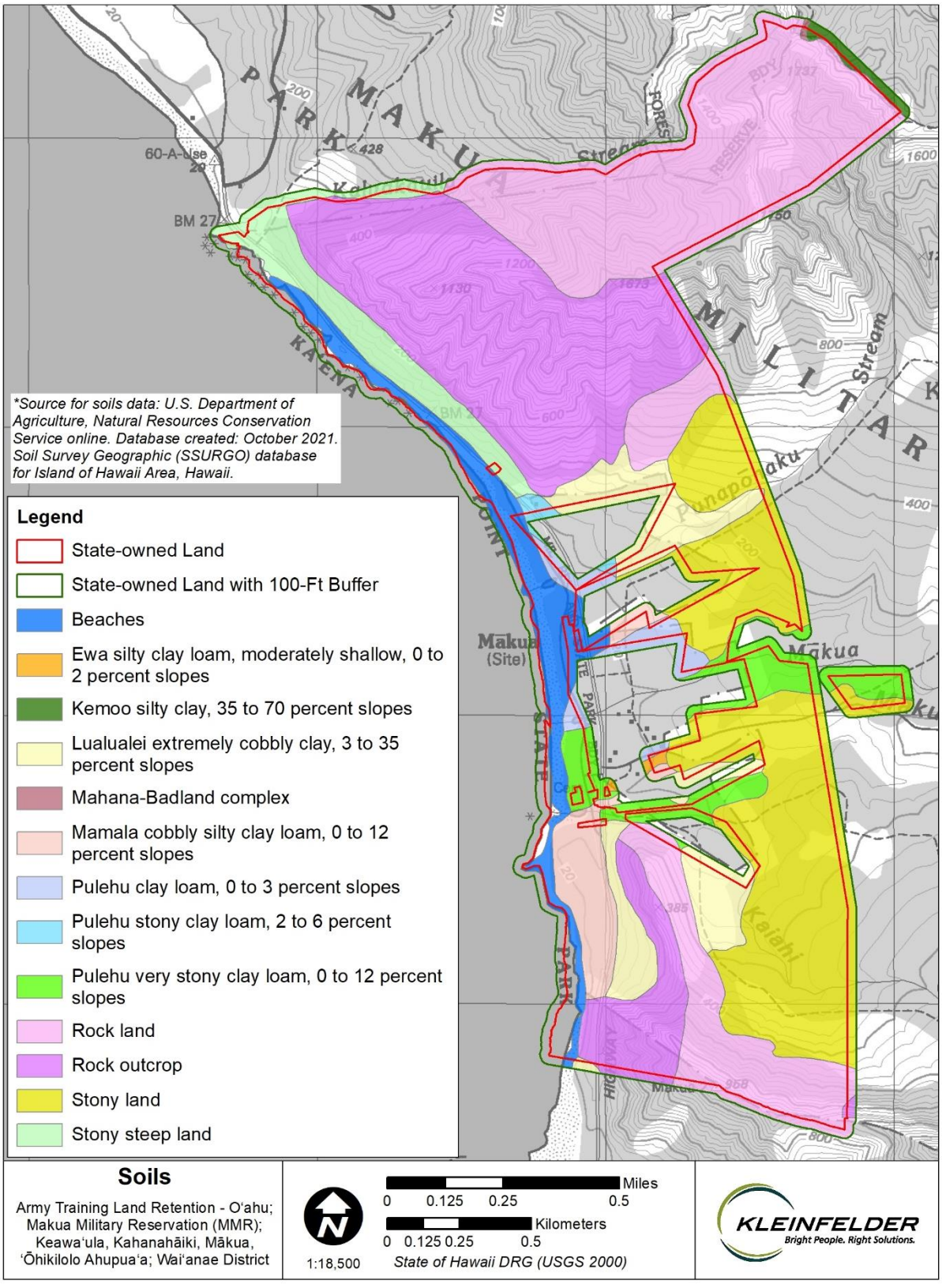


Figure 8. Soils mapped within the ROI for MMR.

Marine resources along the shore west of MMR were rich with both pelagic and near-shore species, which would have been harvested along with shellfish and various species of limu (seaweed). Aquaculture, in the form of loko iʻa (fishponds) that were used to trap and grow certain fish species as well as to cultivate limu, was also practiced along the coastal regions of Waiʻanae, although not within the ROI itself.

While specific references to direct traditional use of the ROI for MMR are minimal, several traditional landmarks are known within the State-owned land. Mākua Beach, located in the central portion of the ROI for MMR, was recognized as a favorable canoe landing spot (ʻIʻi 1983:98; Kelly and Quintal 1977:4). Kāneana Cave, now known as Mākua Cave (SIHP Site 50-80-03-0177), located in the southern portion of the ROI for MMR, is mentioned in several moʻolelo (McAllister, in Sterling and Summers 1978:81) and was certainly recognized as a significant feature by native inhabitants of the region.

Appendix B (Cultural Impact Assessment) of the EIS for ATLR on Oʻahu contains additional information on traditional land use at MMR (Craft et al. 2023).

2.1.3 Early Historic Period Accounts

An early historical account of Mākua by Levi Chamberlain in the 1820s describes it as a small treeless coastal settlement planted with ʻuala and kō (*Saccharum officinarum*, sugarcane):

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

From 1815 to 1826, sandalwood was intensely harvested from the Waiʻanae Mountains (Kamakau 1992). Chamberlain also described the ruins of a hut observed in 1828 in the upper reaches of Mākua Valley, “built apparently not long since for the accommodation of sandal wood cutters” (Chamberlain 1957:37). Whether sandalwood harvesting was conducted within the specific boundaries of the State-owned land is not known.

Traditional communities along the Waiʻanae Coast during the decades following Euro-American contact continued to be small. An 1826 sketch of Mākua by Hiram Bingham (Figure 9) depicts a small coastal community near the shore and a few scattered structures mauka or inland and upland from the shore. Green (1980:20–21) described Mākaha Valley, just a few miles to the south of the ROI for MMR, as “a hamlet in a small grove of coconut trees on the Keaʻau side of the valley, some other scattered houses, a few coconut trees along the beach, and a brackish water pool that served as a fish pond, at the mouth of the Mākaha Stream.”

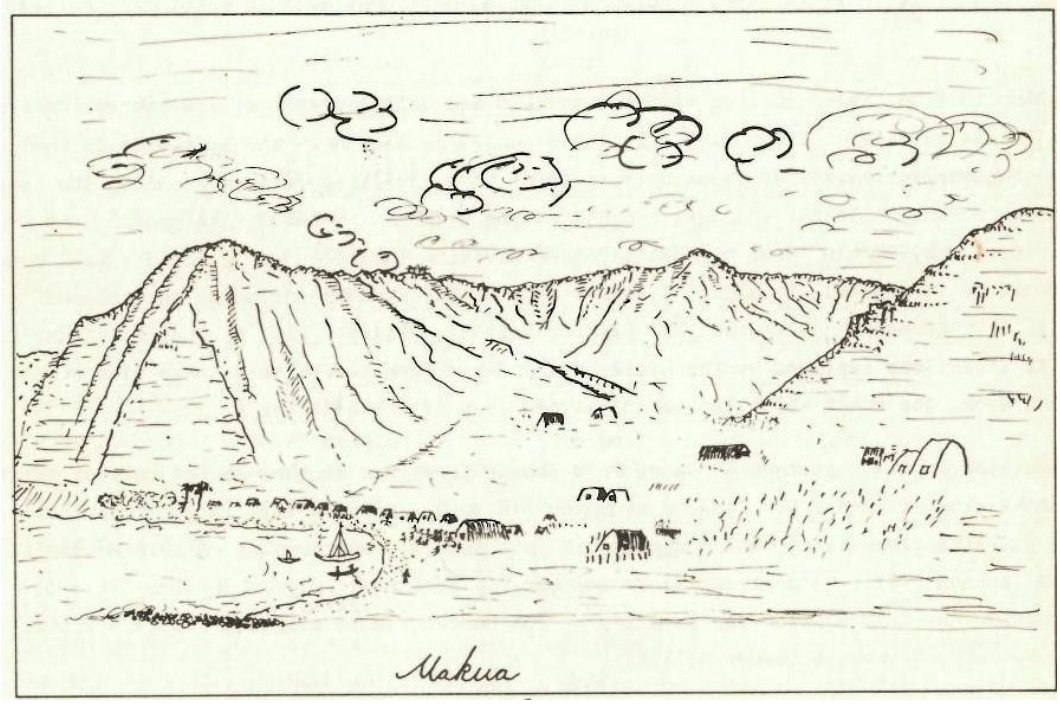


Figure 9. Bingham's 1826 sketch of Mākua Valley, from Green (1980:9).

References to professional robbers in Mākua, and the Wai'anae Coast in general, are found in ethnographic accounts of traditional activities (Beckwith 1940; Fornander 1918; 'I'i 1983). These robbers, sometimes referred to as 'Ōlohe or ha'a, people trained in the art of wrestling and lua (bone breaking), were said to lay in wait along the cliffs above the coastal trails between Mākaha and Ka'ena to rob and kill travelers.

2.1.4 The Māhele 'Āina and Land Tenure Change

The 1848 Māhele 'Aina eliminated the Traditional Hawaiian land tenure system in favor of the western concept of fee-simple land ownership; this would have far reaching consequences on Hawai'i's cultural landscape. All land in the Kingdom of Hawai'i was placed into one of three categories: Crown Lands, Government Lands, or Konohiki Lands. During the Māhele, Hawaiian chiefs and konohiki (heads of land divisions) were required to present land claims to the governmental Land Commission in the hopes of receiving a Land Commission Award (LCA) title for the land quit-claimed to them by Kamehameha III. Until an award was issued, the land title remained with the government. Award of an LCA gave complete title to the subject lands, although the government still had a right to commutation. A commutation could be settled by a cash payment or by a land exchange of equal value. If successful, a Royal Patent was then issued by the minister of the interior. A Royal Patent quitclaimed the government's interest in the land and served as proof that the government's right to commutation no longer existed.

The “Second Great Māhele” or Kuleana Act of 1850 bolstered private land ownership even further by permitting maka‘āina, or commoners, to own land as well as foreign-born individuals. The Act’s restrictions, however, made it difficult to receive a land award, which discouraged Hawaiians who did not actively cultivate land. The Act of August 10, 1854 later dissolved the Land Commission but stated, “a Land Commission Award shall furnish as good and sufficient a ground upon which to maintain an action for trespass, ejectment, and other real action, against any person or persons, whatsoever, as if the claimant, his heirs or assigns, had received a Royal Patent for the same” (Chinen 1958:14). An LCA recipient was thus still protected if they had not obtained a Royal Patent (Chinen 1958:13–14).

Overall, the Māhele and subsequent land ownership regulations marked a key shift in Hawaiian land use history and ushered in a drastic transformation from a redistributive economy to a market-based system. This facilitated the rapid decline of native land tenure and led to the acquisition of land by wealthy foreign investors.

2.1.4.1 LCA and Kuleana Claims

As a result of the 1848 Māhele, a total of 19 land claims were awarded in two of the four ahupua‘a within the ROI for MMR: 10 in Mākua comprising 111 acres and 9 in Kahanahāiki comprising 70 acres (Kelly and Quintal 1977:32). Only one LCA (LCA 9052:1) is situated within the ROI, which was awarded to Kahueai in 1851 as Grant 461. LCA 9052:1 mentions the word “kula”, likely a reference to cultivated land, while LCA 9052:2, located outside the ROI, is described as an “enclosed house lot”. Several other land claims awarded in the vicinity of the ROI also contained multiple, discontiguous ‘āpana (land parcels). The sizes and distribution of these indicate the smaller ‘āpana were used primarily for habitation, while the larger upland ‘āpana were used for farming or ranching (Figure 10). This is evident in the description of LCA 9055, associated with two ‘āpana bounded by the ROI, which mentions a house within the smaller coastal parcel (9055:2) and ranching type structures (rock walls and an enclosure) on the upland ‘āpana (9055:5).

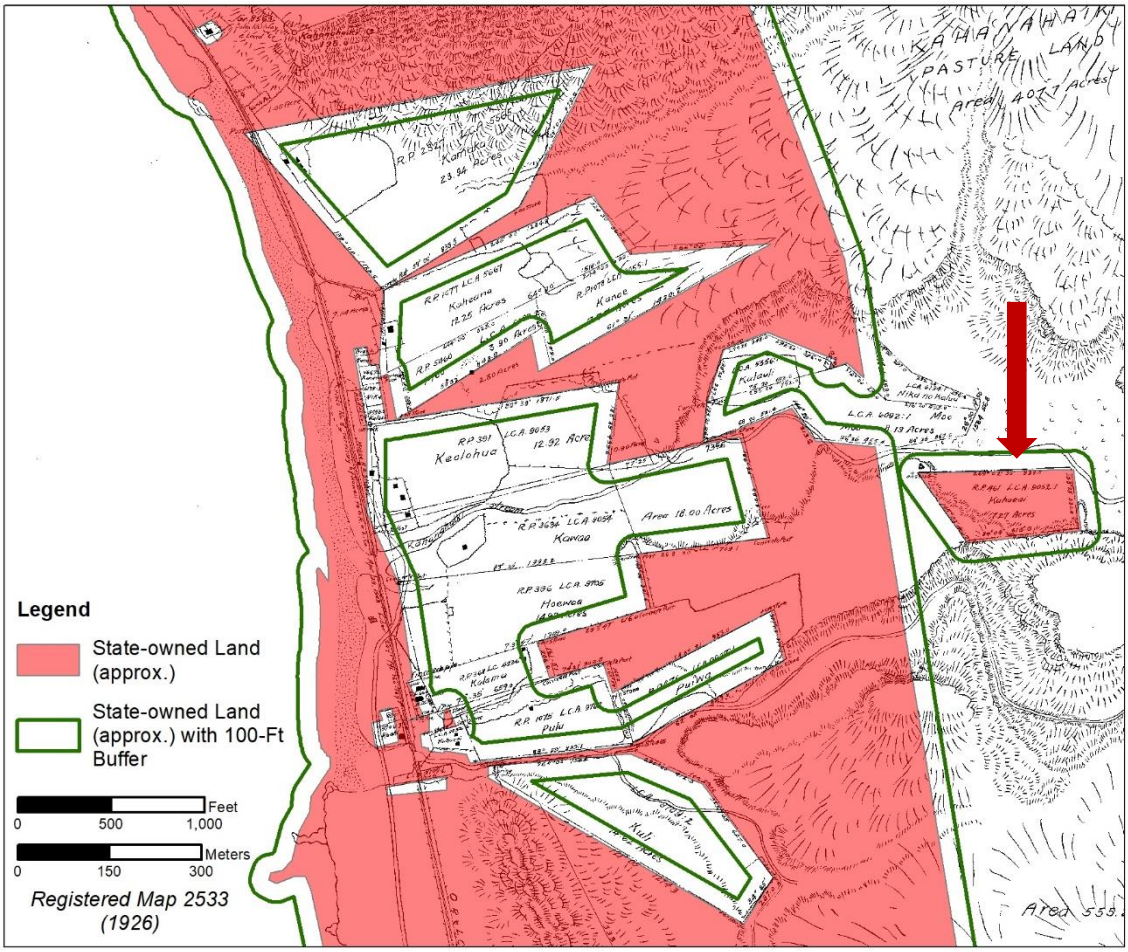


Figure 10. Portion of Hawai'i Registered Map 2533 (Wall 1926) depicting LCA 9052:1 (indicated by red arrow) in Mākua and Kahanahāiki valleys in 1912.

2.1.5 Historic Period Land Use

Historic Period land use within the ROI for MMR included ranching, agriculture, and U.S. military use, as described below.

2.1.5.1 Ranching and Agriculture

Aside from the LCA parcels, the remaining lands of Mākua and Kahanahāiki Ahupua'a became the property of the Hawaiian Government and the Kingdom. Consequently, most of the MMR lands were later converted to ranchland under a succession of government leases and fee-simple purchases of the LCA parcels. By 1864, most of Mākua and Kahanahāiki had been placed under a 25-year lease to Joseph and John Booth for cattle ranching. In 1873, the lease was transferred to Samuel Andrews, who lived at Mākua until about 1901 (Kelly and Quintal 1977:47). Andrews's ranch, named Makua Stock Ranch, was described as having 500 head of cattle and 5,000 acres of grazing land (McKenney 1884, in Kelly and Quintal 1977:

45). Andrews built his family house at Kahanahāiki on the land parcel originally awarded as LCA 9053 to Keolohua (Zulick and Cox 2001b:15). Andrew's clam is illustrated on an 1876 map of Oʻahu (Figure 11).

Ranch lands in Mākua transitioned to commercial sugar production at the turn of the 20th century. A portion of an 1899 map of Oʻahu (Figure 12) provides a glimpse of this land use: the Makua Sugar Company is illustrated in Mākua along with a church and school. Lincoln L. McCandless, an artesian well driller, took over the Mākua lease in the early 1900s. Except for a few years when it was leased to Frank Woods, the lands at Mākua and Kahanahāiki remained under control of McCandless Ranch until the U.S. military took over in 1942. Aside from sugar, the lower portions of Mākua Valley were favorable for growing cucumbers, watermelons, pumpkins, sweet potatoes, cotton, tobacco, and corn according to local informants (Kelly and Quintal 1977:18).

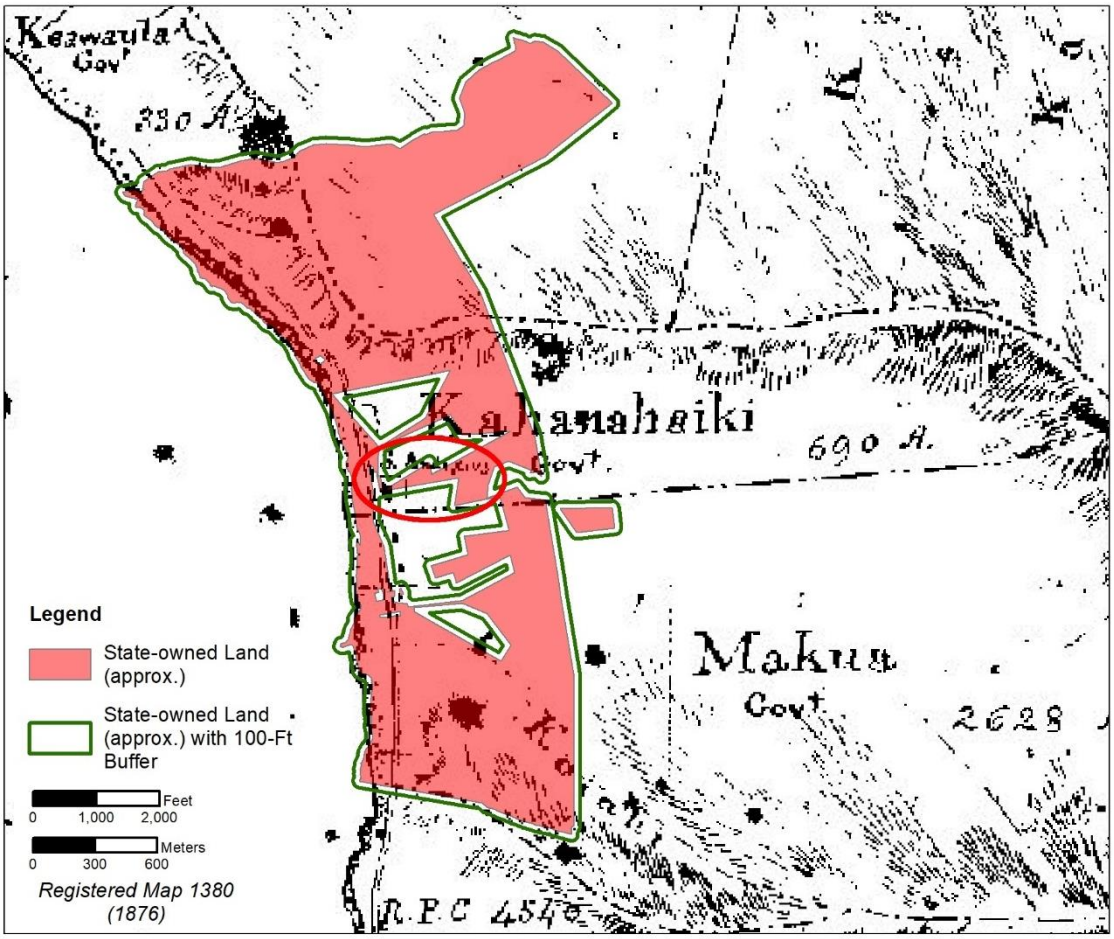


Figure 11. Portion of Hawai'i Registered Map 1380 (Lyons 1876) showing Samuel Andrews's homestead (circled in red) in 1876.

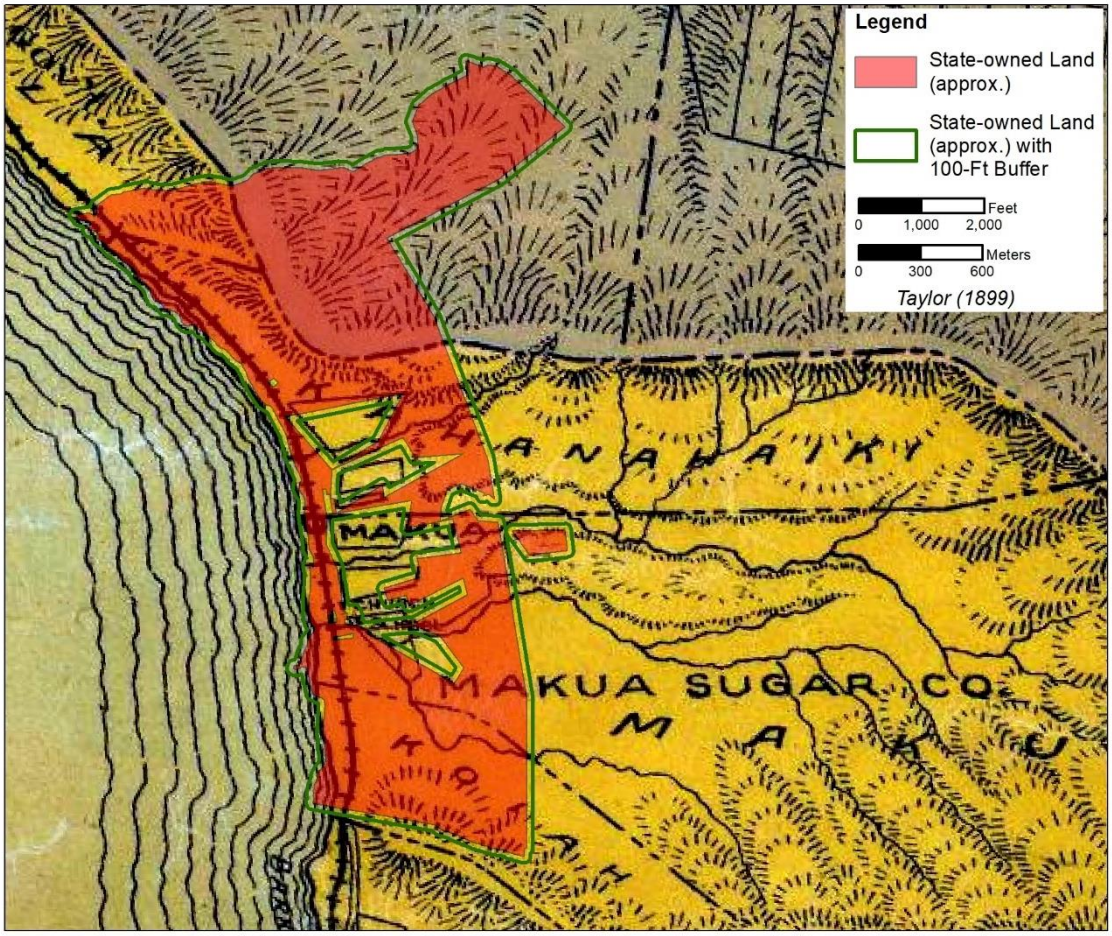


Figure 12. Portion of Taylor's (1899) map of Oʻahu depicting the Makua Sugar Company in Mākua Valley.

2.1.5.2 U.S. Military Land Use

The U.S. military began its presence in Mākua in 1929, when three parcels were granted to the U.S. Government by Territory of Hawaiʻi Governor Wallace Rider Farrington (these parcels were later returned to the Territory of Hawaiʻi). The parcels were used for the installation of defensive "Panama Mount" type gun emplacements (Zulick and Cox 2001b:20), which were installed in several strategic locations throughout Oʻahu in the decade before World War II. In 1932, the Army and Navy conducted an amphibious assault training exercise, "invading" the Waiʻanae Coast in small ships loaded with 640 personnel and 100 horses, along with wagons and other equipment. The landing at Mākua Beach was launched from a Naval ship following a simulated aircraft bombing (Zulick and Cox 2001b:21; Mann 1932) (Figure 13). The U.S. began conducting live fire and other training activities within MMR in 1942 when martial law was declared following the bombing of Pearl Harbor, with live-fire training activities ceasing in 2004. The State-owned land within the ROI has been leased since 1964.



Figure 13. Photo collage of the Army and Navy's amphibious assault training at Mākua in 1932, from Mann (1932:107).

2.2 KAHUKU TRAINING AREA (KTA)

This section provides the environmental and cultural-historical setting of the approximately 1,268-acre ROI for KTA within the Koʻolauloa District.

2.2.1 Environmental Context at KTA

The ROI for KTA is situated on the northwestern footslope of the Koʻolau Mountains (Tract A-3) and a level tableland formed by Waialeʻe Gulch behind the coastal flat (Tract A-1). Elevations within the ROI for KTA range from approximately 21 to 209 meters (70 to 685 feet) amsl in the northern (Tract A-1) parcel and from 155 to 417 meters (510 to 1,370 feet) amsl in the southern (Tract A-3) parcel. Annual rainfall within KTA area ranges from approximately 1,130 millimeters (44.5 inches) in the northern portion closest to the water to 1,600 millimeters (63 inches) in the tablelands behind the coastal plain (Giambelluca et al. 2013). Koleleiki and Paumalū streams flow northwest through the southern (Tract A-3) parcel and Waialeʻe Gulch carries water through the northern (Tract A-1) parcel before joining Pahipahiʻalua Stream near its outlet near Waialeʻe Beach Park, approximately 800 meters (0.5 mile) north of the ROI for KTA.

Vegetation at KTA has been heavily altered through historic ranching activities and pineapple and sugarcane cultivation and includes non-native grasses, drought-resistant trees, Polynesian introductions, and a few indigenous Hawaiian plant species. According to Sohmer and Gustafson (1987:145–154) and Anderson and Williams (1998:14), the lowlands and degraded slopes consist of the grasses *Miscanthus* sp. and *Gramineae* spp., as well as historically introduced tree species such as ironwood (*Casuarina equisetifolia*), kuawa (*Psidium guajava,* guava), kiawe, wilelaiki (*Schinus terebinthifolius,* Christmas berry), ʻalakapaika (*Pimenta dioica,* allspice), and koa haole. Kukui (*Aleurites moluccana,* candlenut) is a Polynesian introduction that persists in valley interiors. Indigenous Hawaiian plants previously identified in the uplands of KTA include hāpuʻu (*Cibotium menziesii, tree fern*) and ʻōhiʻa (*Metrosideros* sp.).

Soils mapped within the southern parcel (Tract A-3) of the ROI for KTA are comprised almost entirely of Kapaa silty clay (Figure 14). The soils within the northern parcel (Tract A-1) follow the drainages along the lower portions of Waialeʻe Gulch and are comprised almost entirely of silty clays of the Kemoo and Paumalu series (see Figure 14). Approximately 49 acres along the northern and eastern perimeters of this northern parcel are comprised of Stony steep and Rock lands, representing less than 4 percent of the ROI for KTA (see Figure 14).

2.2.2 Traditional Land Use

The windward region of Oʻahu was populated soon after the initial settlement of the Hawaiian archipelago around AD 600 (Kirch 1985:107). Hawaiian settlements eventually expanded from coastal environs into more marginal regions of Oʻahu (Williams and Patolo 1998:35; Patolo et al. 2010:5). The upland slopes of the ROI for KTA are marginal when compared with the resource-rich coastal strand below. One Traditional Hawaiian habitation site (SIHP Site 50-80-02-4887) is located within the ROI for KTA, comprised of a complex containing an enclosure, mounds, possible walls, and a platform situated between Kaunala Gulch and Waialeʻe Gulch. While no radiocarbon dates have been obtained from Site -4887, archaeological samples from excavations at SIHP Site 50-80-02-4884 (within KTA but outside the State-owned land) have produced calibrated dates ranging from AD 1490 to 1680 and from AD 1770 to 1800 (Williams and Patolo 1998:60).

Appendix B (Cultural Impact Assessment) of the EIS for ATLR on Oʻahu contains additional information on traditional land use at KTA (Craft et al. 2023).

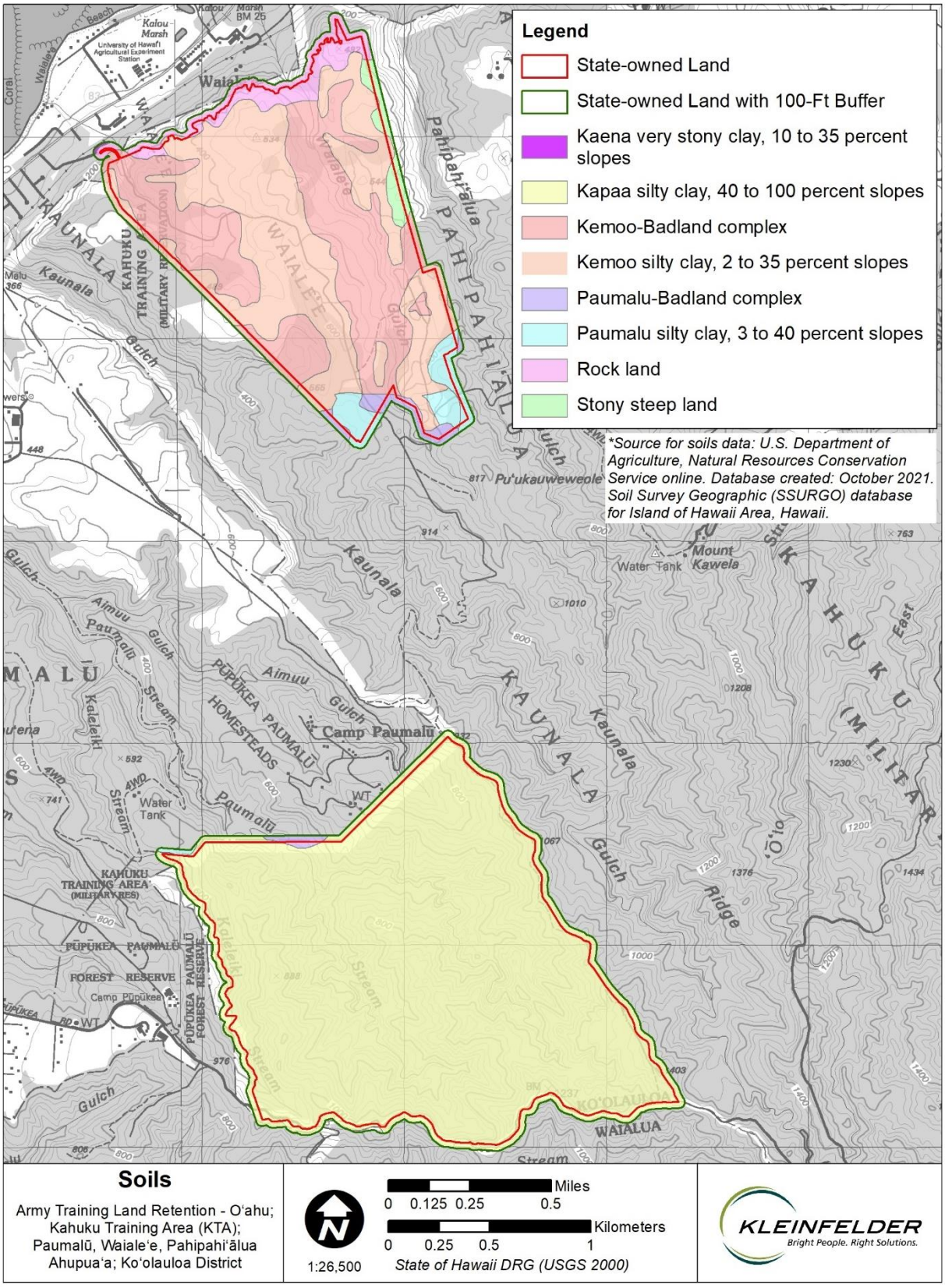


Figure 14. Soils mapped within the ROI for KTA.

2.2.3 Early Historic Period Accounts

Historical accounts of the Kahuku area are few, and often pose conflicting information concerning the socio-environmental conditions of the northern coast of Oʻahu. The earliest historical account of the area comes from Charles Clerke, who assumed command of the H.M.S. Resolution following the death of Captain Cook in 1779:

> Run round the Noern [northern] Extreme of the Isle [Oʻahu] which terminates in a low point rather projecting [Kahuku Point]; off it lay a ledge of rock extending a full Mile into the sea, many of them above the surface of the water; the country in this neighborhood is exceedingly fine and fertile; here a large Village, in the midst of it run up a large-Pyramid doubtlessly part of a Morai. [Beaglehole 1967:572, Part One, Vol III]

David Samwell, a surgeon on the H.M.S. Resolution expedition, describes the abundance of resources observed along the coastline at Waimea, several miles west of the ROI for KTA:

> The Island has a pleasant Appearance, having much wood upon it; the Land is in general high…the Island produces plenty of breadfruit, Cocoa nuts, Plantains, Yams, Taroo root & sweet potatoes & Sugar canes…there are many hogs upon it. [Beaglehole 1967:1221, Part Two, Vol III]

In contrast, Captain George Vancouver's observation of the area 15 years later describes a land that did not appear to be flourishing and lacked a sufficient population (Vancouver 1978, Vol 3:7). Yet, John Papa ʻIʻi describes the area as, "a delightful land, well provisioned" and noted, "[t]here was a pond there, surrounded by taro patches, and there were good fishing places inside the reef" (ʻIʻi 1983:24).

2.2.4 The Māhele ʻĀina and Land Tenure Change

See Section 2.1.4 for general information on the Māhele ʻĀina.

2.2.4.1 LCA and Kuleana Claims

One LCA was awarded within the ROI for KTA (Figure 15). This claim was awarded to William C. Lunalilo under LCA 8559B:37, which constituted a multi-parcel claim that included the entire 950-acre ahupuaʻa of Pahipahiʻālua. LCA records from this period indicate residential and agricultural activities had continued to center along the coast during the mid-19th century, rather than the upland plateau and slopes of the ROI for KTA.

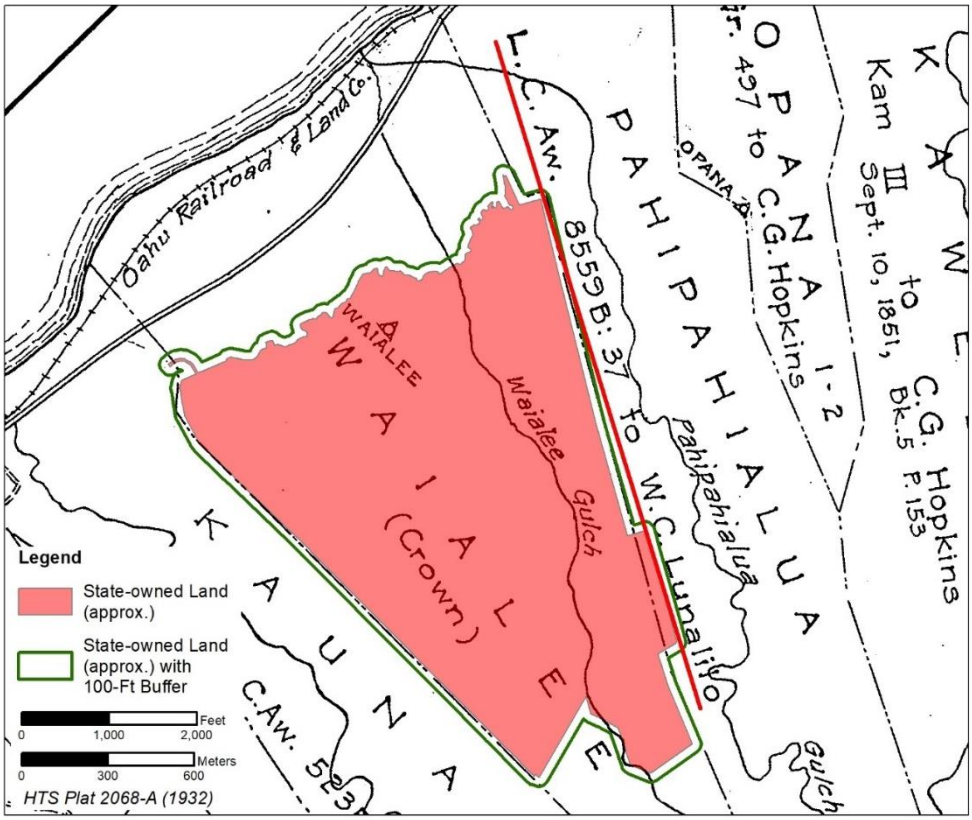


Figure 15. Portion of Hawai'i Territorial Survey Plat Map 2068A (King 1932) showing LCA 8559B:37 (underlined in red) which encompassed all of Pahipahi'ālua Ahupua'a, including a small section of the ROI for KTA.

2.2.5 Historic Period Land Use

Following the Māhele, foreign investors began acquiring large tracts of land on O'ahu for ranching, and later, agricultural development. Historic Period land use at KTA included commercial ranching, agriculture, and eventually U.S. military use.

2.2.5.1 Commercial Ranching and Agriculture

In 1852, Robert Moffitt founded the Kahuku Ranch where he raised cattle and sheep. Although Kahuku Ranch was located well outside of the ROI for KTA, near the present town of Kahuku, it is an important development for eventual land use within the ROI for KTA. Between 1867 and 1873, the Kahuku Ranch merged with another large ranch in the region, Malaekahana Ranch, and both were eventually sold in 1876 to James Campbell, a sugar planter from Lahaina, Maui (Williams and Patolo 1998:20). Campbell soon partnered with James Castle and Benjamin Dillingham to form the Kahuku Plantation Company, which was chartered in 1890 (Williams and Patolo 1998:21) and included rail lines and a mill facility that processed and transported sugarcane (Figure 16 and Figure 17). According to a 1902 map of O'ahu by Wall (1902), the plantation's facilities were located outside ROI, although Wall depicts cattle grazing and forest reserves occurring within the ROI (Wall 1902) (Figure 18).



Figure 16. Rail carts filled with sugarcane and smokestack in distance at Kahuku Plantation (Ramsay 1966).

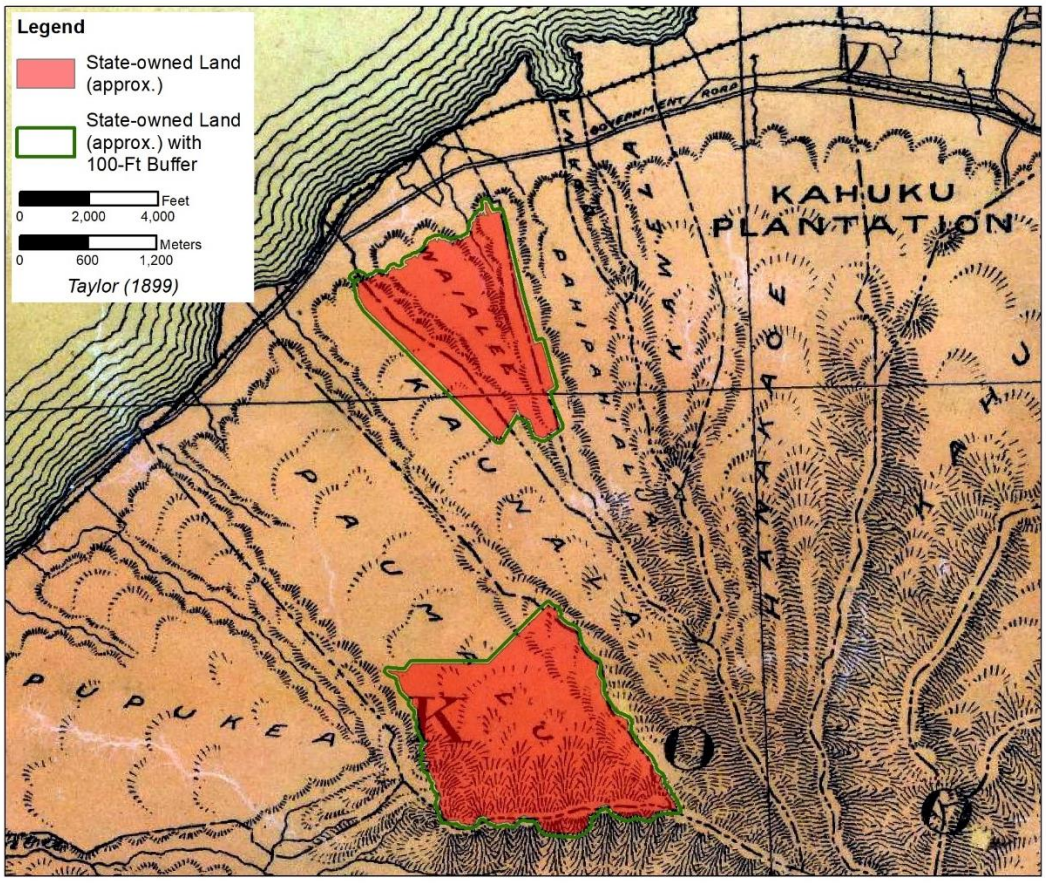


Figure 17. Portion of Taylor (1899) map of O'ahu showing the Kahuku Plantation in 1899.

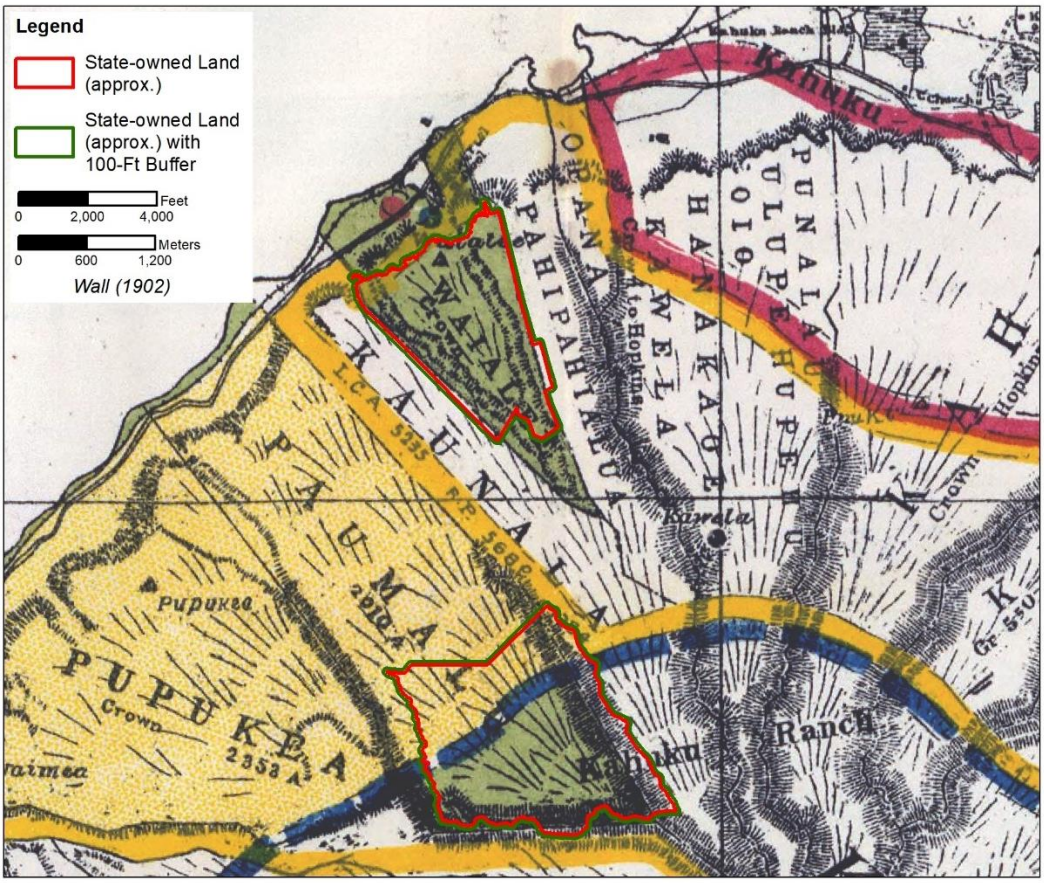


Figure 18. Portion of Wall's (1902) map of O'ahu depicting land use at the beginning of the 20th century; yellow outline denotes "Approximate Area of Grazing Lands", blue outline denotes "Forest Reserves", yellow areas denote "Homestead Settlement Tracts", and green areas denote "Public Lands".

2.2.5.2 U.S. Military Land Use

Early military endeavors in the KTA region, which began in 1931, were associated with coastal defense and the initiative to secure and fortify the coast around O'ahu. None of these activities, however, appear to have occurred within the ROI for KTA (Farrell and Cleghorn 1995:7; Bennett 2012:26). Following the Japanese air attack of Pearl Harbor on December 7, 1941, military defensive construction on O'ahu increased substantially. At this time, the largest wartime effort in the Kahuku Region was the construction of the Kahuku Airfield between 1941 and 1942, which lies outside of the ROI for KTA. The military remained active in KTA until late 1945; although, activities within the ROI for KTA are unclear.

In 1945, many of the military facilities at KTA were no longer necessary and were declared surplus (USACE-OCE 1945). While military activity may have abated, KTA continued to expand well into the 1950s. In 1956, KTA was expanded when an additional 3,700 acres was leased to the U.S. Government by the California

Packing Company and the James Campbell Estate (Nakamura 1981:14). KTA has since expanded to its current size of 9,480 acres.

2.2.5.3 Current Non-Military Land Use

An approximately 28-acre portion of the northern (Tract A-1) parcel of the ROI for KTA is currently used by the public for recreational off-highway vehicle activities at the Kahuku Motocross Park, which is permitted by the State of Hawaii's Department of Land and Natural Resources. Currently, public access is available on Saturdays, Sundays, and federal holidays. Recreational hiking, biking, and hunting are also practiced within the ROI for KTA.

2.3 KAWAILOA-POAMOHO TRAINING AREA (POAMOHO)

This section provides the environmental and historical background for the approximately 4,582-acre ROI for Poamoho within the Waialua District.

2.3.1 Environmental Context

The ROI for Poamoho, also designated as the 'Ewa Forest Reserve, is situated in the easternmost portion of Kamananui Ahupua'a within the Waialua District. Elevations within the ROI for Poamoho range from approximately 295 to 795 meters (970 to 2,600 feet) amsl, while annual rainfall varies from approximately 2,000 millimeters (79 inches) in the western portion to 5,000 millimeters (197 inches) in the eastern, Ko'olau portion (Giambelluca et al. 2013). Vegetation within Poamoho parcel varies greatly from riparian communities situated along the many drainages to sparse, hardy shrubs along exposed rocky ridges.

More than 97 percent (4,456 acres) of soils mapped within the ROI for Poamoho are classified as Rock and Rough mountainous lands (Figure 19). The remaining portion is comprised of clays and silty clays of the Paaloa and Helemano series. These are situated in the far western end of the parcel (see Figure 14) and represent the eastern extent of the dissected tablelands which slope northwest from Wahiawā towards the coast at Hale'iwa.

2.3.2 Traditional Land Use

The ROI for Poamoho is comprised of rugged, steep topography in the remote interior of O'ahu and is heavily vegetated, receiving some of the highest levels of rainfall on the island. Intensive Traditional Hawaiian activity in the region was likely low compared to coastal regions and flatter inland areas for these reasons; however, no cultural resource surveys have been conducted within the ROI for Poamoho to verify this statement.

Appendix B (Cultural Impact Assessment) of the EIS for ATLR on O'ahu contains additional information on traditional land use at Poamoho (Craft et al. 2023).

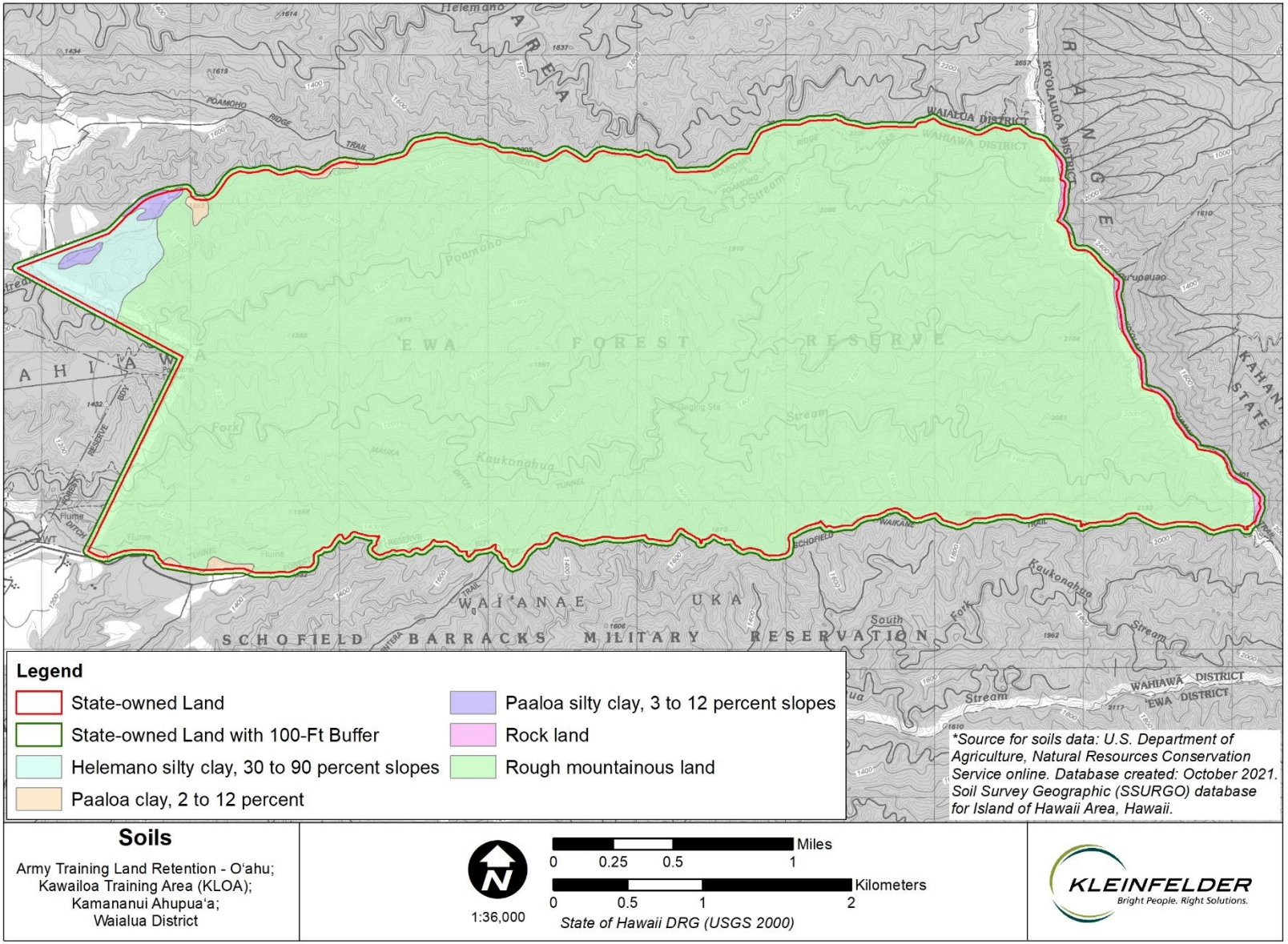


Figure 19. Soils mapped within the ROI for Poamoho.

2.3.3 Early Historic Period Accounts

There are no known early historic-period accounts that refer specifically to the ROI for Poamoho; most historical mentions of the general region of the central plain focus on Wahiawā, southwest of Poamoho.

2.3.4 The Māhele ʻĀina and Land Tenure Change

See Section 2.1.4 for general information on the Māhele ʻĀina.

2.3.4.1 LCA and Kuleana Claims

During the Māhele ʻĀina, Kamananui Ahupuaʻa, which included the Wahiawā area, was designated as Government Land. An 1899 map of Oʻahu depicts the ROI for Poamoho as "School Land" within Wahiawā (Figure 20). No LCAs were awarded within the ROI for Poamoho.

In 1852, Grant 973 was issued to James Robinson, Robert Lawrence, and Robert W. Holt, which consisted of 2,128 acres directly west of the ROI for Poamoho (see Figure 20). This land grant, and others throughout the central region of Oʻahu, were instrumental in the development of the commercial pineapple industry in the late 19th and early-20th centuries. Grant 973 was situated between the gulches of Poamoho and Kaukonahua, encompassing today's Whitmore Village and the Naval Computer and Telecommunications Area Master Station Pacific (NCTAMS PAC) facilities north of Wahiawā.

2.3.5 Historic Period Land Use

While the ROI for Poamoho has remained essentially undeveloped, the flat plains to the west were recognized shortly after Western contact as a valuable area for its natural resources and arable land.

2.3.5.1 Commercial Agriculture

Beginning in the early 20th century, pineapples were grown throughout the region to the west of the ROI for Poamoho, extending northwest along the Poamoho and Helemano stream gulches. The northwest corner of the ROI for Poamoho was altered by these agricultural activities but was limited due to the rugged topography and limited vehicular access (Figure 21; USAG-HI 2018).

2.3.5.2 U.S. Military Land Use

The ROI for Poamoho is part of the larger KLOA that was established as a troop maneuver and training area in 1955. Along with aviation training, mountain and jungle warfare training was conducted by small units within KLOA; although, under the current lease, only aerial training is permitted within the ROI for Poamoho (USAG-HI 2018:54). Today, the U.S. military conducts low-altitude helicopter aviation training within the ROI for Poamoho and maintains several helicopter landing zones in the northwest corner of the parcel.

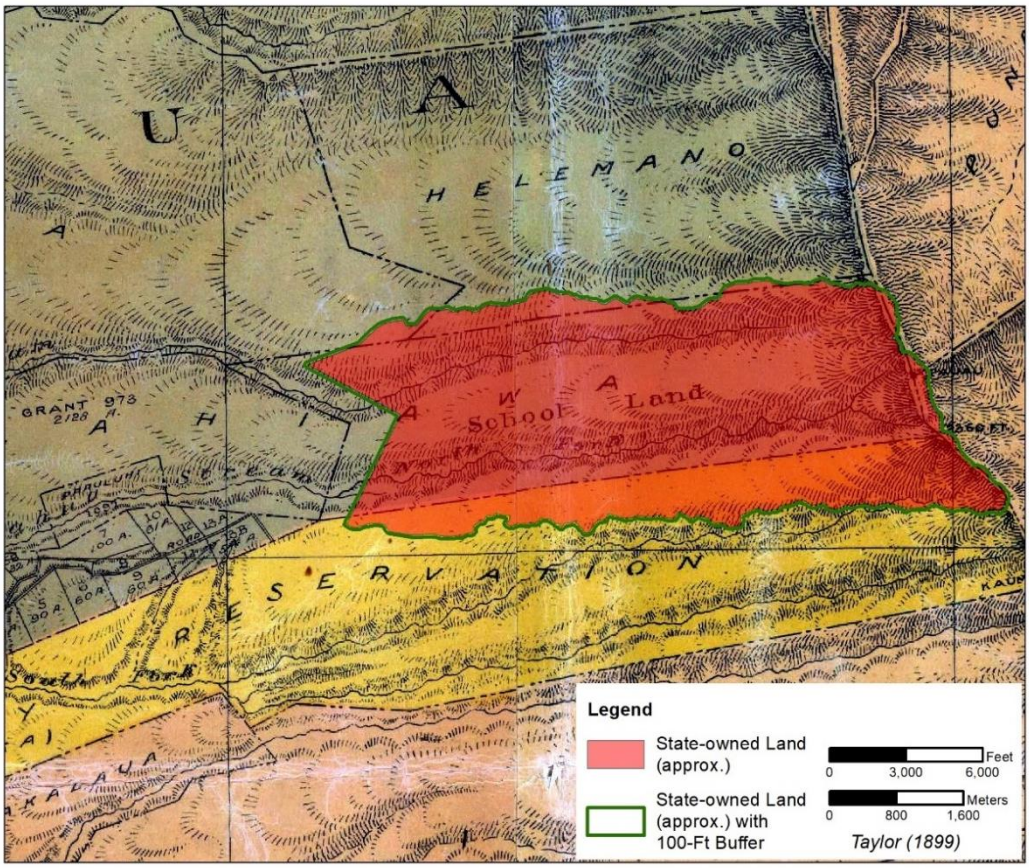


Figure 20. Portion of Taylor (1899) map of O'ahu depicting Grant 973 and the ROI for Poamoho as "School Land" within Wahiawa in 1899.

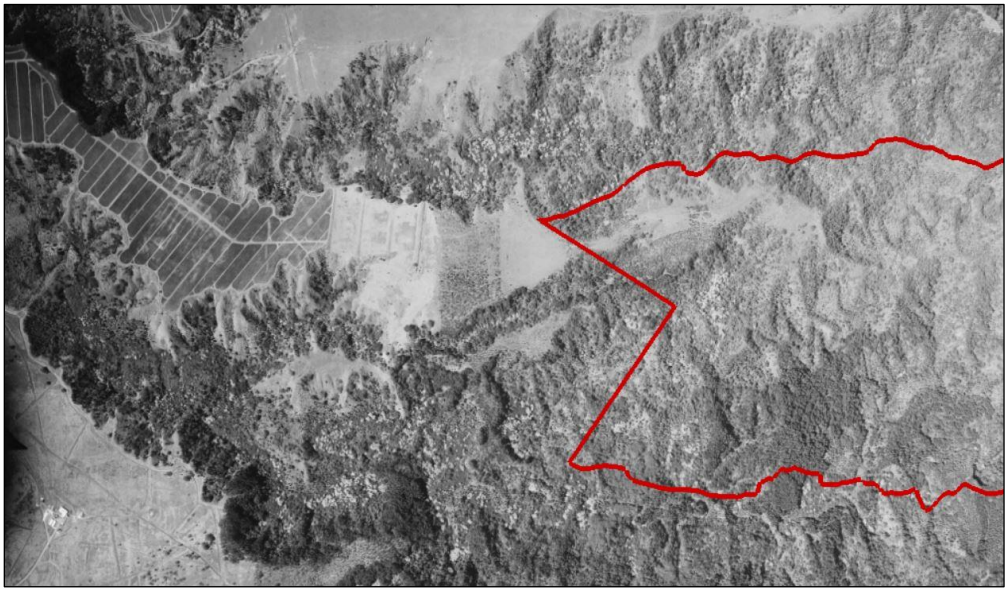


Figure 21. Western portion of State-owned land for Poamoho (outlined in red) depicted on USGS 1952 aerial showing pineapple fields to the west with historic agricultural land alteration extending into the northwest corner of the parcel.

3 ARCHAEOLOGICAL CONTEXT

This section provides a summary of previously conducted cultural resource studies and previously recorded historic and cultural resources within the individual ROIs for MMR, KTA, and Poamoho. Whenever possible, archaeological sites are referred to using the unique portion of the Hawaii State Inventory of Historic Places (SIHP) site numbers.

3.1 PREVIOUS CULTURAL RESOURCE STUDIES AT MMR

Cultural resource surveys of Mākua Valley began in the late 1970s. Of the approximately 982 acres that comprise the ROI for MMR, approximately 681 acres have been subjected to intensive identification efforts. The remaining 301 acres are unsurveyed or were subjected to reconnaissance studies that do not provide as thorough of an understanding of extant cultural resources due to the low intensity of the survey coverage. Activities that trigger a cultural resources study (e.g., a Section 106 undertaking) have not occurred as frequently in these unsurveyed portions of the ROI due to the nature of the steep terrain. Cultural resource investigations conducted within portions of the ROI for MMR include eleven studies that meet USAG-HI's current standards and are discussed below (Figure 22; Table 1).

In 1992, Biosystems Analysis, Inc. conducted an archaeological investigation (Eblé et al. 1995) of 477 acres in the southwestern portion of MMR that included portions of the ROI (see Figure 22). Twelve archaeological sites (SIHP Sites 50-80-03-4536 to -4547) were identified during the Eblé et al. (1995) study (see Table 3), including five (Sites -4541, -4543 to -4546) within or partially within the ROI for MMR. These sites contained Traditional Hawaiian stacked rock features (walls, terraces, enclosures, mounds, etc.), some containing subsurface thermal features, midden deposits, artifacts, and Historic Period components. Limited subsurface testing was conducted at Sites -4542, -4543, and -4544 (Sites -4543 and -4544 are within the ROI for MMR while Site -4542 is outside the ROI for MMR); analysis of radiocarbon samples from culturally enriched midden places these three sites within an overall adjusted date range of A.D. 1535–1950 (Eblé et al. 1995:11-2).

Ogden Environmental and Energy Services Co., Inc. conducted an archaeological investigation (Williams et al. 2001) involving archaeological monitoring of fenceline improvements in the southwestern portion of MMR in 1997 and subsequent surveys of approximately 100 acres in 1998, which also included subsurface testing at three sites (Sites -4543, -4544, and -4546) within or partially within the ROI for MMR (see Figure 22). Two new sites were identified during archaeological monitoring within the ROI for MMR, including SIHP Sites 50-80-03-5734 (L-shaped enclosure) and 50-80-03-5735 (lithic scatter).

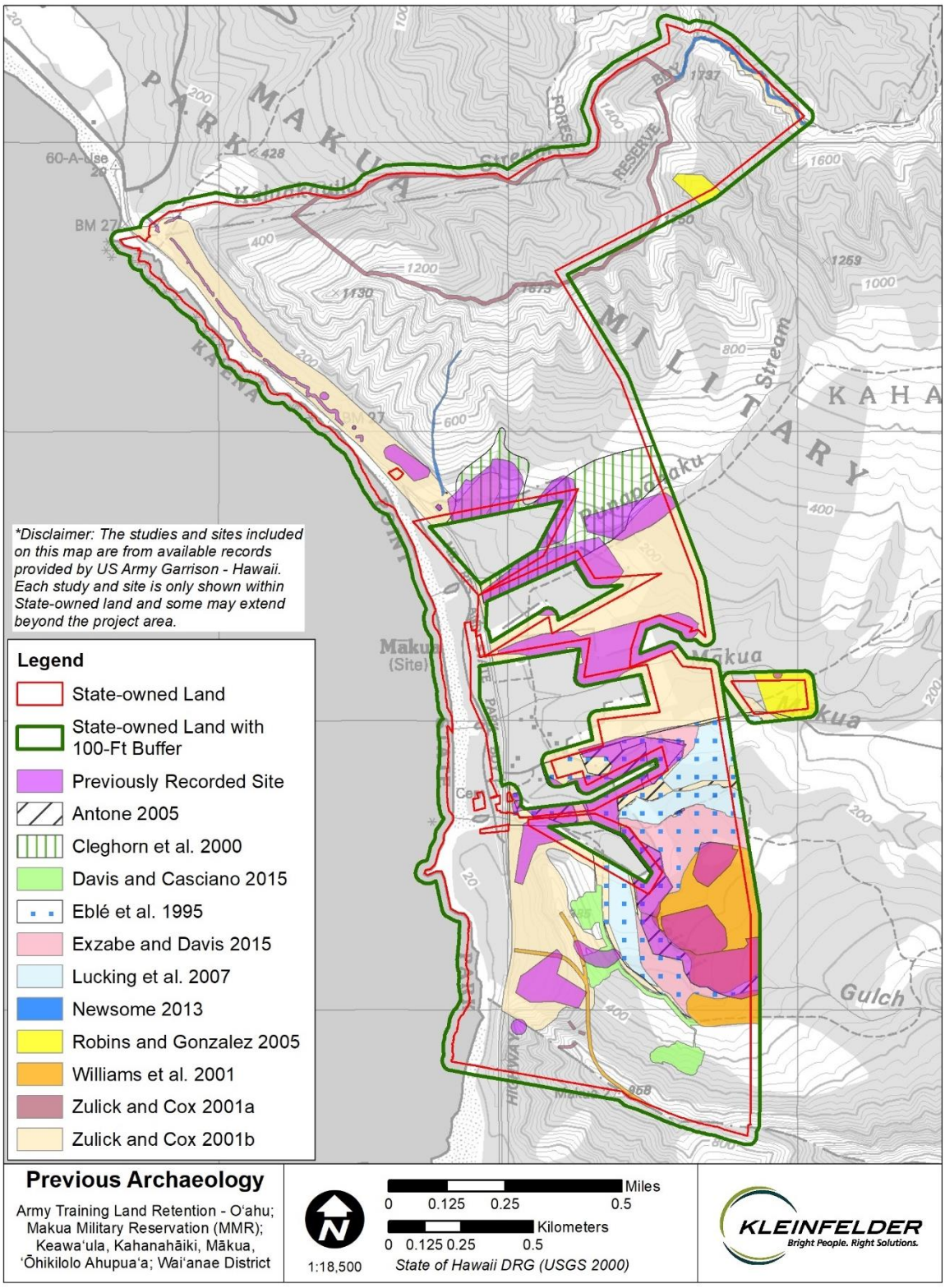


Figure 22. Previously conducted cultural resource studies and historic and cultural resources within the ROI for MMR.

*Table 1. Previous Cultural Resource Studies Conducted within the ROI for MMR**

TITLE	REFERENCE	STUDY TYPE	SUMMARY OF FINDINGS
Archaeological Investigations at Proposed MK-19 Range, Makua Military Reservation, Hawaiian Islands Waiʻanae District, Oʻahu, Hawaiʻi	Eblé et al. 1995	Reconnaissance survey with limited subsurface testing	Twelve sites (Sites -4536 to -4547) investigated, five (Sites -4541 and -4543 to -4546) within the ROI. Sites -4542 to -4544 subjected to subsurface testing.
Historic Preservation Studies and Investigations for Firebreak Road Improvements at the U.S. Army Makua Military Reservation, Oʻahu Island, Hawaiʻi	Williams et al. 2001	Intensive and reconnaissance level surveys with subsurface testing and archaeological monitoring	Three new sites identified (Sites -5734, -5735, and -5595), two (Sites -5734 and -5735) within the ROI. New features identified at six previously recorded sites (Sites -4542 to -4547), four sites (Sites -4543 to -4546) within the ROI. Sites -4543, -4544, and -4546 subjected to subsurface testing.
Archaeological Reconnaissance Survey of Proposed Fencelines within Makua Military Reservation, (MMR), Oahu Island, Hawaii	Zulick and Cox 2001a	Reconnaissance survey	No sites identified.
Phase I Inventory Survey of Cultural Resources on Makua Military Reservation, Island of Oʻahu, Hawaiʻi	Zulick and Cox 2001b	Reconnaissance survey	Thirteen new sites (Sites -5920 to -5932) identified. Six (Sites -5925 to -5927 and -5930 to -5932) within the ROI. New features identified at three sites (Sites -4538, -4542, and -4544), one (Site -4544) within the ROI.
Final Report Initial Implementing Activities for the Historic Preservation Plan at Ukanipō Heiau and Intensive Survey and Mapping of Archaeological Sites, Ukanipō Heiau Vicinity, Mākua Military Reservation, Mākua Valley, Oahu Island.	Cleghorn et al. 2002	Reconnaissance survey and site mapping	Five sites (Sites -0181 and -5775 to -5778) documented. Four sites (Sites -0181 and -5775 to -5777) within the ROI.
End of Fieldwork, August 2005, Burn Area at Makua Military Reservation (MMR) Waiʻanae District, Oʻahu Island	Antone 2005	Reconnaissance survey	Two new sites (DPW-033 and Site 2) identified, one (DPW-033) within the ROI. New features identified within three sites (Sites -4542, -4543, and -4546), two sites (Sites -4543 and -4546) within the ROI.

Table 1. (cont.)

TITLE	REFERENCE	STUDY TYPE	SUMMARY OF FINDINGS
Final Archaeological Survey and Protection of Cultural Resources During UXO Clearance Activities, Makua Military Reservation, Kahanahāiki and Makua Ahupuaʻa, Waiʻanae District, Island of Oʻahu, Hawaiʻi (TMK 8-2-01)	Robins and Gonzalez 2005	Reconnaissance survey and monitoring.	Fifty-nine sites identified (Sites -6499 to -6514, -6525 to -6528, and -6593 to -6631), one (Site 6527) within the ROI.
Archaeological Subsurface Survey Within the Company Combined Arms Assault Course (CCAAC) Circumscribed by the South Firebreak Road, Makua Military Reservation, Mākua Ahupuaʻa, Waiʻanae District, Oʻahu Island, Hawaiʻi (TMK 8-2-01:020)	Lucking et al. 2007	Subsurface testing	Confirmed that upper soil horizons had been completely removed during MMR construction activities. Three new sites identified (no descriptions or designations given).
Archaeological Pedestrian Survey for a Proposed Ungulate Control Fence located on Kahanahaiki Ridge, Oʻahu, Hawaiʻi.	Newsome 2013	Reconnaissance survey	No findings.
Archaeological Survey Report for the Lower ʻŌhikilolo Management Unit Outplanting Project Area at Makua Military Reservation, Mākua Ahupuaʻa, Waiʻanae District, Oʻahu Island, Hawaiʻi.	Davis and Casciano 2015	Reconnaissance survey	New features (possible cairn and old road bed) not designated as sites.
Archaeological Subsurface Survey in Areas B Through F at Makua Military Reservation, Mākua Ahupuaʻa, Waiʻanae District, Oʻahu Island, Hawaiʻi	Exzabe and Davis 2015	Subsurface testing	New features possibly associated with two sites (Sites -4542 and -4545) identified outside the ROI. Isolated Traditional Hawaiian artifact collected from within a shovel test pit near Site -4546.

* Studies not approved for use by USAG-HI are not included.

In 2001, USAG-HI Cultural Resources staff conducted an archaeological investigation (Zulick and Cox 2001a) for the installation of three fence segments located on ʻŌhikilolo Ridge and an ungulate control exclosure extending from Kahanahaiki Ridge to Kaluakauila Stream (see Figure 22). Two features, not located within the ROI for MMR, were encountered during the survey, including a small rock mound and a C-shaped enclosure within the exclosure portion of that study's project area. The features were interpreted as being associated with recent hiking activity or military use of the area.

Between 1999 and 2001, USAG-HI conducted an extensive Phase I survey and revisited 20 previously identified sites at MMR (Table 2), investigating a total area of 771 acres (Zulick and Cox 2001b) (see Figure 22). Fifty-eight new features were identified at previously identified sites (Zulick and Cox 2001b:37); one of these sites, Site -4544, is located within the ROI for MMR, which contained two of these 58 features. Thirteen new sites were identified (SIHP Sites 50-80-03-5920 to -5932) during the survey, including seven (Sites -5925 to -5927 and -5929 to -5932) within or partially within the ROI for MMR. These sites included walls, mounds, terraces, modified outcrops, rock alignments, enclosures, and platforms, some associated with large agricultural complexes (Zulick and Cox 2001b:51–52). Site -5929 is a gun emplacement and Site -5932 is an old trail or early road segment located partially within the ROI for MMR.

In 1998, Ogden Environmental and Energy Services Co., Inc. conducted cultural resource surveys and detailed site mapping (Cleghorn et al. 2002) in the vicinity of Ukanipō Heiau following a large-scale range fire that burned the area (see Figure 22). Five archaeological site complexes, including four (SIHP Sites 50-80-03-0181 and 50-80-03-5775 to -5777) within or partially within the ROI for MMR, were documented during that study including Ukanipō Heiau (Site -0181) where 44 features were recorded (Cleghorn et al. 2002:17). Four large site complexes (Sites -5775 to -5778) to the southeast of Ukanipō Heiau were also recorded, although one of these sites (Site -5778) is not within the ROI for MMR.

USAG-HI Cultural Resources staff conducted an archaeological survey (Antone 2005) of recently burned areas at MMR following a range fire that occurred in August 2005 (see Figure 22). During the survey, 57 new features were added to Sites -4542, -4543, and -4546; however, Site -4542 is not located within the ROI for MMR, and Sites -4543 and -4546 are partially within the ROI for MMR. In addition, two new temporary site numbers (Sites 2 and 3), containing three new features, were assigned; one of these newly identified sites (Site 3) appears to correspond with the location of Site DPW-033, which is within the ROI for MMR, while Site 2 appears to be outside the ROI for MMR. No descriptions are given for any of the features recorded during the survey.

Table 2. Historic and Cultural Resources Revisited During the Zulick and Cox (2001b:37) Survey

SIHP NUMBER (50-80-03-)	DESCRIPTION	REFERENCE	SUMMARY OF FINDINGS
0181*	Ukanipō Heiau	Thrum 1906; Hommon 1980; Cleghorn et al. 2002	None.
4536	Rock-lined well and walls	Eblé et al. 1995	None.
4537	Mounds and walls	Eblé et al. 1995	None.
4538	Enclosure and C-shape	Eblé et al. 1995	One military feature (concrete gun emplacement) added to site.
4539	Retaining wall	Eblé et al. 1995	None.
4541*	Walls	Eblé et al. 1995	None.
4542	Agricultural and habitation complex	Eblé et al. 1995	Four new features (platform, ahu, and two retaining walls) added to site.
4543*	complex	Eblé et al. 1995	One new feature (modified boulder) added to site.
4544*	complex	Eblé et al. 1995	Two new features (mounds) added to site.
4545*	complex	Eblé et al. 1995	None.
4546*	Enclosure and platform	Eblé et al. 1995	None.
4547	complex	Eblé et al. 1995	None.
4630	complex	Carlson et al. 1996	None.
5456	Earth oven complex	Williams et al. 2001	None.
5595	Wall and enclosure	Williams et al. 2001	None.
5734*	Temporary shelter	Williams et al. 2001	None.
5735*	Lithic scatter	Williams et al. 2001	None.
9518	Trail	Rosendahl 1977	None.
9525*	Wall	Rosendahl 1977	None.
9533*	Platform	Rosendahl 1977	None.

* All or portions of site located within the ROI for MMR.

In 2002 and 2003, Robins and Gonzalez (2005) conducted reconnaissance level surveys and archaeological monitoring of UXO clearance activities at MMR; a small, roughly 20-acre portion of that study's 530-acre project area is located within the ROI for MMR (see Figure 22). Fifty-nine sites (SIHP Sites 50-80-03-6499

to -6514, -6525 to -6528, and -6593 to -6631) were identified during that study, including 54 Traditional Hawaiian sites (eight of which contained post-Contact or modern features) and five historic sites (Robins and Gonzalez 2005:18). One of the sites (Site -6527) is located outside of State-owned land but within the 100-foot buffer for the ROI. Robins and Gonzalez (2005:25, 59, 101, 140, 150, 175) noted bomb craters, bullet damage, and UXO at several Traditional Hawaiian and Historic Period sites located outside the ROI. One of these bomb craters, however, was recorded either within or directly adjacent to the ROI. The exact location of this bomb crater is unclear, but it was recorded "to the immediate west" of Feature 6 of Site 6513, located just east of the ROI (Robins and Gonzalez 2005:59). At Site -6619, a Traditional Hawaiian wall complex located approximately 220 meters east of the ROI for MMR, two features (Features 1 and 3) were damaged during in-place UXO detonations which were monitored by USAG-HI archaeologists (Robins and Gonzalez 2005:175; Antone and Exzabe 2004:10, 15). Despite the installation of protective measures (plywood and sandbags), the western portion of Feature 1 was "severely impacted by the detonation of a 100-lb bomb" (Robins and Gonzalez 2005:150) that "forced some of that wall to be toppled" (Antone and Exzabe 2004:15), while Feature 3 "was largely demolished by the blast [of a 500-pound bomb] despite the protective measure taken" (Antone and Exzabe 2004:15).

Between November 2005 and December 2006, USAG-HI Cultural Resources staff conducted subsurface archaeological testing (Lucking et al. 2007) within a portion of the Company Combined Arms Assault Course (CCAAC) (see Figure 22). The subsurface testing study was a requirement completed to "satisfy the instructions set forth in the Makua Settlement Agreement and Stipulated Order dated 2001, Mālama Mākua v. Rumsfeld, et al., (Civil No. 00-00813 SOM LEK)" (Lucking et al. 2007: Appendix A). While only two of the 550 shovel probes demonstrated a potential for yielding intact cultural deposits, three new archaeological site areas were identified within the "Area 2" portion of that project's study area, with several features in each area, although no descriptions or number designations for these sites/features are given. Detailed recordation, mapping, and GIS data collection was "planned to be undertaken in a separate project by Cultural Resources archaeologists" (Lucking et al. 2007:i). Two of these unnumbered sites are described by Davis and Casciano (2015:17–18) as "mounds, terraces" and the third site is described as "kiawe fence posts, wire fencing".

In 2013, USAG-HI Cultural Resources staff conducted a cultural resource study (Newsome 2013) for two segments of a proposed ungulate control fence on Kahanahaiki Ridge at MMR (see Figure 22); one of the fence segments is located within the ROI for MMR. No archaeological features were identified as a result of the survey (Newsome 2013:2).

In 2014, USAG-HI Cultural Resources staff conducted a cultural resource study (Davis and Casciano 2015) within the ROI for MMR in the Lower ʻŌhikilolo Management Unit (see Figure 22). Two features identified

during the survey, comprising a possible cairn (Figure 23) that "may have originated from traditional times up to the modern era, and possibly even naturally formed" and a "possible old road bed" were not designated with site numbers; the authors stated the features lacked integrity and did "not meet any of the criteria for evaluation" (Davis and Casciano 2015:21). Dimensions for the features are not given, although a scaled photo of the cairn was included in the report (Davis and Casciano 2015:23) (see Figure 23).

In 2013, USAG-HI Cultural Resources staff conducted subsurface archaeological testing (see Figure 22) in accordance with the June 20, 2012, ruling by Judge Susan Oki Mollway of the U.S. District Court of Hawaii in the case of *Malama Makua v. Gates* (Exzabe and Davis 2015:i). Approximately 36 acres of that study's 44-acre project area are located within the ROI for MMR. During that study, 83 of the planned 113 shovel test probes were excavated, and a previously unidentified surface feature likely associated with Site 4545 (located within the ROI for MMR) was identified (Exzabe and Davis 2015:i). Locational information of the new feature, comprised of a remnant shallow terrace, was collected but detailed recordation of the features did not take place (Exzabe and Davis 2015:30). One artifact, a basalt hammer stone (Figure 24), was collected from within a shovel test pit located outside the boundary of Site 4546 (within the ROI for MMR), at a depth of 20–30 centimeters below the surface, approximately 20 meters north of Site 4546 and within the ROI for MMR. The authors stated that the artifact was "considered an isolated find that may have been secondarily deposited in that location as a result of land modification attributed to previous ranching or military activities" (Exzabe and Davis 2015:43).



Figure 23. Possible cairn identified by Davis and Casciano (2015:23).



Figure 24. Hammer stone recovered from excavations in the vicinity of Site -4546, from Exzabe and Davis (2015:65).

3.1.1 Identified Historic and Cultural Resources Within the ROI for MMR

According to GIS data provided by USAG-HI, 24 historic and cultural resources are located within or partially within the surveyed portions of the ROI for MMR (Table 3; see Figure 22). Traditional Hawaiian sites (Sites 0177, 0181, 4543 to 4546, 5735, 5775 to 5777, 5925, and 5926) are comprised of extant features (walls, mounds, terraces, a lithic scatter and petroglyph, etc.) related to Traditional land use: habitation, agricultural, travel, and ceremonial activities, including possible burials. Several of these Traditional Hawaiian sites (e.g., Sites 4543 to 4545, 5775, 5776, 5925, and 5926) also include Historic Period components. A natural geologic feature with cultural significance, Kāneana (Mākua) Cave (Site 0177), and the National Register of Historic Places-listed Ukanipō Heiau Complex (Site 0181) are also situated within the ROI.

Several large habitation complexes (Sites 5775 to 5777), located in the vicinity of Ukanipō Heiau and partially within the ROI for MMR, are situated along the lower segments of Punapōhaku Stream and an unnamed drainage, comprised of more than 190 features within a 35-acre plus area (Cleghorn et al. 2002:33–61). Many of these surface features are constructed of stacked basalt boulders which form walls, enclosures (Figure 25), terraces, mounds, and platforms that would have been utilized as permanent and temporary dwellings and activity areas, agricultural plots, and ceremonial and possible burial areas. Agricultural features, including earthen terraces, mounds, and retaining walls, were likely used to cultivate dry-land, non-irrigated crops such as ʻuala (sweet potato), kō (sugarcane), and ipu (gourd).

Table 3. Historic and Cultural Resources Within the ROI for MMR

SITE NUMBER	DESCRIPTION	PERIOD
50-80-03-0177	Kāneana (Mākua) Cave.	Traditional Hawaiian
50-80-03-0181	Ukanipō Heiau Complex, with terraces, walls, mounds, alignments, enclosures, C-shapes, depression, paving, and platform.	Traditional Hawaiian
50-80-03-4541	Walls and enclosures.	Historic
50-80-03-4543	Koʻiahi Gulch Complex, with enclosures, walls, mounds, terraces, C-shapes, thermal feature, and pits.	Traditional Hawaiian and Historic
50-80-03-4544	Koʻiahi Gulch Complex, with enclosures, alignments, terraces, mounds, and petroglyphs.	Traditional Hawaiian and Historic
50-80-03-4545	Mounds and wall.	Traditional Hawaiian and Historic
50-80-03-4546	Koʻiahi Gulch Complex, with enclosures, walls, and mound with upright stone.	Traditional Hawaiian
50-80-03-5734	Enclosure.	Undetermined
50-80-03-5735	Lithic scatter.	Traditional Hawaiian
50-80-03-5775	Habitation/agricultural complex, with enclosures, terraces, walls, mounds, alignments, modified outcrops, C-shapes, isolated Traditional Hawaiian artifact, and human skeletal remains.	Traditional Hawaiian and Historic
50-80-03-5776	Walls, terraces, mounds, and enclosures.	Traditional Hawaiian and Historic
50-80-03-5777	Mound (possible shrine).	Traditional Hawaiian
50-80-03-5925	Enclosures, platform/shrine, well, walls, and terraces.	Traditional Hawaiian and Historic
50-80-03-5926	Walls, well, alignment, upright slabs, and petroglyph.	Traditional Hawaiian and Historic
50-80-03-5927	Walls, alignment, and enclosure.	Historic
50-80-03-5929	Military bunker, gun emplacement, platform, and associated military debris.	Historic
50-80-03-5930	Platforms.	Undetermined
50-80-03-5931	Wall.	Undetermined
50-80-03-5932	Trail or road.	Undetermined
50-80-03-6527*	C-shape.	Undetermined
50-80-03-9525	Wall.	Historic
50-80-03-9533	Terrace.	Historic
Building 100	Communications building.	Historic
DPW-033	Terrace remnant.	Undetermined

* Located outside of State-owned land but within the 100-foot buffer for the ROI.



Figure 25. C-shaped enclosure (Feature 94) at Site -5775, from Zulick and Cox (2001b:148).

Surface artifacts and ecofacts noted within MMR in association with Traditional Hawaiian site complexes include ground and flaked stone objects, waterworn pebbles (possible ʻiliʻili stones), marine shell and coral fragments, ʻulu maika, petroglyphs on boulders, and metal/shrapnel fragments. Archaeological excavations of subsurface midden deposits and thermal features (e.g., Sites 4543, 4344, and 4546) within the ROI for MMR have recovered faunal bone, marine shell, basalt and volcanic glass artifacts and lithic debitage, wood charcoal, and coral manuports (Williams et al. 2001:33–42). While several features within sites at MMR have been recorded as possible (unconfirmed) human burials (Cleghorn et al. 2002:35), disarticulated human remains were observed on the surface of one site (Site 5775, Feature 56, terrace), which is located within the ROI for MMR. These remains were preserved *in situ* after "the remains were covered with a piece of plain brown paper and left in place" (Cleghorn et al. 2002:43).

Historic Period cultural resources (Sites 4541, 5927, 9525, and 9533) within or partially within the ROI for MMR are associated with 19th and early-20th centuries ranching and agricultural activities and the delineation of property boundaries (e.g., LCA boundary walls), along with more recent historic military-associated training activities. Further, some historic features (i.e., long wall segments) were likely constructed from basalt boulders that were quarried from abandoned Traditional Hawaiian structures (Cleghorn et al. 2002:127).

Two more recently constructed Historic Period cultural resources are located within the ROI for MMR, including Site 5929, an early-20th century coastal gun emplacement and concrete bunker with an associated military debris scatter (Figure 26). Zulick and Cox (2001b:157) suggest Site 5929 may be considered as a contributing property in the Artillery District of Honolulu (SIHP Site 50-80-13-1382). The former "Makua Sub Cable Site" is a concrete communications building built in 1966 (Building 100), which served as the terminus for an undersea communications cable linking Johnson Atoll with U.S. Air Force facilities throughout Hawai'i (Cleghorn et al. 2002:125).

Additionally, historic and cultural resources with undetermined ages are present within or partially within the ROI for MMR (Sites 5734, 5930 to 5932, 6527, and DPW-033) that comprise an enclosure, a well, an alignment, walls, platforms, a trail, and a terrace remnant.



Figure 26. Military coastal gun emplacement (Feature 2) at Site -5929, from Zulick and Cox (2001b:158).

3.2 PREVIOUS CULTURAL RESOURCE STUDIES AT KTA

Cultural resource surveys in the ROI for KTA began in the early 1980s (Davis 1981). Of the approximately 1,268 acres that comprise the ROI for KTA, approximately 596 acres have been subjected to intensive cultural resource surveys. The remaining approximately 672 acres are unsurveyed or were previously subjected to studies at a reconnaissance level that do not meet the Army's current standards and so are not counted toward the current assessment. Two cultural resource surveys have been conducted that include portions of the ROI for KTA: Williams and Patolo (1998) and Patolo et al. (2010). The paragraphs below summarize these previous investigations (Figure 27; Table 4).

Williams and Patolo (1998) conducted a cultural resource investigation (see Figure 27) that included portions of both parcels that comprise the ROI for KTA. Fourteen cultural resources were recorded during that study, including Traditional Hawaiian and Historic Period archaeological sites, and sites and features of undetermined age. Of the 14 sites identified during the survey, two sites (SIHP Sites 50-80-02-4887 and -4888) are located within the ROI for KTA (see Section 3.2.1). Williams and Patolo (1998:64) recorded a Traditional Hawaiian residential site complex (Site -4887) on the Kaunala/Waiale'e Ridge in the northwestern portion of the northern (Tract A-1) parcel. The site complex consists of 11 features, including one enclosure, one C-shape, two circular alignments, one linear alignment, five terraces, and one depression (Williams and Patolo 1998:71). Site -4888 was recorded by Williams and Patolo (1998:73–74) as a series of earthen depressions, the largest containing charcoal and possibly representing an imu (earth oven), located on a knoll within Paumalū Stream in the southern parcel (Tract A-3) of the ROI for KTA. Other smaller depressions at Site -4888 were suspected to have resulted from agricultural activities. While radiocarbon dating was not conducted on sites within the ROI for KTA, subsurface testing of an imu at SIHP Site 50-80-02-4884, located approximately 1.3 kilometers (0.85 mile) to the east of the ROI for KTA, resulted in the collection of a charred tuber (*Ipomoea batatas*) and wood charcoal (*Acacia koa*). The samples were submitted for radiocarbon dating which produced calibrated date ranges of AD 1490 to 1680 and 1770 to 1800 (Williams and Patolo 1998:60).

Patolo et al. (2010) conducted an archaeological survey with limited subsurface testing (see Figure 27), that included portions of the northern parcel (Tract A-1) of the ROI for KTA. Thirty-two newly identified sites were recorded during that study, including 14 Historic Period sites (SIHP Sites 50-80-02-6969 to -6972 and -6975 to -6984) within the ROI for KTA (see Section 3.2.1), which are mainly comprised of military-associated features including mounds, foxholes, terraces, a concrete bunker, a gun emplacement, and a survey marker (Patolo et al. 2010:20–22). While the study did not conduct radiocarbon dating from sites within the ROI for KTA, calibrated dates ranging from 230 to 700 years before present were obtained from four other sites within KTA that were investigated during that study (Patolo et al. 2010:Appendix B).

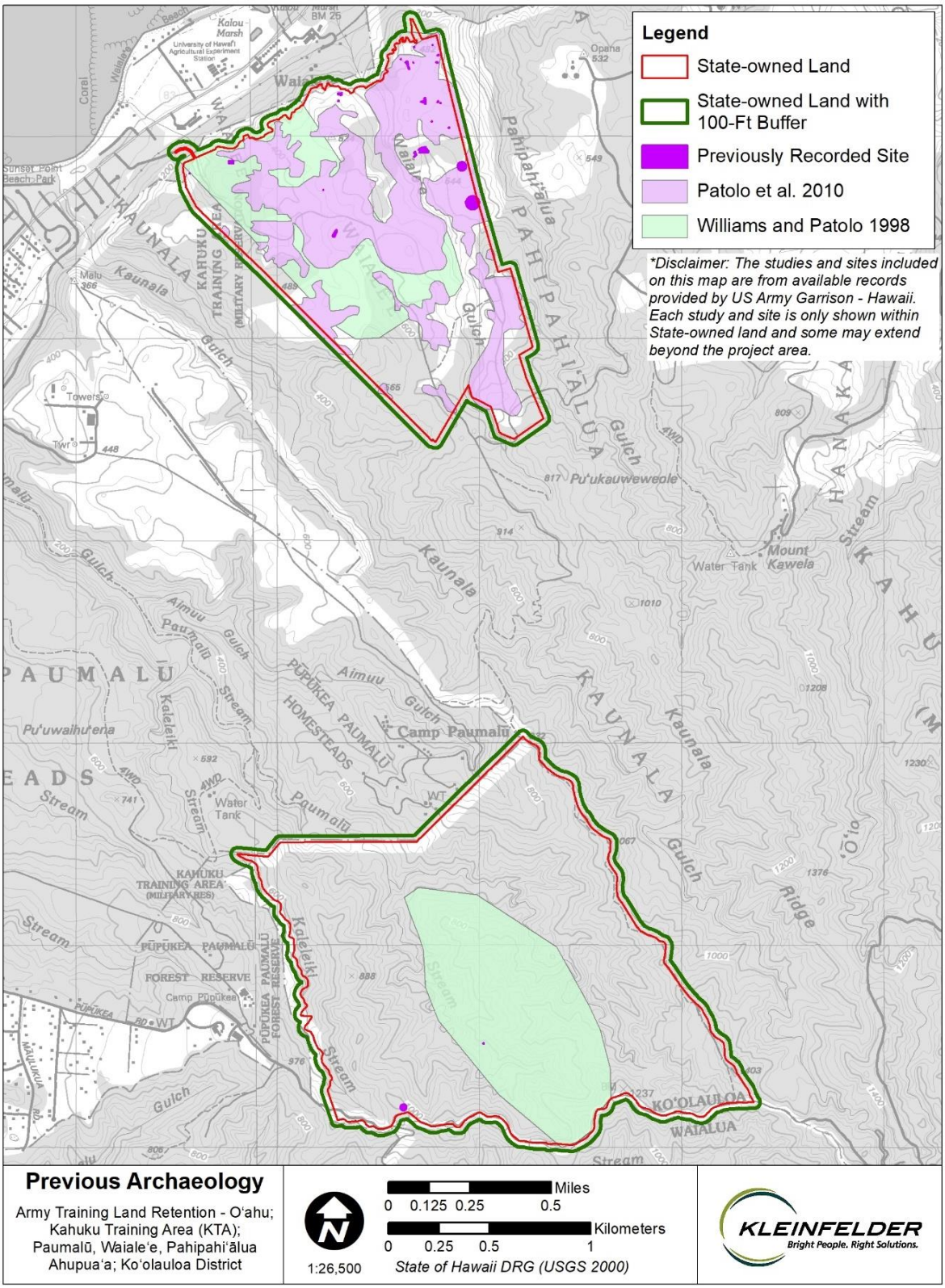


Figure 27. Previously conducted cultural resource studies and historic and cultural resources within the ROI for KTA.

*Table 4. Previous Cultural Resource Studies Conducted within the ROI for KTA**

TITLE	REFERENCE	STUDY TYPE	SUMMARY OF FINDINGS
Final Report Archaeological Inventory Survey of the Kahuku Training Area, for the Legacy Resource Management Program, Oʻahu Island, Hawaiʻi	Williams and Patolo 1998	Archaeological reconnaissance survey with subsurface testing	Fourteen new sites (Sites 4876 to 4888 and 4930) identified. Two (Sites 4887 and 4888) within the current study area.
Phase I Archaeological Survey with Limited Subsurface Testing in Support of Designated "GO" Areas for Stryker Manuever in the U.S. Army Kahuku Training Area, Ahupuaʻa of Waimea, Pupukea, Kaunala, Waialeʻe, Pahipahiʻalua, ʻOpana, Kawela, Hanakaoe, ʻOʻio, ʻUlupehupehu, Paumalu, Kahuku, Keana, Malekahana, Laʻie, and Kaipapaʻu, Koʻolauloa District, Island of Oʻahu, Hawaiʻi [TMK (1) 5-6, 5-7, 5-8 and 5-9: Various]	Patolo et al. 2010	Archaeological reconnaissance survey with subsurface testing	Thirty-two new sites (Sites 4599, 6537, 6969 to 6984, 6993, 6994, 6998, 7015 to 7019, 7022, 7023, 7026, 7028, and 7029) identified. 14 (Sites 6969 to 6972 and 6975 to 6984) within the current study area.

*Studies not approved for use by USAG-HI are not included.

3.2.1 Identified Historic and Cultural Resources Within the ROI for KTA

According to GIS data provided by USAG-HI, 22 historic and cultural resources are located within or partially within the surveyed portions of the ROI for KTA (Table 5; see Figure 27). These sites include one Traditional Hawaiian habitation complex (Site -4887) and 20 historic-period/modern sites, and one site of undetermined period, mainly composed of military-associated features, including mounds, foxholes, and terraces, along with a bunker, a gun emplacement, and a survey marker.

One Traditional Hawaiian habitation site (Site 4887) is located within the ROI for KTA, although others are recorded within the larger KTA. The surface features (n=11) at Site 4887 are constructed of stacked basalt boulders which form terraces and alignments, along with an enclosure and a C-shape, that would have been used as dwellings, activity areas, and possibly an animal pen; an earthen depression interpreted as a possible imu was also recorded (Williams and Patolo 1998:72–73). Site 4888 contains possible agricultural features including earthen depressions, a boulder alignment, and another possible imu; the site area was noted to be impacted by extensive erosion and weathering (Williams and Patolo 1998:74). Isolated Traditional Hawaiian artifacts have also been documented within the ROI during the recording of Historic Period sites, including a basalt adze fragment near Site 6972 and a basalt flake at Site 6981 (Patolo et al. 2010:138).

Table 5. Historic and Cultural Resources within the ROI for KTA

SITE NUMBER	DESCRIPTION	PERIOD
50-80-02-4887	Habitation complex with enclosure, mounds, possible walls, and platform.	Traditional Hawaiian
50-80-02-4888	Depressions.	Undetermined
50-80-02-5689	Underground bunker.	Historic
50-80-02-6440	Concrete pit.	Historic
50-80-02-6676	Foxholes and blinds.	Historic/Modern
50-80-02-6677*	Mounds and alignments.	Historic
50-80-02-6969	Terrace and gun emplacement.	Historic/Modern
50-80-02-6970	Foxholes and military debris.	Historic/Modern
50-80-02-6971	Rock concentration, mounds, and military debris.	Historic/Modern
50-80-02-6972	Terrace and mounds.	Historic/Modern
50-80-02-6975	Mounds and military debris.	Historic/Modern
50-80-02-6976	Enclosure.	Historic/Modern
50-80-02-6977	Platform, terrace, enclosure, foxhole, and military debris.	Historic/Modern
50-80-02-6978	Terrace.	Historic
50-80-02-6979	Terrace, walls, mounds, foxholes, and military debris.	Historic
50-80-02-6980	Terrace.	Historic
50-80-02-6981	Mound and isolated basalt flake.	Historic
50-80-02-6982	Rock concentration and alignment.	Historic
50-80-02-6983	Rock lined foxhole.	Historic/Modern
50-80-02-6984	Wall, modified outcrop, mound, and C-shape.	Historic/Modern
SCS-KTA-TS-74	Mounds, modified outcrop, fence posts, and military debris.	Historic
SCS-KTA-TS-142	Survey marker, pit feature, and military debris.	Historic

* Partially located within State-owned land.

Historic archaeological sites (Sites 5689, 6440, 6676, 6677, 6969 to 6972, 6975 to 6984; and SCS-KTA-TS-74 and 142) within the ROI for KTA are largely associated with pre-World War II and later military use of the area. These sites are generally comprised of hastily constructed stacked rock and pit features (e.g., mounds, foxholes, and terraces) associated with training activities, along with more formal defensive positions and gun emplacements constructed with concrete elements (Patolo et al. 2010:20–22). None of

the historic resources located on ROI for KTA have been subjected to evaluations of eligibility for the NRHP.

3.3 PREVIOUS CULTURAL RESOURCE STUDIES AND RESOURCES AT POAMOHO

Due to its rugged environment and the low occurrence of non-aviation training activities (and resulting lack of compliance needs), no cultural resource investigations have been conducted within the ROI for Poamoho, and to date, no historic or cultural resources have been identified.

4 RECORDED IMPACTS ON HISTORIC AND CULTURAL RESOURCES

Previous cultural resources studies have recorded various impacts on the general landscape within the State-owned lands at MMR and KTA, which include impacts from the past. Additionally, 5,248 acres of the total 6,322 acres of the State-owned lands have not been surveyed; thus, the presence of historic and cultural resources as well as previous impacts to those resources are unknown for these areas. Analysis of past and current impacts can be found within Section 3.4.5 of the O'ahu ATLR EIS.

4.1 PAST IMPACTS WITHIN THE ROI FOR MMR

Past impacts on historic and cultural resources within the ROI for MMR are presented below.

Adverse impacts on historic and cultural resources associated with past military activities within the State-owned land at MMR are largely associated with physical impacts from live-fire training (which ceased in 2004) and other military actions, such as road construction, firefighting, and removal and/or detonation of UXO. Adverse impacts from past actions are recorded at five sites within the State-owned land, as described below.

Cleghorn et al. (2002:33–45) describes physical impacts from military actions at Site -5775, a multi-component site comprising 73 individual features. Zulick and Cox [2001b:124–151] subsequently documented 50 additional features at the site associated with Traditional Hawaiian and historical habitation, agricultural, and possible interment activities. According to the authors, the site, "has been impacted from U.S. military training activities (i.e., live fire and ground maneuvers), and maintenance of the military range, such as road building and firefighting. These impacts are evidenced by bulldozer, or tank, tracks through the center of the site, numerous pits and rock shatter from detonations of munitions, and bulldozed gaps in the site's walls" (Cleghorn et al. 2002:33). Zulick and Cox (2001b:128,132) documented a 60-meter-long break in Feature 74 (wall) due to bulldozer disturbance (Feature 74 was recorded as part of Site -5775 but is actually within the current site boundary of Site -5777 and situated wholly within the ROI). Similar bulldozer damage was recorded at Feature 90, located partially within the ROI (Zulick and Cox 2001b:140).

Cleghorn et al. (2002:45) also detailed impacts "by live fire activities associated with U.S. military use of the Mākua Range" at Site -5776, a large multi-component site comprised of Traditional Hawaiian habitation features, possible burial markers, drainage barriers, historic cattle walls, and a possible historic road. This site, comprising 116 features, is located partially in State-owned land (the remaining, and larger, extent of the site is in Army-owned land). Cleghorn et al. (2002:45) note occurrences of impact craters within the site area as well as exploded and unexploded ordnance.

Zulick and Cox (2001b:61) recorded adverse physical impacts from small arms on Feature 2 at Site -4546, a probable historic animal exclusion wall. The authors noted, "boulders of the wall show considerable bullet damage to their surfaces." Site -4546 is located partially within the ROI, and Feature 2 is situated outside the ROI.

Military construction of roadways within State-owned land have also resulted in adverse impacts on historic and cultural resources. Cleghorn et al. (2002:43) noted Feature 56 at Site -5775, the multi-component site mentioned above, as having been partially destroyed by construction of a bulldozed road on the north side of the feature. Boulder rubble and disarticulated human skeletal remains were also noted near and on the surface of the feature's rock terrace. Eblé et al. (1995:7-22) and Zulick and Cox (2001b:36) reported impacts on another site: Site -4541, a complex of rock walls likely representing the historic property boundary for LCA 9901:1, which straddles both State-owned and Army-owned land. Physical destruction was noted at Feature 2, situated along the boundary of the ROI, involving "a ten-meter long cut or break in the middle of the wall…made during construction of the cross-valley 'flash pan' road" (Zulick and Cox (2001b:36).

In addition to specific impacts from live-fire training and road construction, general adverse impacts from past land use are recorded at the Ukanipō Heiau Complex (Site -0181). These impacts include human induced actions, such as ranching, military training, wildfires caused by military training, and site visitations, in addition to naturally induced factors, including invasive vegetation, erosion, and feral animals, all of which are often associated with human actions (Cleghorn et al. 2002:61-62, Appendix F). Cleghorn et al. (2002:125) further suggested that the construction of Building 100 in 1966 in the vicinity of Ukanipō Heiau diminished the heiau's integrity by introducing visual impacts that affect the setting, feeling, and association of the Traditional Hawaiian ceremonial site.

Impacts from fires can paradoxically be both adverse and beneficial. Adverse physical impacts from an uncontrolled fire in the late 1990s were posited to include "thermal alteration of rock features, such as spalling; vegetation changes, including denuding of ground cover which may accelerate erosion and collapse of features; and introduction of charcoal…which may…contaminate culturally introduced radiocarbon samples important to site dating" (Eidsness and Cleghorn 2000:24–26, in Cleghorn et al. 2002:125). Conversely, beneficial impacts from fires associated with live-fire training and associated controlled burns to facilitate UXO identification have, in some cases, facilitated access to previously heavily vegetated cultural resources (Cleghorn 2002:62; Antone 2005) as well as made it easier and safer to remove UXO to permit safe access for cultural resource investigations and cultural practitioners (USAEC and USACE 2009:3-9, 3-51). Antone (2005) conducted a survey within a roughly 280-acre area that was burned following the ignition of a White Phosphorus round that had heated up and spontaneously ignited

(Kawelo 2005). Approximately 46 acres of the surveyed area included portions of the ROI for MMR, where new features were identified at several sites, and two new sites were recorded (see Section 3.1). Additionally, an 800-acre wildfire caused by a misfired mortar in 1998 was the impetus for providing access for much of the archaeological work conducted at Ukanipō Heiau (Eidsness and Cleghorn 2000; Cleghorn et al. 2002).

Extensive impacts associated with past landscape modification are recorded within the ROI for MMR. Subsurface investigations conducted by Lucking et al. (2007) and Exzabe and Davis (2015) demonstrated that the upper A and B soil horizons had been completely removed from areas within training objectives in the CCAAC, which extends into the eastern portion of the ROI (Lucking et al. 2007:33, Exzabe and Davis 2015:i). Both studies yielded no extant historic or cultural resources due to these large-scale disturbances. Only two of the 550 test excavations undertaken during the Lucking et al. (2007:i) study, for example, provided archaeological material, while all 83 shovel test probes excavated during the Exzabe and Davis (2015) study produced no evidence of subsurface archaeological features or intact cultural deposits (Exzabe and Davis 2015:i). These large-scale soil disturbances were determined to be related to "extensive and widespread bulldozing during range construction" (Lucking et al. 2007:6), and it cannot be determined if the extant sites directly adjacent to these studies' project areas (e.g. Sites 4541, 4543, 4544, 4545, 4546, 5926, 9525, and DPW-033) were impacted, or if unrecorded sites or features related to existing sites where the soil columns were truncated had been destroyed.

No other impacts from past activities are recorded for specific cultural resources within State-owned land.

4.2 PAST IMPACTS WITHIN THE ROI FOR KTA

Past impacts to historic and cultural resources within the ROI for KTA are presented below.

Adverse impacts from past activities at KTA are documented in two cultural resource studies. Patolo et al. (2010:13) and Williams and Patolo (1998:78) noted historical land alterations throughout their survey areas, both of which overlap portions of the ROI. These land alterations, observed particularly in the lower elevations of the broader KTA area, which may include portions of the ROI, indicated to the authors of those studies that large areas may have been graded in the late nineteenth and early twentieth centuries for commercial ranching or possibly industrial sugar cane cultivation. Many of these graded areas were later used during subsequent military activities. It is unclear, however, if the impacts mentioned by these two studies occurred within the ROI. While ranching did occur in the ROI (see Section 2.2.5), it is unclear if it resulted in large-scale grading. It seems likely that extensive grading is more characteristic of the eastern portions of KTA, outside the State-owned land, since sugar cane plantations, requiring relatively level fields, are known to have occurred outside the ROI (see Section 2.2.5.1). Erosion and exposure of badland complexes (dissected landscapes with sparse soil cover and vegetation) is more widely extant

than prior grading within the ROI and may have resulted in impacts over time to the preservation of subsurface historic and cultural resources. The construction of military- and motocross access roads throughout KTA, which traverse onto the State-owned land, would have had the potential to impact historic and cultural resources as well, but no impacts on specific resources related to these activities are known.

These general landscape alterations may have broadly impacted the preservation of historic and cultural resources over time. The only adverse impact recorded for a specific historic/cultural resource within the State-owned land is attributed to historical land modification on a terrace and mound complex (Site 6972) associated with historic military construction (Patolo et al. 2010:30-31,144). Each feature of this site, however, was assessed to be in fair to good condition, suggesting that impacts were minor to negligible (Patolo et al. 2010:30).

No other impacts from past activities are recorded within the previous cultural resource studies approved for use by USAG-HI for specific cultural resources within the ROI for KTA.

In addition to adverse impacts, no significant beneficial impacts from past activities are known to have occurred within State-owned land.

4.3 PAST IMPACTS WITHIN THE ROI FOR POAMOHO

No cultural resource investigations have been conducted within the ROI for Poamoho, and to date, no historic or cultural resources have been identified. Past impacts to historic and cultural resources, if present within the ROI for Poamoho, are unknown.

5 SUMMARY AND CONCLUSION

This document presented a literature review of previous cultural resource studies and recorded historic and cultural resources to support the preparation of an EIS that analyzes the environmental effects of a Proposed Action for the O‘ahu ATLR EIS project at MMR, KTA, and Poamoho. The current document is meant to support the NEPA review process by compiling background information on existing conditions of historic and cultural resources known to exist within the ROI. This literature review will be used to generate an understanding of the current conditions and recorded impacts to historic and cultural resources within the ROI, which facilitate the analysis of environmental consequences provided in the EIS. The results of this analysis help to generate a preliminary assessment of the project’s potential impacts on historic and cultural resources as well as recommendations for managing the impacts of the Proposed Action. This document will be appended to the EIS as a contributing technical study.

Forty-six (46) historic and cultural resources are recorded within or partially within the ROI, comprising a range of Traditional Hawaiian and Historic Period archaeological sites, structures, and features. To date, approximately 19 percent (1,277 acres) of the ROI has been subjected to archeological inventory survey, consisting of 13 separate investigations. Although other cultural resource projects have been conducted within the ROI, these 13 studies meet USAG-HI’s standards for archaeological investigations, and so are counted as surveyed and inventoried land. Approximately 81 percent (5,556 acres) of the ROI has either remained unsurveyed or was subjected to studies that do not meet the USAG-HI’s current standards.

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Appendix J

Regulatory Framework

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Appendix J

REGULATORY FRAMEWORK

This appendix provides descriptions of major laws, regulations, EOs, standards and plans identified in the Regulatory Framework subsection of each of the resource areas analyzed in **Chapter 3** of the EIS. This appendix also elaborates on other relevant policies, agreements, guidance, standards, rules, and regulations which inform the analysis for the various resource areas. The subsection numbers and titles in the headers below correspond to the resource areas in **Chapter 3**.

3.2 Land Use

Federal and State policies and regulations, along with county-level guidance and zoning, create the regulatory framework for land use. Land owned by the U.S. Government is regulated under Federal law. Under the supremacy clause in the U.S. Constitution (Clause 2, Article VI), Federal land is not subject to State or County regulation. For land that is owned by the U.S. Government, the F-1 military zoning district and Federal use map designation is used by the City and County of Honolulu to indicate Federal jurisdiction per the county zoning code (i.e., Land Use Ordinance) and does not provide any land use or development standards.

The U.S. Government's authority to acquire real property interests includes, but is not limited to, 10 United States Code (U.S.C.) Section 2661, *Miscellaneous Administrative Provisions Relating to Real Property*; 10 U.S.C. Section 2663, *Land Acquisition Authorities*; and 10 U.S.C. Section 2802, *Military Construction Projects*. **Section 4.3** discusses the Proposed Action's consistency with relevant sections of Title 10 U.S.C., *Armed Forces*.

The Sikes Act (16 U.S.C. Section 670a–670o), as amended, requires that Integrated Natural Resources Management Plans (INRMPs) for Department of Defense (DoD) installations reflect mutual agreements with Federal and State agencies [e.g., U.S. Fish and Wildlife Service (USFWS)] for conservation, protection, and management of fish and wildlife resources, including recreational hunting (see **Section 3.3**). The Sikes Act notes that land uses are subject to military security and safety requirements, while allowing compatible public access to military installations that do not interfere with military training or operations. Department of Defense Instruction (DoDI) 4715.03, *Natural Resources Conservation Program*, establishes "The principal purpose of DoD lands and waters is to support mission-related activities. Those lands and waters shall be made available to the public for educational or recreational use of natural and cultural resources when such access is compatible with military mission activities, ecosystem sustainability, and other considerations such as security, safety, and fiscal soundness. Opportunities for such access shall be equitably and impartially allocated" (DoD, 2018c; DoD, 2018d). Recreational uses at KTA, Poamoho, and MMR are discussed under Recreation in **Section 3.2.5**.

Executive Order (EO) 11166, *Setting Aside for the Use of the United States Certain Public Lands and Other Property Located at the Makua Military Reservation, Hawaii,* signed by President Lyndon B. Johnson in

1964, establishes in fee simple the U.S. Government-controlled portion of MMR, including access rights to these lands to and from the nearest highway in, upon, and across adjoining properties. The land designated for U.S. Government use through this order are distinct from State-owned land at MMR and not subject to that lease.

Hawai'i has a unique system of classifying and managing lands in which both State and county agencies hold distinct responsibilities. The State Land Use Law is established through HRS Chapter 205, *Land Use Commission*, and describes the framework of land use management and regulation in which all lands in the State are classified into one of four land use districts. Hawai'i land use is guided by the State Land Use District (SLUD) classification and county Land Use Ordinance zoning designation. Real property is classified as urban, rural, agricultural, or conservation SLUD, and classified within the City and County of Honolulu's 26 zoning districts. The State framework for land use management was adopted by the State Legislature in 1961. Laws specific to the conservation district (HRS Chapter 183C) were established and went into effect in 1964; the relevance to KTA, Poamoho, and MMR is discussed under Land Tenure in **Section 3.2.5**.

Land use of public lands in Hawai'i is also guided by 5(f) of the Admission Act; Article 12, Section 4 of the Hawai'i Constitution ("the lands granted to the State of Hawaii by Section 5(b) of the Admission Act . . . shall be held as a public trust for native Hawaiians and the general public"), case law, and HRS 171-18. HRS 171-18 states that all proceeds and income from the sale, lease, or other disposition of these lands "shall be held as a public trust for the support of the public schools and other public educational institutions, for the betterment of the conditions of native Hawaiians as defined in the Hawaiian Homes Commission Act, 1920, as amended, for the development of farm and home ownership on a widespread basis as possible, for the making of public improvements, and for the provisions of lands for public use" (HRS 171-18).

The 1959 Admission Act (Public Law 86-3, 73 Statute 4) created a compact with the United States and was duly approved by the majority of the voters of Hawai'i to admit Hawai'i into the United States.

Land under Section 5(f) of the Admission Act is defined as follows:

> *The lands granted to the State of Hawai'i by subsection (b) of this section and public lands retained by the United States under subsections (c) and (d) and later conveyed to the State under subsection (e), together with the proceeds from the sale or other disposition of any such lands and the income therefrom, shall be held by said State as a public trust for the support of the public schools and other public educational institutions, for the betterment of the conditions of native Hawaiians, as defined in the Hawaiian Homes Commission Act, 1920, as amended, for the development of farm and homeownership on as widespread a basis as possible for the making of public improvements, and for the provision of lands for public use. Such lands, proceeds, and income shall be managed and disposed of for one or more of the foregoing purposes in such manner as the constitution and laws of said State may provide, and their use for any other object shall constitute a breach of trust for which suit may be brought by the United States. The schools and other educational institutions supported, in whole or in part out of such public trust shall forever remain under the exclusive control of said State; and no part of the proceeds or income from the lands granted under this Act shall be used for the support of any sectarian or denominational school, college, or university.*

3.3 Biological Resources

Regulations are enacted to protect biological resources by preventing or limiting activities that may harm or reduce species populations. The Army is committed to environmental stewardship and protection, and adheres to regulations including, but not limited to, DoDI 4715.03, Natural Resources Conservation Program; and Army Regulation (AR) 200-1, *Environmental Protection and Enhancement*.

The Endangered Species Act of 1973 (ESA) (16 U.S.C. Section 1531 et seq.) is a Federal law to protect and recover imperiled species and the ecosystems they need to survive and recover. The ESA requires Federal agencies, in consultation with USFWS and the National Marine Fisheries Service (NMFS), to ensure that actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of any listed species or result in the destruction or adverse modification of designated critical habitat of such species. Under the ESA, jeopardy occurs when an action is reasonably expected, directly or indirectly, to diminish numbers, reproduction, or distribution of a species so that the likelihood of survival and recovery in the wild is appreciably reduced. An endangered species is defined by the ESA as any species in danger of extinction throughout all or a significant portion of its range. A threatened species is defined by the ESA as any species likely to become an endangered species in the foreseeable future. Unless authorized by USFWS or NMFS through a permit or incidental take statement, the ESA prohibits any action that causes a "take" of any listed species. Take is defined as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct" (16 U.S.C. Section 1532). Harm can further be defined as an act that may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering. Listed plants are not protected from incidental take, but it is illegal to collect or maliciously harm them on Federal land. In accordance with 50 CFR Section 17.71 regarding prohibitions for endangered and threatened wildlife and plants, any species listed as threatened after September 26, 2019, has a different level of protection than endangered species because a 4(d) rule will be issued with the listing specifying actions that would not be prohibited under the act for that newly listed species.

USFWS designates critical habitat when it is determined that habitat is essential to the conservation of a threatened or endangered species. Federal agencies must ensure that their activities do not destroy or adversely modify designated critical habitat to the point that it will no longer support in the species' recovery. Areas that are owned or controlled by DoD are exempt from a critical habitat designation if it is determined that a signed INRMP provides a benefit to the species; these plans are required under the Sikes Act.

The Sikes Act [16 U.S.C. Section 670a (a)(2)] authorizes the development of integrated installation plans (i.e., INRMP) and reflects mutual agreement of the parties concerning conservation, protection, and management of fish and wildlife resources. The Sikes Act is discussed in more depth in **Section 3.2.2**.

The Migratory Bird Treaty Act (MBTA) of 1918 (16 U.S.C. Sections 703–712) and EO 13186, *Responsibilities of Federal Agencies to Protect Migratory Birds*, require Federal agencies to minimize or avoid impacts on migratory birds. Under the MBTA, it shall be unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill; attempt to take, capture, or kill; or possess migratory birds or their nests or eggs at any time unless permitted by regulation. A Memorandum of Understanding (MOU) was executed in September 2014 between DoD and USFWS to promote the conservation of migratory birds. The MOU expired in 2019; however, an addendum signed on April 21, 2022, extends the MOU indefinitely or until either party determines the MOU needs to be revised (DoD & USFWS, 2022). Section 315 of the Bob Stump National

Defense Authorization Act for Fiscal Year 2003 (Public Law 107-314, 116 Statute 2458) exempts military readiness activities carried out in accordance with 50 CFR Section 21.15 from the prohibition against the incidental taking of migratory birds. Military readiness activities, as defined in the Bob Stump National Defense Authorization Act and implementing regulations at 50 CFR Section 21.3, include all training and operations of the Armed Forces that relate to combat, and the adequate and realistic testing of military equipment, vehicles, weapons, and sensors for proper operation and suitability for combat use.

The Federal Noxious Weed Act (Public Law 93-629) mandates control of noxious weeds by limiting potential weed seed transport between infested and non-infested sites. EO 13112, *Invasive Species*, and EO 13751, *Safeguarding the Nation from the Impacts of Invasive Species*, require Federal agencies to prevent the introduction of invasive species; provide for their control; and minimize their economic, ecological, and human health impacts.

EO 11990, *Protection of Wetlands*, requires that Federal agencies take actions to minimize or avoid the destruction, loss, or degradation of wetlands and enhance and preserve the natural and beneficial values of wetlands.

The State provides protections for threatened species, endangered species, and species of concern under HAR Chapter 13-107, *Threatened and Endangered Plants*; HAR Chapter 13-124, *Indigenous Wildlife, Endangered and Threatened Wildlife, Injurious Wildlife, Introduced Wild Birds, and Introduced Wildlife*; and HRS Chapter 195D, *Conservation of Aquatic Life, Wildlife, and Land Plants.* These regulations work to conserve and protect native plants and animals and to manage non-native species. Additionally, HAR Chapter 13-122, *Rules Regulating Game Bird Hunting, Field Trials, and Commercial Shooting Preserves*, and HAR Chapter 13-123, *Rules Regulating Game Mammal Hunting*, provide hunting regulations.

3.4 Historic and Cultural Resources

Regulations are enacted to protect and prevent or limit activities that may cause adverse impacts on historic and cultural resources. The Army is committed to environmental stewardship and protection, and adheres to regulations including, but not limited to, DoDI 4715.16, *Cultural Resources Management*, and AR 200-1, *Environmental Protection and Enhancement* (see **Section 3.4.5** under Current Management Efforts for additional details on the Army's avoidance measures for historic and cultural resources).

The NHPA of 1966, as amended (54 U.S.C. Section 300101 *et seq.*), establishes the national policy for the preservation of historic properties. The regulations at 36 CFR Part 800 implement Section 106 of the NHPA (54 U.S.C. Section 306108). The regulations detail a process by which Federal agencies consider the potential effects of their undertakings on historic properties and afford the Advisory Council on Historic Preservation (ACHP), State Historic Preservation Officers (SHPOs), and other consulting parties the opportunity to comment.

Potential effects on historic properties resulting from ongoing activities on State-owned land have been considered through various Section 106 consultations. For example, ongoing activities within the KTA and Poamoho portions of the ROI are subject to provisions of the 2018 Final Programmatic Agreement among the U.S. Army Garrison, Hawaii, the Hawaii State Historic Preservation Officer, and the Advisory Council Regarding Routine Military Training Actions and Related Activities at United States Army Training Areas and Ranges on the Island of O'ahu, Hawai'i (2018 Section 106 PA) (USAG-HI, 2018a). The 2018 Section 106 PA contains stipulations that satisfy the Army's Section 106 compliance responsibilities for ongoing

military activities on State-owned land at KTA and Poamoho. Undertakings related to ongoing use of State-owned land at MMR have been considered through the Section 106 process and are implemented through 10 documents, which have resulted in a finding of no adverse effects (see **Section 3.4.5** under Current Management Efforts for details on the Army's avoidance measures). These documents include the following:

- A PA (USAG-HI, 2009a) for routine military training at MMR that was executed in 2009 and expired in 2014
- A PA for Traditional Hawaiian use of Ukanipō Heiau
- A Memorandum of Agreement (MOA) (USAG-HI, 2015b) currently in place and expiring in September 2025 that addresses vegetation management and the potential impacts on historic properties, specifically petroglyphs, at MMR
- Seven separate Section 106 consultation documents regarding potential adverse effects on historic properties from intelligence training, blank-fire maneuver training, bivouac training, non-live-fire aviation training, vegetation management away from petroglyphs, facility management, road maintenance, and the associated measures to avoid effects on historic properties

The Army is also required to comply with NAGPRA, which provides a process for Federal agencies to address discoveries of human remains and to repatriate certain cultural items to Indian tribes, Alaska Native Corporations, and Native Hawaiian Organizations (NHOs). It is Army policy to leave burials in place and undisturbed whenever possible. Inadvertent discoveries of NAGPRA cultural items are protected from additional disturbance, and all Army actions are conducted in accordance with the implementing regulations of NAGPRA at 43 CFR Section 10.4.

3.5 Cultural Practices

See **Section 3.5.2**.

3.6 Hazardous Substances and Hazardous Wastes

Regulations are enacted to manage hazardous substances and petroleum products, and streamline waste management. The Army is committed to environmental stewardship and protection, and adheres to the regulations pertinent to KTA, Poamoho, and MMR for potential impacts as follows:

CERCLA (42 U.S.C. Section 9601 *et seq.*), as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986, regulates the cleanup of uncontrolled or abandoned hazardous waste sites, accidents, spills, and other emergency releases of pollutants and contaminants into the environment. CERCLA also assigns liability to the parties responsible for any release and assures their cooperation in the cleanup. SARA reauthorizes CERCLA to continue cleanup activities around the country. CERCLA provides the framework and guidance for Federal facilities to identify and cleanup contaminated property and plays a substantial role in the transfer of DoD sites.

The State provides regulations for handling hazardous waste under HRS Chapter 342J, along with related implementing rules. The hazardous waste program of the State is preventative, supporting education about hazardous waste and its reduction and recycling, as well as regulatory guidance.

CERCLA regulations are found within the National Oil and Hazardous Substances Pollution Contingency Plan (National Contingency Plan; 40 CFR Part 300), which applies to cleanup response actions taken pursuant to CERCLA and hazardous substances spill prevention under Section 311 of the CWA, as amended. The National Contingency Plan provides the organizational structure and procedures for preparing for and responding to discharges of oil and releases of hazardous substances, pollutants, and contaminants.

HRS Section 128D-7, State Contingency Plan, ensures that the State complies with the National Contingency Plan. The Oil Pollution Prevention Regulation, 40 CFR Section 112, addresses specific requirements and provisions for the preparation of Spill Prevention, Control, and Countermeasure (SPCC) Plans. The response actions as described in the U.S. Army Corps of Engineers (USACE) SPCC Plan and the USAG-HI SPCC Plan, which applies to Federal military installations in Hawai'i, are applicable to the State-owned lands and are considered appropriate and reasonable for effective response actions (USAG-HI, 2012).

Title III of SARA authorized the Emergency Planning and Community Right-to-Know Act (42 U.S.C. Section 11001 *et seq.*). This act was designed to help local communities protect public health, safety, and the environment from chemical hazards.

The Pollution Prevention Act (42 U.S.C. Section 13101 *et seq.*) is a national policy to reduce or eliminate waste generation at the source whenever feasible.

RCRA (42 U.S.C. Section 6901 *et seq.*) gives USEPA the authority to control hazardous waste from cradle to grave. Subtitle C of RCRA establishes guidelines for the generation, transportation, treatment, storage, and disposal of hazardous wastes. Subtitle I of RCRA governs the storage of materials in underground storage tanks (UST), including the storage of unused products (including gasoline) and wastes. The State is authorized to implement Corrective Action Programs under RCRA. RCRA Section 3006 and Section 9004 allow the state to be authorized to administer RCRA hazardous waste programs and the UST program.

The TSCA (15 U.S.C. Section 2601 *et seq.*) provides USEPA with authority to implement reporting, record keeping, and testing requirements, and restrictions relating to chemical substances and/or mixtures. The TSCA (40 CFR Parts 700–799) gives USEPA comprehensive authority to regulate any chemical substance whose manufacturing, processing, distribution in commerce, use, or disposal may present an unreasonable risk of injury to health or the environment. Federal facilities are affected by regulations under the TSCA because the regulations address the handling and disposal of substances regulated under the TSCA and the remediation of asbestos and radon.

State regulations for the management of asbestos-containing material (ACM) and lead-based paint (LBP) are codified in HRS Chapter 342P, which establishes rules to control and prohibit asbestos pollution and LBP hazards, and regulates asbestos and lead abatement for the State. The USAG-HI Asbestos Management Plan and Lead Hazard Management Plan establish Army practices for assessments, abatement, and disposal of asbestos and lead, respectively (USAG-HI, 2001b; USAG-HI, 2001c).

EO 12088, *Federal Compliance with Pollution Control Standards*, requires all Federal agencies to comply with environmental laws and fully cooperate with USEPA, State, interstate, and local agencies to prevent, control, and abate environmental pollution.

The Hazardous Materials Transportation Act (49 U.S.C. Section 5101 *et seq.*) gives the Hawai'i Department of Transportation (HDOT) authority to regulate shipments of hazardous materials by air, sea, highway, or

rail. The HDOT Hazardous Materials Program administers the regulations relating to transporting hazardous materials through areas under HDOT's control.

AR 200-1, *Environmental Protection and Enhancement*, governs the use, transport, and disposal of all hazardous materials and regulated waste by military or civilian personnel and on-post tenants and contractors at all Army facilities. Army Pamphlet 710-7, *Hazardous Material Management Program*, establishes the standard Army practices for the centralized control and management of hazardous substances. USAG-HI adheres to USAG-HI Regulation 200-4, *Installation Hazardous Waste Management Plan* (IHWMP; USAG-HI, 2018c), which provides plans and procedures for handling, storing, and disposal of hazardous substances and hazardous wastes on USAG-HI installations and training areas.

Army Pamphlet 385-24, *The Army Radiation Safety Program,* implements AR 385-10, *The Army Safety Program*, which prescribes radiation safety policies, requires Army organizations to develop management and quality control processes to control and mitigate radiation hazards associated with Army activities and equipment, and ensures that exposure to ionizing radiation is kept as low as reasonably possible.

HRS Chapter 342L, *Underground Storage Tanks*, and its implementing rules in HAR Chapter 11-280.1, *Underground Storage Tanks*, regulate compliance with USTs containing petroleum or other substances identified by the Hawai'i State Department of Health (DOH). The regulations govern inspection, compliance, record keeping, and maintenance of publicly available records for UST locations and any violations associated with permitted USTs.

The Defense Environmental Restoration Program was formally established by Congress in 1986 to provide for the cleanup of DoD property at active installations and formerly used defense sites throughout the United States and its territories. The two restoration programs under the Defense Environmental Restoration Program are the Installation Restoration Program and the Military Munitions Response Program (MMRP). The MMRP addresses potential risks associated with MEC on nonoperational ranges at current and former defense sites.

On February 12, 1997, USEPA promulgated the Military Munitions Rule, deciding not to impose the regulatory requirements of RCRA Subtitle C on operational military ranges. The Military Munitions Rule states that military munitions are not solid wastes under RCRA's Subtitle C regulations and consequently are not regulated as hazardous waste. If military munitions are used or fired, land off range, and are not promptly rendered safe or retrieved, then the munitions would be a solid waste and potentially subject to the corrective action authorities under RCRA Sections 3004(u), 3004(v), and 3008(h) or the imminent and substantial endangerment authorities of RCRA Section 7003.

All training at KTA, Poamoho, and MMR, including the State-owned lands, adheres to procedures and requirements in USARHAW Regulation 350-19, *Installations Ranges and Training Areas*, AR 350-19, and the SOPs (USAG-HI, 2020a; USAG-HI, 2020b; USAG-HI, 2021e). In addition, training within the State-owned lands at KTA, Poamoho, and MMR adhere to the requirements of the leases (DLNR, 1964a; DLNR, 1964b; DLNR, 1964c; DA & DLNR, 2005).

3.7 Air Quality and Greenhouse Gases

Under the Clean Air Act, USEPA has established National Ambient Air Quality Standards (NAAQS) for several different air pollutants that are considered harmful to public health and the environment. These pollutants, referred to as criteria pollutants, are carbon monoxide (CO), sulfur dioxide (SO_2), nitrogen

dioxide (NO_2), ozone (O_3), suspended particulate matter measured less than or equal to 10 microns in diameter (PM_{10}) and less than or equal to 2.5 microns in diameter ($PM_{2.5}$), and lead. CO, SO_2, lead, and some particulates are emitted directly into the atmosphere from emission sources. O_3, nitrogen dioxide, and some particulates are formed through atmospheric chemical reactions that are influenced by weather, ultraviolet light, and other atmospheric processes. Volatile organic compounds and nitrogen oxide emissions are used to represent O_3 generation because they are precursors to O_3. Since the phase-out of leaded fuels in the 1970s and 1980s, lead emissions have been negligible from the types of emission sources under this Proposed Action. As such, they are not included in this air quality analysis.

The NAAQS protect against adverse health and welfare impacts. Areas that are and have historically been in compliance with the NAAQS or have not been evaluated for NAAQS compliance are designated as attainment areas, which is the designation for all of O'ahu. Areas that do not meet the NAAQS are designated as nonattainment areas. Areas that have transitioned from nonattainment to attainment are designated as maintenance areas and are required to adhere to maintenance plans to ensure continued attainment until a 20-year period has lapsed and attainment is continued. The USEPA General Conformity Rule applies to Federal actions occurring in nonattainment or maintenance areas when the total direct and indirect emissions of nonattainment and maintenance pollutants (or their precursors) exceed specified thresholds. The General Conformity Rule does not apply in areas designated as attainment.

The Hawai'i DOH, Clean Air Branch (CAB) also regulates and monitors air pollutants under HAR Chapter 11-59, Ambient Air Quality Standards, and HAR Chapter 11-60.1, Air Pollution Control. The CAB has established its own ambient air quality standards for criteria pollutants, and these standards are stricter than the NAAQS for CO and NO_2 (DOH-CAB, 2019). The CAB also has promulgated an additional air quality standard for hydrogen sulfide. Additional Hawai'i air pollution control laws are found in HRS Chapter 342B. Although not directly related to air quality, HRS Chapter 342C addresses O_3 layer protection, and Act 17 of Session Laws of Hawai'i 2018 requires this EIS to consider sea level rise. The Hawai'i greenhouse reduction plan cited in HAR Section 11-60.1-201 is not applicable to the State-owned lands on the O'ahu training areas because it is for stationary sources that emit at least 100,000 tons per year of carbon dioxide equivalent emissions, whereas the State-owned lands do not have any such sources.

Army Directive 2020-08, *U.S. Army Installation Policy to Address Threats Caused by Changing Climate and Extreme Weather*, requires Army installations to assess, plan for, and adapt to the projected impacts of changing climate and extreme weather by adding the results of climate change prediction analysis tools into all facility and infrastructure-related plans, policies, and procedures. The *Army Climate Resilience Handbook*, dated August 2020, instructs Army planners on the process to systematically assess climate exposure impact risk and to incorporate these findings into the planning process. The Army also has implemented an Army Climate Strategy and follows the DoD Climate Adaptation Plan (Army, 2022). The Army used the Army Climate Assessment Tool in this EIS, and now uses the DoD Climate Assessment Tool (DCAT), to identify potential climate change threats and to rank the relative risk each threat presents to a given Army installation in 2050 and 2085. The tools also include summaries of regional climate change impacts as developed by the U.S. Global Change Research Program.

This EIS addresses air quality impacts in accordance with EO 13990, *Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis;* the Army's March 4, 2021, memorandum titled *Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in Army National Environmental Policy Act Reviews;* and CEQ's January 2023 interim guidance titled *National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change*. This EIS

qualitatively addresses direct and indirect GHG emissions from the Proposed Action, the social costs (i.e., dollar estimate of damage stemming from emissions), and the impacts of ongoing climate change on the Proposed Action. A quantitative, full life-cycle analysis of GHG emissions (i.e., carbon dioxide, methane, and nitrous oxide emissions from direct Army activities at KTA, Poamoho, and MMR as well as from indirect activities such as manufacturing and shipping equipment and materiel, and troop movements to and from these training areas) and their associated social costs has not been performed because there are no data inputs reasonably available to support such calculations for a real estate transaction such as the Proposed Action. No munitions with DU have ever been used on any of the installations under study in this EIS, and therefore no analysis of airborne DU is included.

3.8 Noise

The Noise Control Act of 1972 (42 U.S.C. Section 4901 *et seq*.) directs Federal agencies to comply with applicable Federal and State noise control regulations to the fullest extent consistent with agency missions. Other noise laws include the Aviation Safety and Noise Abatement Act, the Control and Abatement of Aircraft Noise, and the Sonic Boom Act.

In Hawai'i, noise pollution regulations are found in HRS Chapter 342F. The Hawai'i DOH Indoor and Radiological Health Branch regulates noise in accordance with HAR Chapter 11-46, Community Noise Control, which limits sound generated by new or expanded developments. It provides for the prevention, control, and reduction of noise pollution. HAR Section 11-46-3 defines maximum permissible sound levels for three classifications of land use (Class A, Class B, and Class C) by zoning district and provides for the reduction and control of excessive noise sources. **Table J-1** outlines the maximum sound level at the property boundary for permanent stationary sources according to land use. The Proposed Action does not involve introduction of, or modifications to, stationary sources; therefore, HAR Chapter 11-46 does not apply, so the table is provided for informational purposes only.

Table J-1: Hawai'i Maximum Permissible Sound Levels

Land Use[1]	Maximum Permissible Sound Levels[2]	
	Daytime dBA (7 a.m. – 10 p.m.)	Nighttime dBA (10 p.m. – 7 a.m.)
Zone A: Residential, conservation, preservation, public space, or similar land use.	55	45
Zone B: Multi-family dwellings, business, commercial, hotel, resort, or similar use.	60	50
Zone C: Agriculture, county, industrial, or similar use.	70	70

1. For mixed zoning districts, the primary land use designation is used to determine the permissible sound level.
2. Sound limits for impulsive noise is 10 dBA above the maximum permissible sound levels shown.

See **Section 3.8.2** for DoD guidance informing noise abatement planning.

3.9 Geology, Topography, and Soils

AR 350-19 provides policy and guidance for managing and operating Army ranges and training lands to support their long-term viability. The Range Complex Master Plan's ITAM Program has four major components: Range and Training Land Assessment, LRAM, Training Requirement Integration, and Sustainable Range Awareness. The LRAM component guides repairs, maintenance, and reconfiguration of Army lands to meet maneuver training requirements. It is the crucial enabler for sustaining realistic training conditions and supporting unit mission requirements. Data collected by the ITAM Program includes topographic features, soil characteristics, and surface disturbances, which are used to estimate soil erosion, ground cover, and disturbance and monitoring for the Land Restoration Program.

The Farmland Protection Policy Act (7 CFR Part 658) sets out criteria developed by the Secretary of Agriculture, in cooperation with other Federal agencies, pursuant to Section 1541(a) of the Farmland Protection Policy Act (7 U.S.C. Section 4202(a)). Federal agencies are to use the criteria (1) to identify and take into account the adverse effects of their programs on the preservation of farmland, (2) to consider alternative actions, as appropriate, that could lessen adverse effects, and (3) to ensure that their programs, to the extent practicable, are compatible with the State and units of local government and private programs and policies to protect farmland (7 CFR Section 658.1). The Farmland Protection Policy Act also provides guidelines to assist agencies in using the criteria.

HRS Chapter 205, Part III, Land Use Commission, establishes policy for Important Agricultural Lands in Hawai'i. Each county is to identify and map potential Important Agricultural Lands within its jurisdiction using a public involvement process. Landowner incentives, such as tax credits and loan guarantees, encourage the voluntary designation of lands as Important Agricultural Land when they meet specific criteria. The State Land Use Commission's Important Agricultural Lands identified through the Commission's declaratory ruling process do not include the State-owned land at KTA, Poamoho, and MMR (State LUC, 2022).

In accordance with 32 CFR Part 651, Environmental Analysis of Army Actions, and HRS Chapter 343, Environmental Impact Statements, consideration of geologic hazards associated with climate change, including sea level rise, are to be evaluated in an EIS based on the best available scientific data.

In addition, all training at KTA, Poamoho, and MMR, including on State-owned lands, adheres to procedures, requirements, and management measures outlined in USARHAW Regulation 350-19*;* AR 350-19; Dust and Soils Management and Monitoring Plan (KTA and MMR); Erosion Control Best Management Practices Program Plan; INRMP; SPCC Plan; Storm Water Management Plan; SOPs for KTA, Poamoho, and MMR; and the 1964 leases for the State-owned lands at KTA, Poamoho, and MMR. These regulations and procedures ensure the minimization of impacts on geological and soil resources during training activities.

3.10 Water Resources

AR 350-19, in coordination with the ITAM Program, provides policy and guidance for managing and operating Army ranges and training lands to support their long-term viability. The ITAM Program—along with the adoption and use of BMPs for riparian zones and other areas and specific watershed management projects—provides the mechanism for attaining watershed management goals by maintaining the integrity of stream courses, reducing the volume of surface runoff originating from disturbed areas and running directly into surface water, minimizing the movement of pollutants (e.g.,

nutrients) and sediment to surface water and groundwater, and stabilizing exposed mineral soil areas through natural or artificial revegetation means.

The Coastal Zone Management Act (CZMA) (16 U.S.C. Section 1451 *et seq*.) is the Federal law that protects the coastal environment from growing demands associated with residential, recreational, commercial, and industrial uses. CZMA provisions help states develop coastal management programs to manage and balance the coastal zone's competing uses. In 1977, Hawai'i established the Coastal Zone Management (CZM) Program with HRS Chapter 205A, which requires that Federal projects are reviewed for consistency with the Hawai'i CZM Program. Under this program, all the State's lands are considered subject to consistency review. The CZM objectives are to ensure effective management, beneficial use, protection, and development of the Hawai'i coastal zone. **Section 4.3** analyzes the Proposed Action's consistency with the CZMA and the State's CZM law.

The Safe Drinking Water Act (SDWA) (42 U.S.C. Section 300f–300j *et seq*.) is the Federal law that protects public drinking water supplies throughout the United States. Under the SDWA, USEPA sets standards for drinking water quality. USEPA's regulations implementing the SDWA requirements are found in 40 CFR Parts 141–149. Federal standards promulgated under the SDWA are also typically used to evaluate or assess groundwater quality. Any federally funded project with the potential to contaminate a designated sole-source aquifer is subject to review by USEPA. Federal SDWA Groundwater Protection Programs are generally implemented at the State level. In Hawai'i, the Groundwater Protection Program is managed by the DOH Safe Drinking Water Branch (SDWB), which has prepared groundwater contamination maps for the State. The State level equivalent of the SDWA and National Primary Drinking Water Regulations is the HAR Chapter 11-20, Public Water Systems. This chapter sets the standards for the State Primary Drinking Water Regulations. This regulation also covers the monitoring, analytical requirements, inspections, exemptions, emergency provisions and notification requirements. **Section 3.10.5** describes existing conditions of groundwater and groundwater quality in the ROI.

The SDWB is responsible for safeguarding public health by protecting Hawai'i's drinking water sources (surface water and groundwater) from contamination and ensuring that owners and operators of public water systems provide safe drinking water to the community. The SDWB protects drinking water through the Underground Injection Control (UIC) Program, the Groundwater Protection Program, and the Source Water Assessment and Protection Program. The UIC Program (HAR Chapter 11-23, Underground Injection Control) serves to protect the quality of Hawai'i's underground sources of drinking water from chemical, physical, radioactive, and biological contamination that could originate from injection well activity. The Groundwater Protection Program safeguards groundwater quality and public health by protecting Hawai'i's groundwater from contamination by monitoring and assessing groundwater quality, identifying and prioritizing groundwater contamination threats, and mitigating priority contamination threats and preventing contamination. The SDWB provides information on DOH's ongoing water quality work in a Water Quality Plan that establishes a framework for comprehensive water resources planning to address water quantity and quality issues in Hawai'i.

The CWA (33 U.S.C. Section 1251–1387 *et seq*.) establishes Federal limits, through the National Pollutant Discharge Elimination System (NPDES) Program, on the amounts of specific pollutants that can be discharged into surface waters to restore and maintain the chemical, physical, and biological integrity of the water. The NPDES is a permit program that regulates where a point source discharges a pollutant to "waters of the United States". The DOH administers the NPDES Program in Hawai'i under HAR Chapter 11-55. HAR Chapter 11-54 regulations specify the water quality condition for "State waters," as defined by HRS Section 342D-1, *Water*

Pollution, including all waters (fresh, brackish, or salt) around and within the State, including but not limited to coastal waters, streams, rivers, drainage ditches, ponds, reservoirs, canals, groundwaters, and lakes; and HRS Chapter 342E, *Nonpoint Source Pollution Management and Control*. The purpose of HRS Chapter 342E is to reduce, control, and mitigate nonpoint source pollution in the State.

Section 404 of the CWA, *Water Quality Certifications,* authorizes the Secretary of the Army, acting through the Chief of Engineers, to issue permits for the discharge of dredge or fill into wetlands and other waters of the United States. Any discharge of dredge or fill into the waters of the United States requires a permit from USACE. Section 404 does not apply to the Proposed Action because there would be no alteration of stream channels and no pumping of groundwater within the State-owned lands.

Under Section 401 of the CWA, the DOH Clean Water Branch is responsible for issuing or denying Section 401 *Water Quality Certifications* for any project or activity that requires a Federal license or permit and may result in a water pollutant discharge to State surface waters.

The National Flood Insurance Act (42 U.S.C. Section 4001 *et seq*.) establishes the National Flood Insurance Program, a voluntary floodplain management program for communities that is implemented by FEMA. Any action within a FEMA-mapped floodplain in a participating community must follow the community's FEMA-approved floodplain management regulations. EO 11988, *Floodplain Management,* requires Federal agencies to avoid, to the extent possible, the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development unless it is the only practicable alternative.

The National Wetlands Inventory (NWI) compiled by USFWS has identified and mapped most of the known wetlands in the continental United States, including those on military installations. DoDI 4715.3 states that installations shall ensure "no net loss" of wetlands. To manage wetlands properly, installations have used the NWI and subsequent planning level surveys to determine the extent and location of wetlands across their installation. By identifying wetlands early in the NEPA process and using a "Go/No-Go" approach where avoidance is preferred to impacts, installations, including those in Hawai'i, have the ability to avoid costly mitigation and potential delays in the implementation of a Proposed Action.

As described in **Section 3.9**, SOPs are also used in reviewing applications for USACE permits under Section 404 of the CWA by highlighting critical portions of the USACE implementing regulations to be used in reviewing permit applications. In addition, all training at KTA, Poamoho, and MMR, including on State-owned lands, adheres to procedures and requirements outlined in USARHAW Regulation 350-19*;* AR 350-19; Erosion Control Best Management Practices Program Plan; INRMP; SPCC Plan; Storm Water Management Plan; SOPs for KTA, Poamoho, and MMR; and the 1964 leases for the State-owned lands at KTA, Poamoho, and MMR. These regulations and procedures ensure the minimization of impacts on water resources during training activities.

The State Water Code (HRS Chapter 174C) was enacted into law by the 1987 State Legislature for the purpose of protecting Hawai'i's water resources. It provides for the legal basis and establishment of the State's Commission on Water Resource Management (CWRM). CWRM administers the State Water Code, is the primary steward of water resources within Hawai'i and has broad powers and responsibilities to protect and manage water resources. This includes the authority and duty to develop plans and programs to conserve and manage water use within the State's aquifer sectors and systems in which water consumption approaches the aquifer's sustainable yield.

3.11 Socioeconomics

NEPA, CEQ's NEPA regulations, HRS Section 343, and HAR Chapter 11-200.1 require an approach for planning and decision-making that involves evaluation of actions that may have an impact on the human environment, including on social and economic resources. The CEQ NEPA regulations state that the "human environment means comprehensively the natural and physical environment and the relationship of present and future generations of Americans with that environment" [40 CFR Section 1508.1(m)].

Analysis of planned actions under NEPA and HEPA must discuss and provide appropriate consideration to effects on the human environment, which include both natural and physical environments and the relationship on present and future generations of individuals within those environments. CEQ NEPA regulations state that when economic or social effects and natural or physical environmental effects are interrelated, the EIS discusses these effects on the human environment [40 CFR Section 1502.16(b)]. Regulations implementing HEPA also require the consideration of effects on economic and social welfare [HAR Section 11-200.1-13(b)(4)].

3.12 Environmental Justice

The Army implements environmental justice analysis requirements in accordance with NEPA, the following EOs listed in this section, and existing DoD and Army policies:

- EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* (February 11, 1994), directs Federal agencies to identify and address the disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations.
- EO 13045, *Protection of Children from Environmental Health Risks and Safety* Risks (April 21, 1997), specifically indicates that environmental justice analysis should consider environmental risks to health or safety that are attributable to products or substances that the child is likely to come into contact with or ingest.
- EO 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government* (January 20, 2021), directs agencies to evaluate whether their policies generate racially inequitable results when implemented and to make necessary changes to ensure underserved communities are properly supported. In acknowledgement that this work would require multi-generational commitment and whole-of-government approach. The 2022 *Department of Defense Equity Action Plan*, pursuant to EO 13985, includes a strategy to advance equity and rectify past harms resulting from environmental and other impacts from defense activities on ancestral lands.
- EO 14008, *Tackling the Climate Crisis at Home and Abroad* (January 27, 2021), amends EO 12898 to create, within the Executive Office of the President, a White House Environmental Justice Interagency Council (Interagency Council) and called for the Interagency Council to provide recommendations for further updating EO 12898.

- EO 14031, Advancing Equity, Justice, and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islanders (May 28, 2021), seeks to eliminate barriers to equity and justice for these populations. The 2022 Department of Defense Equity Action Plan, pursuant to EO 13985, includes a strategy to advance equity and rectify past harms resulting from environmental and other impacts from defense activities on ancestral lands.
- EO 14091, *Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government* (February 16, 2023), builds on EO 13985 by mandating a whole-of-government, multi-generational commitment to extending and strengthening equity-advancing requirements to support underserved community workforces, economy, housing, equity in health (including mental and behavioral health), civil rights, and equal justice under law.
- EO 14096 issued in April 2023 directs all Federal agencies to prioritize outreach to communities with environmental justice concerns, which can include all demographics, and possible legacy pollution and systemic treatment. This involves providing and encouraging engagement opportunities for the public to share concerns and participate in decision-making such as revising agency procedures, which is especially encouraged for people affected by Federal actions. Those who do not normally engage will be notified and provided tools to further assist in the decision-making process.

3.13 Transportation and Traffic

The HDOT Highways Division and the City and County of Honolulu's DFM implement national standards for roadways and circulation in accordance with the *Statewide Federal-Aid Highways 2035 Transportation Plan* (HDOT, 2014), which is the statewide long-range surface transportation plan for the State of Hawai'i. The *2035 O'ahu Regional Transportation Plan* (ORTP) was prepared by the O'ahu Metropolitan Planning Organization (OahuMPO) and is also incorporated into the statewide plan (OahuMPO, 2011). OahuMPO approved the 2045 ORTP on April 27, 2021 (OahuMPO, 2021). Other regulatory policies and procedures related to the construction, operation, and management of roadways include the Transportation Research Board's *Highway Capacity Manual*, 2010 edition; the American Association of State Highway and Transportation Official's *Policy on Geometric Design of Highways and Streets* and *Highway Safety Manual*; and the HDOT Highway Division's *2005 Standard Specifications and Special Provisions*.

3.14 Health and Human Safety

Numerous Federal and State regulations have been enacted for the well-being of workers and the general population, including the Occupational Safety and Health Act of 1970 (29 U.S.C. Section 651 *et seq.*), which established laws and regulations to ensure safe working conditions through enforcing standards and training requirements and is administered by OSHA. EO 12196, *Occupational Safety and Health Programs for Federal Employees*; DoDI 6055.01, *DoD Safety and Occupational Health Program*; and DoDI 6055.05, *Occupational and Environmental Health*, set safety and health guidelines for DoD employees in accordance with OSHA standards.

The Hawai'i Occupational Safety and Health Division administers the Hawai'i Occupational Safety and Health Law (HRS Chapter 396) and has jurisdiction over private sector employment on Federal land, including military installations, with some exceptions.

The Army has established various regulations and guidance documents to implement safety requirements of DoD policies, including DoDI 6055.01; DoDI 6055.05; DoDI 6055.06, *DoD Fire and Emergency Services Program*; DoDI 6055.07, *Mishap Notification, Investigation, Reporting, and Record Keeping*; and DoDI 6055.17, *DoD Emergency Management Program*. AR 385-10, *The Army Safety Program*, established safety standards designed to protect against serious injury, loss of life, and damage to property. AR 385-10 prescribed the Army's safety criteria and standards for operations and safety training. AR 11-35, *Occupational and Environmental Health Risk Management*, sets policies, responsibilities, and procedures for identifying, managing, and controlling occupational and environmental health risks. AR 385-63, *Range Safety*, and Army Pamphlet 385-63, *Range Safety*, include policies, procedures, and standards for risk management during range operations. Per Army Pamphlet 385-64, *Ammunition and Explosives Safety Standards*, SDZs are calculated to determine buffer areas to protect personnel and the public from live-fire operations.

Per Army Pamphlet 385-40, *Army Accident Investigations and Reporting*, which supports AR 385-10, accident reporting requirements are applied during all tactical/combat operations and training. Reporting requirements for occupational accidents are covered under Federal and State regulations. The SOPs for KTA, Poamoho, and MMR instruct all military units to follow Army safety regulations while conducting training activities at those training areas, and it is the responsibility of the Range Safety Officer to ensure the safe operation of the training area (USAG-HI, 2020a; USAG-HI, 2020b; USAG-HI, 2021e).

AR 200-1, *Environmental Protection and Enhancement*, requires installations with unimproved grounds that present a wildfire hazard to develop and implement an IWFMP that is compliant and integral with the INRMP, the installations' existing fire and emergency services program plans, and the ICRMP. Wildland fire management on U.S. Government-controlled lands on O'ahu is implemented by the Army and conducted in accordance with AR 200-1, as well as BOs and the Sikes Act. The IWFMP for O'ahu Installations lays out specific guidance, procedures, and protocols for the prevention and suppression of wildfires on O'ahu training areas, including KTA, Poamoho, and MMR. The IWFMP also describes the methods and procedures necessary to minimize fire frequency, severity, and size while providing military units the freedom to conduct training. The IWFMP and its training area-specific guidance detail the fire prevention briefings given to range users prior to commencement of training, notification lists in case of fire, operational decision charts for fires, and maps of essential firebreaks, fuel breaks, and firefighting infrastructure (USAG-HI 2017a).

In addition, all training at KTA, Poamoho, and MMR, including on State-owned lands, adheres to procedures and requirements outlined in USARHAW Regulation 350-19; AR 350-19; the SOPs for KTA, Poamoho, and MMR; and the 1964 leases for the State-owned lands at KTA, Poamoho, and MMR. These regulations and procedures ensure the safety of Army personnel and the public during training activities.

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Appendix K

Consistency with Hawai‘i State Plan, Environmental Policy, and O‘ahu General Plan

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Appendix K

CONSISTENCY WITH HAWAIʻI STATE PLAN, ENVIRONMENTAL POLICY, AND OʻAHU GENERAL PLAN

Table K-1: Hawaiʻi State Plan, Hawaiʻi Revised Statutes, Chapter 226 S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
Section 226-4: State Goals. In order to guarantee, for the present and future generations, those elements of choice and mobility that insure that individuals and groups may approach their desired levels of self-reliance and self-determination, it shall be the goal of the State to achieve:			
(1) A strong, viable economy, characterized by stability, diversity, and growth, that enables the fulfillment of the needs and expectations of Hawaiʻi's present and future generations	X		
(2) A desired physical environment, characterized by beauty, cleanliness, quiet, stable natural systems, and uniqueness, that enhances the mental and physical well-being of the people.	X		
(3) Physical, social and economic well-being, for individuals and families in Hawaiʻi, that nourishes a sense of community responsibility, of caring, and of participation in community life.	X		
Section 226-5: Objective and Policies for Population. (A) It shall be the objective in planning for the State's population to guide population growth to be consistent with the achievement of physical, economic, and social objectives contained in this chapter; (B) To achieve the population objective, it shall be the policy of this State to:			
(1) Manage population growth statewide in a manner that provides increased opportunities for Hawaiʻi's people to pursue their physical, social and economic aspirations while recognizing the unique needs of each county.			X
(2) Encourage an increase in economic activities and employment opportunities on the neighbor islands consistent with community needs-and desires.			X
(3) Promote increased opportunities for Hawaiʻi's people to pursue their socioeconomic aspirations throughout the islands.			X
(4) Encourage research activities and public awareness programs to foster an understanding of Hawaiʻi's limited capacity to accommodate population needs and to address concerns resulting from an increase in Hawaiʻi's population.			X
(5) Encourage federal actions and coordination among major governmental agencies to promote a more balanced distribution of immigrants among states, provided that such actions do not prevent the reunion of immediate family members.			X

Table K-1: Hawaiʻi State Plan, Hawaiʻi Revised Statutes, Chapter 226 S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
(6) Pursue an increase in federal assistance for states with a greater proportion of foreign immigrants relative to their state's population.			X
(7) Plan the development and availability of land and water resources in a coordinated manner so as to provide for the desired levels of growth in each geographic area.			X
Section 226-6: Objectives and Policies for the Economy in General.			
(A) Planning for the State's economy in general shall be directed toward achievement of the following objectives:			
(1) Increased and diversified employment opportunities to achieve full employment, increased income and job choice, and improved living standards for Hawaiʻi's people, while at the same time stimulating the development and expansion of economic activities capitalizing on defense, dual-use, and science and technology assets, particularly on the neighbor islands where employment opportunities may be limited.	X		
(2) A steadily growing and diversified economic base that is not overly dependent on a few industries, and includes the development and expansion of industries on the neighbor islands.			X
(B) To achieve the general economic objectives, it shall be the policy of this State to:			
(1) Promote and encourage entrepreneurship within Hawaiʻi by residents and nonresidents of the State.			X
(2) Expand Hawaiʻi's national and international marketing, communication, and organizational ties, to increase the State's capacity to adjust to and capitalize upon economic changes and opportunities occurring outside the State.			X
(3) Promote Hawaiʻi as an attractive market for environmentally and socially sound investment activities that benefit Hawaiʻi's people.			X
(4) Transform and maintain Hawaiʻi as a place that welcomes and facilitates innovative activity that may lead to commercial opportunities.			X
(5) Promote innovative activity that may pose initial risks, but ultimately contribute to the economy of Hawaiʻi.			X
(6) Seek broader outlets for new or expanded Hawaiʻi business investments			X
(7) Expand existing markets and penetrate new markets for Hawaiʻi's products and services			X
(8) Assure that the basic economic needs of Hawaiʻi's people are maintained in the event of disruptions in overseas transportation.			X
(9) Strive to achieve a level of construction activity responsive to, and consistent with, State growth objectives.			X
(10) Encourage the formation of cooperatives and other favorable marketing arrangements at the local or regional level to assist Hawaiʻi's small-scale producers, manufacturers, and distributors			X
(11) Encourage labor-intensive activities that are economically satisfying and which offer opportunities for upward mobility.			X
(12) Encourage innovative activities that may not be labor-intensive, but may otherwise contribute to the economy of Hawaiʻi.			X

Table K-1: Hawaiʻi State Plan, Hawaiʻi Revised Statutes, Chapter 226 S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
(13) Foster greater cooperation and coordination between the government and private sectors in developing Hawaiʻi's employment and economic growth opportunities.			X
(14) Stimulate the development and expansion of economic activities which will benefit areas with substantial or expected employment problems.			X
(15) Maintain acceptable working conditions and standards for Hawaiʻi's workers.			X
(16) Provide equal employment opportunities for all segments of Hawaiʻi's population through affirmative action and nondiscrimination measures.			X
(17) Stimulate the development and expansion of economic activities capitalizing on defense, dual-use, and science and technology assets, particularly on the neighbor islands where employment opportunities may be limited.			X
(18) Encourage businesses that have favorable financial multiplier effects within Hawaiʻi's economy, particularly with respect to emerging industries in science and technology.			X
(19) Promote and protect intangible resources in Hawaiʻi, such as scenic beauty and the aloha spirit, which are vital to a healthy economy.			X
(20) Increase effective communication between the educational community and the private sector to develop relevant curricula and training programs to meet future employment needs in general, and requirements of new or innovative potential growth industries in particular.			X
(21) Foster a business climate in Hawaiʻi--including attitudes, tax and regulatory policies, and financial and technical assistance programs--that is conducive to the expansion of existing enterprises and the creation and attraction of new business and industry.			X
Section 226-7 Objectives and Policies for the Economy – Agriculture.			
(A) Planning for the State's economy with regard to agriculture shall be directed towards achievement of the following objectives:			
(1) Viability of Hawaiʻi's sugar and pineapple industries.			X
(2) Growth and development of diversified agriculture throughout the State.			X
(3) An agriculture industry that continues to constitute a dynamic and essential component of Hawaiʻi's strategic, economic, and social well-being.			X
(B) To achieve the agriculture objectives, it shall be the policy of this State to:			
(1) Establish a clear direction for Hawaiʻi's agriculture through stakeholder commitment and advocacy.			X
(2) Encourage agriculture by making best use of natural resources.			X
(3) Provide the governor and the legislature with information and options needed for prudent decision making for the development of agriculture.			X
(4) Establish strong relationships between the agricultural and visitor industries for mutual marketing benefits.			X
(5) Foster increased public awareness and understanding of the contributions and benefits of agriculture as a major sector of Hawaiʻi's economy.			X

Table K-1: Hawaiʻi State Plan, Hawaiʻi Revised Statutes, Chapter 226 S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
(6) Seek the enactment and retention of federal and State legislation that benefits Hawaiʻi's agricultural industries.			X
(7) Strengthen diversified agriculture by developing an effective promotion, marketing, and distribution system between Hawaiʻi's food producers and consumers in the State, nation, and world.			X
(8) Support research and development activities that strengthen economic productivity in agriculture, stimulate greater efficiency, and enhance the development of new products and agricultural by-products.			X
(9) Enhance agricultural growth by providing public incentives and encouraging private initiatives.			X
(10) Assure the availability of agriculturally suitable lands with adequate water to accommodate present and future needs.			X
(11) Increase the attractiveness and opportunities for an agricultural education and livelihood.			X
(12) In addition to the State's priority on food, expand Hawaiʻi's agricultural base by promoting growth and development of flowers, tropical fruits and plants, livestock, feed grains, forestry, food crops, aquaculture, and other potential enterprises.			X
(13) Promote economically competitive activities that increase Hawaiʻi's agricultural self-sufficiency, including the increased purchase and use of Hawaiʻi-grown food and food products by residents, businesses, and governmental bodies as defined under section 103D-104.			X
(14) Promote and assist in the establishment of sound financial programs for diversified agriculture.			X
(15) Institute and support programs and activities to assist the entry of displaced agricultural workers into alternative agricultural or other employment.			X
(16) Facilitate the transition of agricultural lands in economically non-feasible agricultural production to economically viable agricultural uses.			X
(17) Perpetuate, promote, and increase use of traditional Hawaiian farming systems, such as the use of loko iʻa, māla, and irrigated loʻi, and growth of traditional Hawaiian crops, such as kalo, ʻuala, and ʻulu.			X
(18) Increase and develop small-scale farms.			X
Section 226-8 Objective and Policies for the Economy - Visitor Industry. (A) Planning for the State's economy with regard to the visitor industry shall be directed towards the achievement of the objective of a visitor industry that constitutes a major component of steady growth for Hawaiʻi's economy. (B) To achieve the visitor industry objective, it shall be the policy of this State to:			
(1) Support and assist in the promotion of Hawaiʻi's visitor attractions and facilities.			X
(2) Ensure that visitor industry activities are in keeping with the social, economic, and physical needs and aspirations of Hawaiʻi's people.			X

Table K-1: Hawaiʻi State Plan, Hawaiʻi Revised Statutes, Chapter 226 S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
(3) Improve the quality of existing visitor destination areas by utilizing Hawaiʻi's strengths in science and technology.			X
(4) Encourage cooperation and coordination between the government and private sectors in developing and maintaining well-designed, adequately serviced visitor industry and related developments which are sensitive to neighboring communities and activities.			X
(5) Develop the industry in a manner that will continue to provide new job opportunities and steady employment for Hawaiʻi's people.			X
(6) Provide opportunities for Hawaiʻi's people to obtain job training and education that will allow for upward mobility within the visitor industry.			X
(7) Foster a recognition of the contribution of the visitor industry to Hawaiʻi's economy and the need to perpetuate the aloha spirit.			X
(8) Foster an understanding by visitors of the aloha spirit and of the unique and sensitive character of Hawaiʻi's cultures and values.			X
Section 226-9 Objective and Policies for the Economy - Federal Expenditures.			
(A) Planning for the State's economy with regard to federal expenditures shall be directed towards achievement of the objective of a stable federal investment base as an integral component of Hawaiʻi's economy.			
(B) To achieve the federal expenditures objective, it shall be the policy of this State to:			
(1) Encourage the sustained flow of federal expenditures in Hawaiʻi that generates long-term government civilian employment;	X		
(2) Promote Hawaiʻi's supportive role in national defense, in a manner consistent with Hawaiʻi's social, environmental, and cultural goals by building upon dual-use and defense applications to develop thriving ocean engineering, aerospace research and development, and related dual-use technology sectors in Hawaiʻi's economy;	X		
(3) Promote the development of federally supported activities in Hawaiʻi that respect statewide economic concerns, are sensitive to community needs, and minimize adverse impacts on Hawaiʻi's environment;	X		
(4) Increase opportunities for entry and advancement of Hawaiʻi's people into federal government service.	X		
(5) Promote federal use of local commodities, services, and facilities available in Hawaiʻi.	X		
(6) Strengthen federal-state-county communication and coordination in all federal activities that affect Hawaiʻi.	X		
(7) Pursue the return of federally controlled lands in Hawaiʻi that are not required for either the defense of the nation or for other purposes of national importance, and promote the mutually beneficial exchanges of land between federal agencies, the State, and the counties.	X		
Section 226-10 Objective and Policies for the Economy - Potential Growth Activities.			
(A) Planning for the State's economy with regard to potential growth activities shall be directed towards achievement of the objective of development and expansion of potential growth activities that serve to increase and diversify Hawaiʻi's economic base.			
(B) To achieve the potential growth activity objective, it shall be the policy of this State to:			

Table K-1: Hawaiʻi State Plan, Hawaiʻi Revised Statutes, Chapter 226 S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
(1) Facilitate investment and employment growth in economic activities that have the potential to expand and diversify Hawaiʻi's economy, including but not limited to diversified agriculture, aquaculture, renewable energy development, creative media, health care, and science and technology-based sectors			X
(2) Facilitate investment in innovative activity that may pose risks or be less labor-intensive than other traditional business activity, but if successful, will generate revenue in Hawaiʻi through the export of services or products or substitution of imported services or products;			X
(3) Encourage entrepreneurship in innovative activity by academic researchers and instructors who may not have the background, skill, or initial inclination to commercially exploit their discoveries or achievements;			X
(4) Recognize that innovative activity is not exclusively dependent upon individuals with advanced formal education, but that many self-taught, motivated individuals are able, willing, sufficiently knowledgeable, and equipped with the attitude necessary to undertake innovative activity;			X
(5) Increase the opportunities for investors in innovative activity and talent engaged in innovative activity to personally meet and interact at cultural, art, entertainment, culinary, athletic, or visitor-oriented events without a business focus;			X
(6) Expand Hawaiʻi's capacity to attract and service international programs and activities that generate employment for Hawaiʻi's people;			X
(7) Enhance and promote Hawaiʻi's role as a center for international relations, trade, finance, services, technology, education, culture, and the arts;			X
(8) Accelerate research and development of new energy-related industries based on wind, solar, ocean, underground resources, and solid waste;			X
(9) Promote Hawaiʻi's geographic, environmental, social, and technological advantages to attract new or innovative economic activities into the State			X
(10) Provide public incentives and encourage private initiative to attract new or innovative industries that best support Hawaiʻi's social, economic, physical, and environmental objectives			X
(11) Increase research and the development of ocean-related economic activities such as mining, food production, and scientific research;			X
(12) Develop, promote, and support research and educational and training programs that will enhance Hawaiʻi's ability to attract and develop economic activities of benefit to Hawaiʻi			X
(13) Foster a broader public recognition and understanding of the potential benefits of new or innovative growth-oriented industry in Hawaiʻi;			X
(14) Encourage the development and implementation of joint federal and State initiatives to attract federal programs and projects that will support Hawaiʻi's social, economic, physical, and environmental objectives			X
(15) Increase research and development of businesses and services in the telecommunications and information industries.			X

Table K-1: Hawaiʻi State Plan, Hawaiʻi Revised Statutes, Chapter 226 S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
(16) Foster the research and development of non-fossil fuel and energy efficient modes of transportation;			X
(17) Recognize and promote health care and health care information technology as growth industries.			X
Section 226-10.5 Objectives and Policies for the Economy - Information Industry.			
(A) Planning for the State's economy with regard to telecommunications and information technology shall be directed toward recognizing that broadband and wireless communication capability and infrastructure are foundations for an innovative economy and positioning Hawaiʻi as a leader in broadband and wireless communications and applications in the Pacific Region.			
(B) To achieve the information industry objective, it shall be the policy of this State to:			
(1) Promote efforts to attain the highest speeds of electronic and wireless communication within Hawaiʻi and between Hawaiʻi and the world, and make high speed communication available to all residents and businesses in Hawaiʻi			X
(2) Encourage the continued development and expansion of the telecommunications infrastructure serving Hawaiʻi to accommodate future growth and innovation in Hawaiʻi's economy			X
(3) Facilitate the development of new or innovative business and service ventures in the information industry which will provide employment opportunities for the people of Hawaiʻi;			X
(4) Encourage mainland- and foreign-based companies of all sizes, whether information technology-focused or not, to allow their principals, employees, or contractors to live in and work from Hawaiʻi, using technology to communicate with their headquarters, offices, or customers located out-of-State			X
(5) Encourage greater cooperation between the public and private sectors in developing and maintaining a well-designed information industry;			X
(6) Ensure that the development of new businesses and services in the industry are in keeping with the social, economic, and physical needs and aspirations of Hawaiʻi's people			X
(7) Provide opportunities for Hawaiʻi's people to obtain job training and education that will allow for upward mobility within the information industry;			X
(8) Foster a recognition of the contribution of the information industry to Hawaiʻi's economy; and			X
(9) Assist in the promotion of Hawaiʻi as a broker, creator, and processor of information in the Pacific.			X
Section 226-11 Objectives and Policies for the Physical Environment - Land-based, Shoreline, and Marine Resources.			
(A) Planning for the State's physical environment with regard to land-based, shoreline and marine resources shall be directed towards achievement of the following objectives:			
(1) Prudent use of Hawaiʻi's land-based, shoreline, and marine resources.	X		
(2) Effective protection of Hawaiʻi's unique and fragile environmental resources.	X		
(B) To achieve the land-based, shoreline, and marine resources objectives, it shall be the policy of this State to:			

Table K-1: Hawaiʻi State Plan, Hawaiʻi Revised Statutes, Chapter 226 S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
(1) Exercise an overall conservation ethic in the use of Hawaiʻi's natural resources.	X		
(2) Ensure compatibility between land-based and water-based activities and natural resources and ecological systems.	X		
(3) Take into account the physical attributes of areas when planning and designing activities and facilities.			X
(4) Manage natural resources and environs to encourage their beneficial and multiple uses without generating costly or irreparable environmental damage.	X		
(5) Consider multiple uses in watershed areas, provided such uses do not detrimentally affect water quality and recharge functions.	X		
(6) Encourage the protection of rare or endangered plant and animal species and habitats native to Hawaiʻi.	X		
(7) Provide public incentives that encourage private actions to protect significant natural resources from degradation or unnecessary depletion.			X
(8) Pursue compatible relationships among activities, facilities and natural resources.	X		
(9) Promote increased accessibility and prudent use of inland and shoreline areas for public recreational, educational and scientific purposes.	X		
Section 226-12 Objective and Policies for the Physical Environment - Scenic, Natural Beauty, and Historic Resources.			
(A) Planning for the State's physical environment shall be directed towards achievement of the objective of enhancement of Hawaiʻi's scenic assets, natural beauty, and multi-cultural/historical resources.			
(B) To achieve the scenic, natural beauty, and historic resources objective, it shall be the policy of this State to:			
(1) Promote the preservation and restoration of significant natural and historic resources.	X		
(2) Provide incentives to maintain and enhance historic, cultural, and scenic amenities.			X
(3) Promote the preservation of views and vistas to enhance the visual and aesthetic enjoyment of mountains, ocean, scenic landscapes, and other natural features.	X		
(4) Protect those special areas, structures, and elements that are an integral and functional part of Hawaiʻi's ethnic and cultural heritage.	X		
(5) Encourage the design of developments and activities that complement the natural beauty of the islands.			X
Section 226-13 Objectives and Policies for the Physical Environment - Land, Air, and Water Quality.			
(A) Planning for the State's physical environment with regard to land, air, and water quality shall be directed towards achievement of the following objectives:			
(1) Maintenance and pursuit of improved quality in Hawaiʻi's land, air, and water resources.	X		
(2) Greater public awareness and appreciation of Hawaiʻi's environmental resources.			X
(B) To achieve the land, air, and water quality objectives, it shall be the policy of this State to:			
(1) Foster educational activities that promote a better understanding of Hawaiʻi's limited environmental resources.			X

Table K-1: Hawaiʻi State Plan, Hawaiʻi Revised Statutes, Chapter 226 S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
(2) Promote the proper management of Hawaiʻi's land and water resources.	X		
(3) Promote effective measures to achieve desired quality in Hawaiʻi's surface, ground and coastal waters.	X		
(4) Encourage actions to maintain or improve aural and air quality levels to enhance the health and well-being of Hawaiʻi's people.	X		
(5) Reduce the threat to life and property from erosion, flooding, tsunamis, hurricanes, earthquakes, volcanic eruptions, and other natural or man-induced hazards and disasters.	X		
(6) Encourage design and construction practices that enhance the physical qualities of Hawaiʻi's communities.			X
(7) Encourage urban developments in close proximity to existing services and facilities.			X
(8) Foster recognition of the importance and value of the land, air, and water resources to Hawaiʻi's people, their cultures and visitors.			X
Section 226-14 Objective and Policies for Facility Systems - In General.			
(A) Planning for the State's facility systems in general shall be directed towards achievement of the objective of water, transportation, waste disposal, and energy and telecommunication systems that support statewide social, economic, and physical objectives.			
(B) To achieve the general facility systems objective, it shall be the policy of this State to:			
(1) Accommodate the needs of Hawaiʻi's people through coordination of facility systems and capital improvement priorities in consonance with State and county plans.	X		
(2) Encourage flexibility in the design and development of facility systems to promote prudent use of resources and accommodate changing public demands and priorities.	X		
(3) Ensure that required facility systems can be supported within resource capacities and at reasonable cost to the user.	X		
(4) Pursue alternative methods of financing programs and projects and cost-saving techniques in the planning, construction, and maintenance of facility systems.	X		
226-15 Objectives and Policies for Facility Systems - Solid and Liquid Wastes.			
(A) Planning for the State's facility systems with regard to solid and liquid wastes shall be directed towards the achievement of the following objectives:			
(1) Maintenance of basic public health and sanitation standards relating to treatment and disposal of solid and liquid wastes.			X
(2) Provision of adequate sewerage facilities for physical and economic activities that alleviate problems in housing, employment, mobility, and other areas.			X
(B) To achieve solid and liquid waste objectives, it shall be the policy of this State to			
(1) Encourage the adequate development of sewerage facilities that complement planned growth.			X
(2) Promote re-use and recycling to reduce solid and liquid wastes and employ a conservation ethic.			X

Table K-1: Hawaiʻi State Plan, Hawaiʻi Revised Statutes, Chapter 226 S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
(3) Promote research to develop more efficient and economical treatment and disposal of solid and liquid wastes.			X
226-16 Objective and Policies for Facility Systems - Water.			
(A) Planning for the State's facility systems with regard to water shall be directed towards achievement of the objective of the provision of water to adequately accommodate domestic, agricultural, commercial, industrial, recreational, and other needs within resource capacities.			
(B) To achieve the facility systems water objective, it shall be the policy of this State to:			
(1) Coordinate development of land use activities with existing and potential water supply.			X
(2) Support research and development of alternative methods to meet future water requirements well in advance of anticipated needs.			X
(3) Reclaim and encourage the productive use of runoff water and wastewater discharges.			X
(4) Assist in improving the quality, efficiency, service, and storage capabilities of water systems for domestic and agricultural use.			X
(5) Support water supply services to areas experiencing critical water problems.			X
(6) Promote water conservation programs and practices in government, private industry, and the general public to help ensure adequate water to meet long-term needs.			X
226-17 Objectives and Policies for Facility Systems - Transportation.			
(A) Planning for the State's facility systems with regard to transportation shall be directed towards the achievement of the following objectives:			
(1) An integrated multi-modal transportation system that services statewide needs and promotes the efficient, economical, safe, and convenient movement of people and goods.			X
(2) A statewide transportation system that is consistent with and will accommodate planned growth objectives throughout the State.			X
(B) To achieve the transportation objectives, it shall be the policy of this State to:			
(1) Design, program, and develop a multi-modal system in conformance with desired growth and physical development as stated in this chapter;			X
(2) Coordinate State, county, federal, and private transportation activities and programs toward the achievement of statewide objectives;			X
(3) Encourage a reasonable distribution of financial responsibilities for transportation among participating governmental and private parties;			X
(4) Provide for improved accessibility to shipping, docking, and storage facilities;			X
(5) Promote a reasonable level and variety of mass transportation services that adequately meet statewide and community needs;			X
(6) Encourage transportation systems that serve to accommodate present and future development needs of communities;			X
(7) Encourage a variety of carriers to offer increased opportunities and advantages to inter-island movement of people and goods;			X

Table K-1: Hawaiʻi State Plan, Hawaiʻi Revised Statutes, Chapter 226 S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
(8) Increase the capacities of airport and harbor systems and support facilities to effectively accommodate transshipment and storage needs;			X
(9) Encourage the development of transportation systems and programs which would assist statewide economic growth and diversification;			X
(10) Encourage the design and development of transportation systems sensitive to the needs of affected communities and the quality of Hawaiʻi's natural environment;			X
(11) Encourage safe and convenient use of low-cost, energy-efficient, non-polluting means of transportation;			X
(12) Coordinate intergovernmental land use and transportation planning activities to ensure the timely delivery of supporting transportation infrastructure in order to accommodate planned growth objectives; and			X
(13) Encourage diversification of transportation modes and infrastructure to promote alternate fuels and energy efficiency.			X
226-18 Objectives and Policies for Facility Systems - Energy.			
(A) Planning for the State's facility systems with regard to energy shall be directed toward the achievement of the following objectives, giving due consideration to all:			
(1) Dependable, efficient, and economical statewide energy systems capable of supporting the needs of the people;			X
(2) Increased energy security and self-sufficiency through the reduction and ultimate elimination of Hawaiʻi's dependence on imported fuels for electrical generation and ground transportation;			X
(3) Greater diversification of energy generation in the face of threats to Hawaiʻi's energy supplies and systems;			X
(4) Reduction, avoidance, or sequestration of greenhouse gas emissions from energy supply and use; and			X
(5) Utility models that make the social and financial interests of Hawaiʻi's utility customers a priority.			X
(B) To achieve the energy objectives, it shall be the policy of this State to ensure the provision of adequate, reasonably priced, and dependable energy services to accommodate demand.			
(C) To further achieve the energy objectives, it shall be the policy of this State to:			
(1) Support research and development as well as promote the use of renewable energy sources;			X
(2) Ensure that the combination of energy supplies and energy-saving systems is sufficient to support the demands of growth;			X
(3) Base decisions of least-cost supply-side and demand-side energy resource options on a comparison of their total costs and benefits when a least-cost is determined by a reasonably comprehensive, quantitative, and qualitative accounting of their long-term, direct and indirect economic, environmental, social, cultural, and public health costs and benefits;			X

Table K-1: Hawaiʻi State Plan, Hawaiʻi Revised Statutes, Chapter 226 S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
(4) Promote all cost-effective conservation of power and fuel supplies through measures including: (A) Development of cost-effective demand-side management programs; (B) Education; (C) Adoption of energy-efficient practices and technologies; and (D) Increasing energy efficiency and decreasing energy use in public infrastructure;			X
(5) Ensure to the extent that new supply-side resources are needed, the development or expansion of energy systems utilizes the least-cost energy supply option and maximizes efficient technologies;			X
(6) Support research, development, and demonstration of energy efficiency, load management, and other demand-side management programs, practices, and technologies;			X
(7) Promote alternate fuels and energy efficiency by encouraging diversification of transportation modes and infrastructure;			X
(8) Support actions that reduce, avoid, or sequester greenhouse gases in utility, transportation, and industrial sector applications; and			X
(9) Support actions that reduce, avoid, or sequester Hawaiʻi's greenhouse gas emissions through agriculture and forestry initiatives.			X
(10) Provide priority handling and processing for all State and county permits required for renewable energy projects;			X
(11) Ensure that liquefied natural gas is used only as a cost-effective transitional, limited-term replacement of petroleum for electricity generation and does not impede the development and use of other cost-effective renewable energy sources; and			X
(12) Promote the development of indigenous geothermal energy resources that are located on public trust land as an affordable and reliable source of firm power for Hawaiʻi.			X
226-18.5 Objectives and Policies for Facility Systems - Telecommunications.			
(A) Planning for the State's telecommunications facility systems shall be directed towards the achievement of dependable, efficient, and economical statewide telecommunications systems capable of supporting the needs of the people.			
(B) To achieve the telecommunications objective, it shall be the policy of this State to ensure the provision of adequate, reasonably priced, and dependable telecommunications services to accommodate demand.			
(C) To further achieve the telecommunications objective, it shall be the policy of this State to:			
(1) Facilitate research and development of telecommunications systems and resources;			X
(2) Encourage public and private sector efforts to develop means for adequate, ongoing telecommunications planning;			X
(3) Promote efficient management and use of existing telecommunications systems and services; and			X
(4) Facilitate the development of education and training of telecommunications personnel.			X
226-19 Objectives and Policies for Socio-Cultural Advancement - Housing.			
(A) Planning for the State's socio-cultural advancement with regard to housing shall be directed toward the achievement of the following objectives:			
(1) Greater opportunities for Hawaiʻi's people to secure reasonably priced, safe, sanitary, and livable homes, located in suitable environments that satisfactorily accommodate the needs			X

Table K-1: Hawaiʻi State Plan, Hawaiʻi Revised Statutes, Chapter 226 S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
and desires of families and individuals, through collaboration and cooperation between government and nonprofit and for-profit developers to ensure that more affordable housing is made available to very low-, low- and moderate-income segments of Hawaiʻi's population.			
(2) The orderly development of residential areas sensitive to community needs and other land uses.			X
(3) The development and provision of affordable rental housing by the State to meet the housing needs of Hawaiʻi's people.			X
(B) To achieve the housing objectives, it shall be the policy of this State to			
(1) Effectively accommodate the housing needs of Hawaiʻi's people.			X
(2) Stimulate and promote feasible approaches that increase housing choices for low-income, moderate-income, and gap-group households.			X
(3) Increase homeownership and rental opportunities and choices in terms of quality, location, cost, densities, style, and size of housing.			X
(4) Promote appropriate improvement, rehabilitation, and maintenance of existing housing units and residential areas.			X
(5) Promote design and location of housing developments taking into account the physical setting, accessibility to public facilities and services, and other concerns of existing communities and surrounding areas.			X
(6) Facilitate the use of available vacant, developable, and underutilized urban lands for housing.			X
(7) Foster a variety of lifestyles traditional to Hawaiʻi through the design and maintenance of neighborhoods that reflect the culture and values of the community.			X
(8) Promote research and development of methods to reduce the cost of housing construction in Hawaiʻi.			X
226-20 Objectives and Policies for Socio-Cultural Advancement - Health. (A) Planning for the State's socio-cultural advancement with regard to health shall be directed towards achievement of the following objectives:			
(1) Fulfillment of basic individual health needs of the general public.			X
(2) Maintenance of sanitary and environmentally healthful conditions in Hawaiʻi's communities.			X
(B) To achieve the health objectives, it shall be the policy of this State to:			
(1) Provide adequate and accessible services and facilities for prevention and treatment of physical and mental health problems, including substance abuse.			X
(2) Encourage improved cooperation among public and private sectors in the provision of health care to accommodate the total health needs of individuals throughout the State.			X
(3) Encourage public and private efforts to develop and promote statewide and local strategies to reduce health care and related insurance costs.			X

Table K-1: Hawaiʻi State Plan, Hawaiʻi Revised Statutes, Chapter 226 S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
(4) Foster an awareness of the need for personal health maintenance and preventive health care through education and other measures.			X
(5) Provide programs, services, and activities that ensure environmentally healthful and sanitary conditions.			X
(6) Improve the State's capabilities in preventing contamination by pesticides and other potentially hazardous substances through increased coordination, education, monitoring, and enforcement.			X
(7) Prioritize programs, services, interventions, and activities that address identified social determinants of health to improve native Hawaiian health and well-being consistent with the United States Congress' declaration of policy as codified in title 42 United States Code section 11702, and to reduce health disparities of disproportionately affected demographics, including native Hawaiians, other Pacific Islanders, and Filipinos. The prioritization of affected demographic groups other than native Hawaiians may be reviewed every ten years and revised based on the best available epidemiological and public health data.			X
226-21 Objective and Policies for Socio-Cultural Advancement - Education. (A) Planning for the State's socio-cultural advancement with regard to education shall be directed towards achievement of the objective of the provision of a variety of educational opportunities to enable individuals to fulfill their needs, responsibilities, and aspirations. (B) To achieve the education objective, it shall be the policy of this State to:			
(1) Support educational programs and activities that enhance personal development, physical fitness, recreation, and cultural pursuits of all groups.			X
(2) Ensure the provision of adequate and accessible educational services and facilities that are designed to meet individual and community needs.			X
(3) Provide appropriate educational opportunities for groups with special needs.			X
(4) Promote educational programs which enhance understanding of Hawaiʻi's cultural heritage.			X
(5) Provide higher educational opportunities that enable Hawaiʻi's people to adapt to changing employment demands.			X
(6) Assist individuals, especially those experiencing critical employment problems or barriers, or undergoing employment transitions, by providing appropriate employment training programs and other related educational opportunities.			X
(7) Promote programs and activities that facilitate the acquisition of basic skills, such as reading, writing, computing, listening, speaking, and reasoning.			X
(8) Emphasize quality educational programs in Hawaiʻi's institutions to promote academic excellence.			X
(9) Support research programs and activities that enhance the education programs of the State.			X
226-22 Objective and Policies for Socio-Cultural Advancement - Social Services.			

Table K-1: Hawaiʻi State Plan, Hawaiʻi Revised Statutes, Chapter 226 S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
(A) Planning for the State's socio-cultural advancement with regard to social services shall be directed towards the achievement of the objective of improved public and private social services and activities that enable individuals, families, and groups to become more self-reliant and confident to improve their well-being. (B) To achieve the social service objective, it shall be the policy of the State to:			
(1) Assist individuals, especially those in need of attaining a minimally adequate standard of living and those confronted by social and economic hardship conditions, through social services and activities within the State's fiscal capacities.			X
(2) Promote coordination and integrative approaches among public and private agencies and programs to jointly address social problems that will enable individuals, families, and groups to deal effectively with social problems and to enhance their participation in society.			X
(3) Facilitate the adjustment of new residents, especially recently arrived immigrants, into Hawaiʻi's communities.			X
(4) Promote alternatives to institutional care in the provision of long-term care for elder and disabled populations.			X
(5) Support public and private efforts to prevent domestic abuse and child molestation, and assist victims of abuse and neglect.			X
(6) Promote programs which assist people in need of family planning services to enable them to meet their needs.			X
226-23 Objective and Policies for Socio-Cultural Advancement - Leisure. (A) Planning for the State's socio-cultural advancement with regard to leisure shall be directed towards the achievement of the objective of the adequate provision of resources to accommodate diverse cultural, artistic, and recreational needs for present and future generations. (B) To achieve the leisure objective, it shall be the policy of this State to:			
(1) Foster and preserve Hawaiʻi's multi-cultural heritage through supportive cultural, artistic, recreational, and humanities-oriented programs and activities.			X
(2) Provide a wide range of activities and facilities to fulfill the cultural, artistic, and recreational needs of all diverse and special groups effectively and efficiently.			X
(3) Enhance the enjoyment of recreational experiences through safety and security measures, educational opportunities, and improved facility design and maintenance.			X
(4) Promote the recreational and educational potential of natural resources having scenic, open space, cultural, historical, geological, or biological values while ensuring that their inherent values are preserved.			X
(5) Ensure opportunities for everyone to use and enjoy Hawaiʻi's recreational resources.			X
(6) Assure the availability of sufficient resources to provide for future cultural, artistic, and recreational needs.			X
(7) Provide adequate and accessible physical fitness programs to promote the physical and mental well-being of Hawaiʻi's people.			X
(8) Increase opportunities for appreciation and participation in the creative arts, including the literary, theatrical, visual, musical, folk, and traditional art forms.			X

Table K-1: Hawaiʻi State Plan, Hawaiʻi Revised Statutes, Chapter 226 S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
(9) Encourage the development of creative expression in the artistic disciplines to enable all segments of Hawaiʻi's population to participate in the creative arts.			X
(10) Assure adequate access to significant natural and cultural resources in public ownership.			X
226-24 Objective and Policies for Socio-Cultural Advancement - Individual Rights and Personal Well-Being.			
(A) Planning for the State's socio-cultural advancement with regard to individual rights and personal well-being shall be directed towards achievement of the objective of increased opportunities and protection of individual rights to enable individuals to fulfill their socio-economic needs and aspirations.			
(B) To achieve the individual rights and personal well- being objective, it shall be the policy of this State to:			
(1) Provide effective services and activities that protect individuals from criminal acts and unfair practices and that alleviate the consequences of criminal acts in order to foster a safe and secure environment.			X
(2) Uphold and protect the national and State constitutional rights of every individual.			X
(3) Assure access to, and availability of, legal assistance, consumer protection, and other public services which strive to attain social justice.			X
(4) Ensure equal opportunities for individual participation in society.	X		X
226-25 Objective and Policies for Socio-Cultural Advancement - Culture.			
(A) Planning for the State's socio- cultural advancement with regard to culture shall be directed toward the achievement of the objective of enhancement of cultural identities, traditions, values, customs, and arts of Hawaiʻi's people.			
(B) To achieve the culture objective, it shall be the policy of this State to:			
(1) Foster increased knowledge and understanding of Hawaiʻi's ethnic and cultural heritages and the history of Hawaiʻi.	X		
(2) Support activities and conditions that promote cultural values, customs, and arts that enrich the lifestyles of Hawaiʻi's people and which are sensitive and responsive to family and community needs.	X		
(3) Encourage increased awareness of the effects of proposed public and private actions on the integrity and quality of cultural and community lifestyles in Hawaiʻi.	X		
(4) Encourage the essence of the aloha spirit in people's daily activities to promote harmonious relationships among Hawaiʻi's people and visitors.	X		
226-26 Objectives and Policies for Socio-Cultural Advancement - Public Safety.			
(A) Planning for the State's socio- cultural advancement with regard to public safety shall be directed towards the achievement of the following objectives:			
(1) Assurance of public safety and adequate protection of life and property for all people.	X		
(2) Optimum organizational readiness and capability in all phases of emergency management to maintain the strength, resources, and social and economic well-being of the community in the event of civil disruptions, wars, natural disasters, and other major disturbances.	X		
(3) Promotion of a sense of community responsibility for the welfare and safety of Hawaiʻi's people.			X
(B) To achieve the public safety objectives, it shall be the policy of this State to:			

Table K-1: Hawaiʻi State Plan, Hawaiʻi Revised Statutes, Chapter 226 S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
(1) Ensure that public safety programs are effective and responsive to community needs.			X
(2) Encourage increased community awareness and participation in public safety programs.			X
(C) To further achieve public safety objectives related to criminal justice, it shall be the policy of this State to:			
(1) Support criminal justice programs aimed at preventing and curtailing criminal activities.			X
(2) Develop a coordinated, systematic approach to criminal justice administration among all criminal justice agencies.			X
(3) Provide a range of correctional resources which may include facilities and alternatives to traditional incarceration in order to address the varied security needs of the community and successfully reintegrate offenders into the community.			X
(D) To further achieve public safety objectives related to emergency management, it shall be the policy of this State to:			
(1) Ensure that responsible organizations are in a proper state of readiness to respond to major war-related, natural, or technological disasters and civil disturbances at all times.	X		
(2) Enhance the coordination between emergency management programs throughout the State.	X		
226-27 Objectives and Policies for Socio-Cultural Advancement - Government. (A) Planning the State's socio-cultural advancement with regard to government shall be directed towards the achievement of the following objectives:			
(1) Efficient, effective, and responsive government services at all levels in the State.			X
(2) Fiscal integrity, responsibility, and efficiency in the State government and county governments.			X
(B) To achieve the government objectives, it shall be the policy of this State to:			
(1) Provide for necessary public goods and services not assumed by the private sector.			X
(2) Pursue an openness and responsiveness in government that permits the flow of public information, interaction, and response.			X
(3) Minimize the size of government to that necessary to be effective.			X
(4) Stimulate the responsibility in citizens to productively participate in government for a better Hawaiʻi.			X
(5) Assure that government attitudes, actions, and services are sensitive to community needs and concerns.			X
(6) Provide for a balanced fiscal budget.			X
(7) Improve the fiscal budgeting and management system of the State.			X
(8) Promote the consolidation of State and county governmental functions to increase the effective and efficient delivery of government programs and services and to eliminate duplicative services wherever feasible.			X

Table K-2: Hawai'i State Environmental Policy, Hawai'i Revised Statutes, Chapter 344-4 S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
(1) Population.			
(A) Recognize population impact as a major factor in environmental degradation and adopt guidelines to alleviate this impact and minimize future degradation;			X
(B) Recognize optimum population levels for counties and districts within the State, keeping in mind that these will change with technology and circumstance, and adopt guidelines to limit population to the levels determined.			X
(2) Land, water, mineral, visual, air, and other natural resources.			
(A) Encourage management practices which conserve and fully utilize all natural resources;	X		
(B) Promote irrigation and waste water management practices which conserve and fully utilize vital water resources;			X
(C) Promote the recycling of waste water;			X
(D) Encourage management practices which conserve and protect watersheds and water sources, forest, and open space areas;	X		
(E) Establish and maintain natural area preserves, wildlife preserves, forest reserves, marine preserves, and unique ecological preserves;			X
(F) Maintain an integrated system of state land use planning which coordinates the state and county general plans;			X
(G) Promote the optimal use of solid wastes through programs of waste prevention, energy resource recovery, and recycling so that all our wastes become utilized.			X
(3) Flora and fauna.			
(A) Protect endangered species of indigenous plants and animals and introduce new plants or animals only upon assurance of negligible ecological hazard;	X		
(B) Foster the planting of native as well as other trees, shrubs, and flowering plants compatible to the enhancement of our environment.			X
(4) Parks, recreation, and open space.			
(A) Establish, preserve and maintain scenic, historic, cultural, park and recreation areas, including the shorelines, for public recreational, educational, and scientific uses;	X		
(B) Protect the shorelines of the State from encroachment of artificial improvements, structures, and activities;			X
(C) Promote open space in view of its natural beauty not only as a natural resource but as an ennobling, living environment for its people.	X		
(5) Economic development.			
(A) Encourage industries in Hawaii which would be in harmony with our environment;			X
(B) Promote and foster the agricultural industry of the State; and preserve and conserve productive agricultural lands;			X
(C) Encourage federal activities in Hawaii to protect the environment;	X		

Table K-2: Hawai'i State Environmental Policy, Hawai'i Revised Statutes, Chapter 344-4 S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
(D) Encourage all industries including the fishing, aquaculture, oceanography, recreation, and forest products industries to protect the environment;			X
(E) Establish visitor destination areas with planning controls which shall include but not be limited to the number of rooms;			X
(F) Promote and foster the aquaculture industry of the State; and preserve and conserve productive aquacultural lands.			X
(6) Transportation.			
(A) Encourage transportation systems in harmony with the lifestyle of the people and environment of the State;			X
(B) Adopt guidelines to alleviate environmental degradation caused by motor vehicles;			X
(C) Encourage public and private vehicles and transportation systems to conserve energy, reduce pollution emission, including noise, and provide safe and convenient accommodations for their users.			X
(7) Energy.			
(A) Encourage the efficient use of energy resources.			X
(8) Community life and housing.			
(A) Foster lifestyles compatible with the environment; preserve the variety of lifestyles traditional to Hawaii through the design and maintenance of neighborhoods which reflect the culture and mores of the community;			X
(B) Develop communities which provide a sense of identity and social satisfaction in harmony with the environment and provide internal opportunities for shopping, employment, education, and recreation;			X
(C) Encourage the reduction of environmental pollution which may degrade a community;			X
(D) Foster safe, sanitary, and decent homes;			X
(E) Recognize community appearances as major economic and aesthetic assets of the counties and the State; encourage green belts, plantings, and landscape plans and designs in urban areas; and preserve and promote mountain-to-ocean vistas.			X
(9) Education and culture.			
(A) Foster culture and the arts and promote their linkage to the enhancement of the environment;			X
(B) Encourage both formal and informal environmental education to all age groups.			X
(10) Citizen participation.			
(A) Encourage all individuals in the State to adopt a moral ethic to respect the natural environment; to reduce waste and excessive consumption; and to fulfill the responsibility as trustees of the environment for the present and succeeding generations; and			X
(B) Provide for expanding citizen participation in the decision making process so it continually embraces more citizens and more issues.			X

Table K-3: Oʻahu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
PART I: POPULATION			
Objective A: To plan for anticipated population in a manner that acknowledges the limits of Oʻahu's natural resources, protects the environment, and minimizes social, cultural, and economic disruptions.			
Policy 1: Allocate efficiently the money and resources of the City in order to meet the needs of Oʻahu's current and future population.			X
Policy 2: Provide adequate support facilities to accommodate future numbers of visitors to Oʻahu while seeking to minimize disruption to residents and protect the natural environment.			X
Policy 3: Seek a balanced pace of physical development in harmony with the City's environmental, social, cultural, and economic goals by effecting and enforcing City regulations.			X
Policy 4: Establish geographic growth boundaries to accommodate future population growth while at the same time protecting valuable agricultural lands, environmental resources, and open space.			X
Policy 5: Support family planning and social equity.			X
Objective B: To establish a pattern of population distribution that will allow the people of Oʻahu to live, work and play in harmony.			
Policy 1: Facilitate the full development of the primary urban center through higher-density redevelopment and the provision of adequate infrastructure.			X
Policy 2: Encourage development within the secondary urban center at Kapolei and the ʻEwa and Central Oʻahu urban-fringe areas to relieve developmental pressures in the remaining urban-fringe and rural areas and to meet housing needs not readily provided in the primary urban center.			X
Policy 3: Manage land use and development in the urban-fringe and rural areas so that: a. Development is contained within growth boundaries; and b. Population densities in all areas remain consistent with the character, culture, and environmental qualities desired for each community.			X
Policy 4: Direct growth according to Policies 1, 2, and 3 above by providing development capacity and needed infrastructure to support a distribution of Oʻahu's resident population that is consistent with the following for the Primary Urban Center: 43% distribution of the 2040 Oʻahu population.			X
PART II: BALANCED ECONOMY			
Objective A: To promote diversified economic opportunities that enable all the people of Oʻahu to attain meaningful employment and a decent standard of living.			
Policy 1: Support a strong, diverse, and dynamic economic base that protects the natural environment and is resilient to changes in global conditions.			X
Policy 2: Encourage the viability of businesses and industries, including support for small businesses, which contribute to the economic and social well-being of Oʻahu residents.			X
Policy 3: Pursue opportunities to grow and strategically develop non-polluting industries such as healthcare, agriculture, renewable energy, and technology in appropriate locations			X

Table K-3: Oʻahu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
	that contribute to Oʻahu's long-term environmental, economic, and social sustainability.			
Policy 4:	Support entrepreneurship and innovation through creative efforts such as partnerships with businesses and non-profit organizations, and by encouraging complementary policies that support access to capital markets.			X
Policy 5:	Foster a healthy business climate by streamlining regulatory processes to be transparent, predictable, and efficient.			X
Policy 6:	Encourage the development of local, national, and world markets for the products of Oʻahu-based industries.			X
Policy 7:	Explore and encourage alternate economic models that reflect traditional cultural values and improve economic resilience, i.e., subsistence, barter and a culture of reciprocity and sharing.			X
Objective B:	To maintain a successful visitor industry that creates living wage employment, enhances quality of life, and actively supports our unique sense of place, natural beauty, Native Hawaiian culture, and multi-cultural heritage.			
Policy 1:	Encourage the visitor industry to support the quality of the visitor experience, the economic and social well-being of communities, the environment, and the quality of life of residents.			X
Policy 2:	Respect and emphasize the value that Native Hawaiian culture, its cultural practitioners, and other established ethnic traditions bring to enrich the visitor experience and appreciation for island heritage, culture, and values.			X
Policy 3:	Guide the development and operation of visitor accommodations and attractions in a manner that avoids unsustainable increases in the cost of providing public services and infrastructure, and that respects existing lifestyles, cultural practices, and natural, cultural, and historic resources.			X
Policy 4:	Partner with the private sector to support the long-term viability of Waikīkī as a world class visitor destination and as Oʻahu's primary resort area, and to support adequate adaptation strategies against climate change impacts.			X
Policy 5:	Provide related public expenditures for rural and urban-fringe areas that are highly impacted by the visitor industry.			X
Policy 6:	Provide for a high-quality, livable, and safe environment for visitors and residents in Waikīkī, and support measures to ensure visitors' and residents' safety in all areas of Oʻahu.			X
Policy 7:	Concentrate on the quality of the visitor experience in Waikīkī, rather than on development densities.			X
Policy 8:	Facilitate the development of the following secondary resort areas: Ko ʻOlina, Turtle Bay, Hoakalei, and Mākaha Valley in a manner that respects existing lifestyles and the natural environment.			X
Policy 9:	Preserve scenic qualities of Oʻahu for residents and visitors alike.			X

Table K-3: Oʻahu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
Policy 10: Encourage physical improvements, social services, and cultural programs that contribute to a high-quality visitor experience, while seeking financial support of these improvements from the visitor industry.			X
Objective C: To ensure the long-term viability, continued productivity, and sustainability of agriculture on Oʻahu.			
Policy 1: Foster a positive business climate for agricultural enterprises of all sizes, as well as innovative approaches to farming as a business, to ensure the continuation of agriculture as an important component of Oʻahu's economy.			X
Policy 2: Support agricultural diversification to strengthen the agricultural industry and make more locally grown food available for local consumption.			X
Policy 3: Foster market opportunities and increased consumer demand for safe, locally grown, fresh, processed, and value-added agricultural products.			X
Policy 4: Streamline the implementation of regulations to enhance a producer's ability to develop, market, and distribute locally grown food and products.			X
Policy 5: Identify the economic benefits of local food production for local markets. Provide economic incentives to encourage local food production and sustainability, and encourage agricultural and aquaculture occupations.			X
Policy 6: Promote small-scale farming activities and other operations, such as truck farming, flower growing, aquaculture, livestock production, taro growing, subsistence farms, and community gardens.			X
Policy 7: Encourage landowners to actively use agricultural lands for agricultural purposes, and to pursue the long-term preservation of agricultural land with high productivity potential for agricultural production.			X
Policy 8: Encourage sustainable agricultural production to coexist on lands with renewable energy generation.			X
Policy 9: Prohibit the urbanization of agricultural land located outside the City's growth boundaries.			X
Policy 10: Support and encourage technologies and agricultural practices that conserve and protect water, soil, air quality, and drainage areas, reduce carbon emissions, and promote public health and safety.			X
Policy 11: Support and encourage the availability and use of non-potable water for irrigation, where feasible.			X
Policy 12: Provide plans, incentives, and strategies to ensure the affordability of agricultural land for farmers.			X
Policy 13: Encourage both public and private investments to improve and expand agricultural infrastructure, such as irrigation systems, agricultural processing centers, and distribution networks.			X
Policy 14: Promote farming as a desirable and fulfilling occupation by encouraging agricultural education and training programs and by raising public awareness and appreciation for agriculture.			X

Table K-3: Oʻahu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
Policy 15: Protect the right to farm by enforcing right-to-farm laws, enacting policies to protect agricultural operations, and imposing meaningful buffer zones.			X
Policy 16: Seek ways to discourage agricultural theft and vandalism.			X
Policy 17: Recognize the scenic value of agricultural lands as an open-space resource and amenity.			X
Objective D: To use the economic resources of the sea in a sustainable manner.			
Policy 1: Encourage the fishing industry to maintain its viability at a level that does not degrade or damage marine ecosystems.			X
Policy 2: Encourage the ongoing development of aquaculture, ocean research, and other ocean-related industries.			X
Policy 3: Encourage the expansion of ocean recreation activities for residents and visitors that are operated in a sustainable manner.			X
Objective E: To ensure meaningful employment and economic equity.			
Policy 1: Support public and private training and employment programs to prepare residents for existing and future jobs, including those for historically marginalized communities.			X
Policy 2: Make full use of State and Federal employment and training programs.			X
Policy 3: Encourage the provision of retraining programs for workers in industries with planned reductions in their labor force.			X
Policy 4: Identify emerging industries, encourage investments needed to support the industries, and develop a skilled workforce in these fields			X
Objective F: To maintain federal programs and economic activity on Oʻahu consistent with the City's infrastructure and environmental goals.			
Policy 1: Take full advantage of Federal programs and grants which will contribute to the economic and social well-being of Oʻahu's residents.			X
Policy 2: Encourage the Federal government to pay for the cost of public services used by Federal agencies.			X
Policy 3: Encourage the Federal government to lease new facilities rather than construct them on tax exempt public land.			X
Policy 4: Encourage the military to purchase locally all needed services and supplies which are available on Oʻahu.			X
Policy 5: Encourage the continuation of a high level of military-related employment both on and off base in the Hickam-Pearl Harbor, Wahiawā, Kailua-Kāneʻohe, and ʻEwa areas.			X
Objective G: To bring about orderly economic growth on Oʻahu.			
Policy 1: Concentrate economic activity and government services in the primary urban center and in the secondary urban center at Kapolei.			X
Policy 2: Advance the equitable distribution of City capital spending, employment opportunities, infrastructure investments, and other benefits throughout communities based on need			X

Table K-3: Oʻahu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
	and regardless of income level. Allow infrastructure and business activity in urban fringe areas appropriate to population needs.			
Policy 3:	Maintain sufficient land in appropriately located commercial and industrial areas to help ensure a favorable business climate on Oʻahu.			X
Policy 4:	Encourage the continuation of a high level of military-related employment in the Hickam-Pearl Harbor, Wahiawa, Kailua-Kaneohe, and ʻEwa areas.			X
PART III: NATURAL ENVIRONMENT AND RESOURCE STEWARDSHIP				
Objective A:	To protect and preserve the natural environment.			
Policy 1:	Protect Oʻahu's natural environment, especially the shoreline, valleys, and ridges, from incompatible development.			X
Policy 2:	Seek the restoration of environmentally damaged areas and natural resources.			X
Policy 3:	Preserve, protect, and restore stream flows and stream habitats to support aquatic and environmental processes and riparian, scenic, recreational, and Native Hawaiian cultural resources.			X
Policy 4:	Require development projects to give due consideration to natural features and hazards such as slope, inland and coastal erosion, flood hazards, water-recharge areas, and existing vegetation, as well as to plan for coastal hazards that threaten life and property.			X
Policy 5:	Require sufficient setbacks from Oʻahu's shorelines to protect life and property, preserve natural shoreline areas and sandy beaches, and minimize the future need for protective structures or relocation of structures.			X
Policy 6:	Design and maintain surface drainage and flood-control systems in a manner which will help preserve natural and cultural resources.			X
Policy 7:	Protect the natural environment from damaging levels of air, water, and noise pollution.	X		
Policy 8:	Protect plants, birds, and other animals that are unique to the State of Hawaiʻi and the Island of Oʻahu.	X		
Policy 9:	Increase tree canopy and ensure its integration into new developments, and protect significant trees on public and private lands.			X
Policy 10:	Increase public awareness and appreciation of Oʻahu's land, air, and water resources.			X
Policy 11:	Support the State and federal governments in the protection of the unique environmental, marine, cultural and wildlife assets of the Northwestern Hawaiian Islands.			X
Policy 12:	Plan, prepare for, and mitigate the impacts of climate change on the natural environment, including strategies of adaptation.			X
Objective B:	To preserve and enhance the natural monuments and scenic views of Oʻahu for the benefit of both residents and visitors.			

Table K-3: Oʻahu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
Policy 1:	Protect the Island's well-known resources: its mountains and craters; forests and watershed areas; marshes, rivers, and streams; shoreline, fishponds, and bays; and reefs and offshore islands.			X
Policy 2:	Protect Oʻahu's scenic views, especially those seen from highly developed and heavily traveled areas.			X
Policy 3:	Locate roads, highways, and other public facilities and utilities in areas where they will least obstruct important views of the mountains and the sea.			X
Policy 4:	Protect and expand public access to the natural and coastal environment for recreational, educational, and cultural purposes, and maintain access in a way that does not damage natural, historic, or cultural resources.			X
PART IV: HOUSING				
Objective A:	To ensure a balanced mix of housing opportunities and choices for all residents at prices they can afford.			
Policy 1:	Support programs, policies, and strategies that will provide decent and affordable homes for local residents, especially those in the lowest income brackets			X
Policy 2:	Streamline approval and permit procedures, in a transparent manner, for housing and other development projects.			X
Policy 3:	Encourage innovative residential developments that result in lower costs, sustainable use of resources, more efficient use of land and infrastructure, greater convenience and privacy, and a distinct community identity.			X
Policy 4:	Support and encourage programs to maintain and improve the condition of existing housing.			X
Policy 5:	Make full use of government programs that provide assistance for low- and moderate-income renters and homebuyers.			X
Policy 6:	Maximize local funding programs available for affordable housing.			X
Policy 7:	Provide financial and other incentives to encourage the private sector to build homes for low- and moderate-income residents.			X
Policy 8:	Encourage and participate in joint public-private development of low- and moderate-income housing.			X
Policy 9:	Encourage the replacement of low- and moderate-income housing in areas which are being redeveloped at higher densities.			X
Policy 10:	Promote the design and construction of dwellings which take advantage of Oʻahu's year-round moderate climate and use other sustainable design techniques.			X
Policy 11:	Encourage the construction of affordable homes within established low-density and rural communities by such means as ʻohana units, duplex dwellings, and cluster development that embraces the ʻohana concept by maintaining multi-generational proximity for local families.			X

Table K-3: Oʻahu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
Policy 12: Promote higher-density, mixed-use development where appropriate, including rail transit-oriented development, to increase the supply of affordable and market housing in convenient proximity to jobs, schools, shops, and public transit.			X
Policy 13: Encourage the production and maintenance of affordable rental housing.			X
Policy 14: Encourage the provision of affordable housing designed for the elderly and people with disabilities in locations convenient to critical services and to public transit.			X
Policy 15: Encourage equitable relationships between landowners and leaseholders, between landlords and tenants, and between condominium developers and owners.			X
Policy 16: Support collaborative partnerships that work toward immediate solutions to house and service homeless populations and also toward long-term strategies to prevent and eliminate homelessness.			X
Policy 17: Support programs to address all facets of homelessness, so that every homeless person has a place to stay, along with the infrastructure and support services that are needed.			X
Objective B: To reduce speculation in land and housing.			
Policy 1: Encourage the State government to coordinate its urban-area designations with the developmental policies of the City and County.			X
Policy 2: Discourage speculation in lands outside of areas planned for urban use, reduce the prevalence of vacant dwelling units, and reduce the use of residential dwelling units for short-term vacation rentals.			X
Policy 3: Seek public benefits from increases in the value of land owing to City and State developmental policies and decisions.			X
Policy 4: Require government-subsidized housing to be delivered to appropriate purchasers and renters.			X
Policy 5: Ensure that owners of housing properties, including government-subsidized housing, maintain housing affordability over the long term.			X
Objective C: To provide residents with a choice of living environments that are reasonably close to employment, schools, recreation, and commercial centers, and that are adequately served by transportation networks and public utilities.			
Policy 1: Ensure that residential developments offer affordable housing to people of different income levels and to families of various sizes to alleviate the existing condition of overcrowding.			X
Policy 2: Encourage the fair distribution of low- and moderate-income housing throughout the Island.			X
Policy 3: Encourage the co-location of residential development and employment centers with commercial, educational, social, and recreational amenities in the development of desirable communities.			X

Table K-3: Oʻahu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
Policy 4:	Encourage residential development in suburban areas where existing roads, utilities, and other community facilities are not being used to capacity, and in urban areas where higher densities may be readily accommodated.			X
Policy 5:	Support mixed-use development and higher-density redevelopment in areas surrounding rail transit stations.			X
Policy 6:	Discourage residential development in areas where the topography makes construction difficult or hazardous, where sea level rise and flooding are a hazard, and where providing and maintaining roads, utilities, and other facilities would be extremely costly or environmentally damaging.			X
Policy 7:	Encourage public and private investments in older communities as needed to keep the communities vibrant and livable.			X
Policy 8:	Encourage the military to provide housing for active duty personnel and their families on military bases and in areas turned over to military housing contractors.			X
PART V: TRANSPORTATION AND UTILITIES				
Objective A:	To create a multi-modal transportation system that moves people and goods safely, efficiently, and at a reasonable cost and minimizes fossil fuel consumption and greenhouse gas emissions; serves all users, including limited income, elderly, and disabled populations; and is integrated with existing and planned development.			
Policy 1:	Develop a comprehensive, well-connected and integrated ground transportation system that reduces carbon emissions and enables safe, comfortable and convenient travel for all users, including motorists, pedestrians, bicyclists, and public transportation users of all ages and abilities.			X
Policy 2:	Provide multi-modal transportation services to people living within the ʻEwa, Central Oʻahu, and Pearl City-Hawaiʻi Kai corridors primarily through a mass transit system including exclusive right-of-way rail transit and feeder-bus components as well as through the existing highway system.			X
Policy 3:	Provide transportation services outside the ʻEwa, Central Oʻahu, and Pearl City-Hawaiʻi Kai corridors primarily through a system of express- and feeder-buses as well as through the highway system with limited to moderate improvements sufficient to meet the needs of the communities being served.			X
Policy 4:	Work with the State to ensure adequate and safe access for communities served by Oʻahu's coastal highway system, and to plan for the relocation of highways and roads subject to sea level rise away from coastlines.			X
Policy 5:	Support the rail transit system as the transportation spine for the urban core, with links to the airport and maritime terminals, which will work together with other alternative modes of transit and transit-oriented development to reduce automobile dependency and increase multi-modal travel.			X
Policy 6:	Support the development of transportation plans, programs, and facilities that are based on Complete Streets features. Maintain and improve road, bicycle, pedestrian, and micro mobility facilities in existing communities to eliminate unsafe conditions.			X
Policy 7:	Design street networks to incorporate greater roadway and pathway connectivity.			X

Table K-3: Oʻahu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
Policy 8:	Make available transportation services to people with limited mobility: the young, the elderly, the handicapped, and the poor.			X
Policy 9:	Consider environmental, social, cultural, and climate change and natural hazard impacts, as well as construction and operating costs, as important factors in planning transportation system improvements.			X
Policy 10:	Reduce traffic congestion and maximize the efficient use of transportation resources by pursuing transportation demand management strategies such as carpooling, telecommuting, flexible work schedules, and incentives to use alternative travel modes.			X
Policy 11:	Enhance pedestrian-friendly and bicycle-friendly travel via public and private programs and improvements.			X
Policy 12:	Maintain separate aviation facilities for general aviation operations to supplement the capacity of the Daniel K. Inouye International Airport.			X
Policy 13:	Support improvements to Kalaeloa Barbers Point Harbor as Oʻahu's second deep-water harbor.			X
Policy 14:	Support the operation, maintenance and improvement of Honolulu Harbor as Oʻahu's primary cargo and ocean transportation hub.			X
Policy 15:	Advance the transition to electric and alternative fuel infrastructure to provide adequate and accessible charging spaces and renewal fueling stations for ground transportation on Oʻahu.			X
Objective B:	Provide an adequate supply of water and environmentally sound systems of waste disposal for Oʻahu's existing population and for future generations, and support a one water approach that uses and manages freshwater, wastewater, and stormwater resources in an integrated manner.			
Policy 1:	Develop and maintain an adequate, safe, and reliable supply of fresh water in a cost-effective way that supports the long-term sustainability of the resource and considers the impacts of climate change.			X
Policy 2:	Help to develop and maintain an adequate, safe, and reliable supply of water for agricultural and industrial needs in a resource-integrated and cost-effective way that supports the long-term health of the resource.			X
Policy 3:	Use technologies that provide water, waste disposal, and recycling services at a reasonable cost and in a manner that addresses environmental and community impacts.			X
Policy 4:	Encourage the increased availability and use of recycled or brackish water to meet nonpotable demands.			X
Policy 5:	Pursue strategies and programs to reduce the per capita consumption of water and the per capita production of waste.			X
Policy 6:	Provide safe, reliable, efficient, and environmentally sound waste-collection, waste disposal, and recycling services that consider the near- and long-term impacts of climate change during the siting and construction of new facilities.			X

Table K-3: Oʻahu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
Policy 7: Pursue programs to expand on-island recycling and resource recovery from Oʻahu's solid waste and wastewater streams.			X
Policy 8: Support initiatives that educate the community about the importance of conserving resources and reducing waste streams through reduction, reuse, and recycling.			X
Policy 9: Require the safe use and disposal of hazardous materials.			X
Objective C: To ensure reliable, cost-effective, and responsive service for all utilities with equitable access for residents.			
Policy 1: Maintain and upgrade utility systems in order to avoid major breakdowns and service interruptions.			X
Policy 2: Provide improvements to utilities in existing neighborhoods to reduce substandard conditions, and increase resilience to use fluctuations, natural hazards, extreme weather, and other climate impacts.			X
Policy 3: Facilitate timely and orderly upgrades and expansions of utility systems.			X
Policy 4: Increase the efficiency of public-serving utilities by encouraging a mixture of uses with peak periods of demand aligning with the availability of resources.			X
Objective D: To maintain transportation and utility systems which will help Oʻahu continue to be a desirable place to live and visit.			
Policy 1: Provide adequate resources to ensure the maintenance and improvement of transportation systems and utilities.			X
Policy 2: Evaluate the social, cultural, economic, and environmental impact of additions to the transportation and utility systems before they are constructed.			X
Policy 3: Require the installation of underground utility lines wherever feasible.			X
Policy 4: Seek improved taxing powers for the City in order to provide a more equitable means of financing transportation and utility services.			X
Policy 5: Evaluate impacts of sea level rise on existing public infrastructure, especially sewage treatment plants, roads, and other public and private utilities located along or near Oʻahu's coastal areas, and avoid the placement of future public infrastructure in threatened areas.			X
PART VI: ENERGY			
Objective A: To increase energy self-sufficiency through renewable energy and maintain an efficient, reliable, resilient, and cost-efficient energy system.			
Policy 1: Encourage the implementation of a comprehensive plan to guide and coordinate energy conservation and renewable energy development and utilization programs.			X
Policy 2: Support and encourage programs and projects, including economic incentives, regulatory measures, and educational efforts, and seek to eliminate Oʻahu's dependence on fossil fuels.			X
Policy 3: Ensure access to an adequate reserve of fuel and energy supplies to aid disaster response and recovery.			X

Table K-3: Oʻahu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
Policy 4: Support the increased use of solid waste energy recovery and other biomass energy conversion systems.			X
Policy 5: Support and participate in research, development, demonstration, commercialization, and optimization programs aimed at developing cost-effective and environmentally sound renewable energy supplies.			X
Policy 6: Support State and federal initiatives to utilize renewable energy sources.			X
Policy 7: Manage resources and development of communities in line with long-term efficiency and sustainability goals and targets in the areas of energy, carbon emissions, waste streams, all utilities, and food security.			X
Policy 8: Encourage and equitably incentivize the use of commercially available renewable energy systems in public facilities, institutions, residences, and business developments.			X
Policy 9: Consider health, safety, environmental, cultural, and aesthetic impacts, as well as resource limitations, land use patterns, and relative costs in all major decisions on renewable energy.			X
Policy 10: Work closely with the State and federal governments in the formulation and implementation of all City energy-related programs and regulations, including updating building energy codes.			X
Objective B: To conserve energy through the more efficient management of its use and through more energy-efficient technologies.			
Policy 1: Ensure that the efficient use of energy is a primary factor in the preparation and administration of land use plans and regulations.			X
Policy 2: Provide incentives and, where appropriate, mandatory controls to achieve energy efficient and sustainable siting and design of new developments. Support the increased use of nationally recognized energy efficiency and resource conservation rating and certification systems.			X
Policy 3: Provide incentives and, where appropriate, mandatory controls to reduce energy consumption in existing buildings and outdoor facilities, and in design and construction practices.			X
Policy 4: Promote the development of a multi-modal transportation system that minimizes and seeks to eliminate fossil fuel consumption and greenhouse gas emissions.			X
Policy 5: Encourage the implementation of an adaptable and reliable electrical grid, energy transmission, energy storage, microgrids, and energy generation technologies.			X
Policy 6: Support the availability and use of energy efficient vehicles, especially hybrid, fuel cell, and pure electrical vehicles.			X
Objective C: To foster an ethic of energy conservation that inspires residents to engage in sustainable practices.			
Policy 1: Provide citizens with the information they need to fully understand severe climate change, supply chain issues, costs, security, and other issues associated with Oʻahu's dependence on imported fossil fuels.			X

Table K-3: Oʻahu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
Policy 2:	Increase consumer awareness of available renewable energy sources and their costs and benefits.			X
Policy 3:	Provide information concerning the impact of public and private decisions on future energy generation, transmission, storage, and use.			X
Policy 4:	Provide communities with timely, relevant, and accurate information concerning renewable energy facilities proposed in their area, and ensure adequate buffer zones required for health or safety.			X
PART VII: PHYSICAL DEVELOPMENT AND URBAN DESIGN				
Objective A:	To coordinate changes in the physical environment of Oʻahu to ensure that all new developments are timely, well-designed, and appropriate for the areas in which they will be located.			
Policy 1:	Provide infrastructure improvements to serve new growth areas, redevelopment areas, and areas with badly deteriorating infrastructure.			X
Policy 2:	Coordinate the location and timing of new development with the availability of adequate water supply, sewage treatment, drainage, transportation, and other public facilities and services.			X
Policy 3:	Require new developments to provide or pay the cost of all essential community services, including roads, utilities, schools, parks, and emergency facilities that are intended to directly serve the development.			X
Policy 4:	Facilitate and encourage compact, higher-density development in urban areas designated for such uses.			X
Policy 5:	Encourage the establishment of mixed-use town centers that are compatible with the physical and social character of their community.			X
Policy 6:	Facilitate transit-oriented development in rail transit station areas to create live/work/play multi-modal communities that reduce travel and traffic congestion.			X
Policy 7:	Encourage the clustering of development to reduce the cost of providing utilities and other public services.			X
Policy 8:	Locate new industries and new commercial areas so that they will be well-related to their markets and suppliers, and to residential areas and transportation facilities.			X
Policy 9:	Locate community facilities on sites that will be convenient to the people they are intended to serve.			X
Policy 10:	Discourage uses which are major sources of noise, air, and light pollution			X
Policy 11:	Implement siting and design solutions that seek to reduce exposure to natural hazards, including those related to climate change, flooding, and sea level rise.			X
Policy 12:	Prohibit new airfields, high-powered electromagnetic-radiation sources, and storage places for fuel and explosives from locating on sites where they will endanger or disrupt nearby communities.			X
Policy 13:	Promote opportunities for the community to participate meaningfully in planning and development processes, including new forms of communication and social media.			X

Table K-3: Oʻahu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
Objective B: To plan and prepare for the long-term physical impacts of climate change.			
Policy 1: Integrate climate change adaptation into the planning, design, and construction of all significant improvements to and development of the built environment.			X
Policy 2: Coordinate plans in the private and public sectors that support research, monitoring, and educational programs on climate change.			X
Policy 3: Prepare for the anticipated impacts of climate change and sea level rise on existing communities and facilities through mitigation, adaptation, managed retreat, or other measures in exposed areas.			X
Objective C: To develop the urban corridor stretching from Waiʻalae-Kāhala to Pearl City as the island's primary urban center.			
Policy 1: Provide downtown Honolulu and other major business centers with a well-balanced mixture of uses.			X
Policy 2: Encourage the development of attractive residential communities in downtown and other business centers.			X
Policy 3: Maintain and improve downtown as the financial and office center of the island, and as a major retail center.			X
Policy 4: Provide for the continued viability of the Hawaiʻi Capital District as a center of government activities and as an attractive park-like setting in the heart of the city.			X
Policy 5: Foster the development of Honolulu's waterfront as the State's major port and maritime center, as a people-oriented mixed-use area, and as a major recreation area with accommodation for sea level rise.			X
Objective D: To develop a secondary urban center in ʻEwa with its nucleus in the Kapolei area.			
Policy 1: Support public projects that are needed to facilitate development of the secondary urban center at Kapolei.			X
Policy 2: Encourage the development of a major residential, commercial, and employment center within the secondary urban center at Kapolei.			X
Policy 3: Encourage the continuing development of the area encompassing Campbell Industrial Park, Kalaeloa Barbers Point Harbor, and West Kapolei as a major industrial center.			X
Policy 4: Coordinate plans for the development of the secondary urban center at Kapolei with the State and federal governments, major landowners and developers, and the community.			X
Policy 5: Cooperate with the State and federal governments in the improvements to the deep water harbor at Kalaeloa Barbers Point.			X
Policy 6: Encourage the development of the Ocean Pointe/Hoakalei Communities as a major residential and recreation area emphasizing recreational activities and a waterfront commercial center containing light-industrial, commercial, and visitor accommodation uses.			X
Objective E: To maintain those development characteristics in the urban-fringe and rural areas which make them desirable places to live.			

Table K-3: Oʻahu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
Policy 1:	Develop and maintain urban-fringe areas as predominantly residential areas characterized by generally low rise, low density development which may include significant levels of retail and service commercial uses as well as satellite institutional and public uses geared to serving the needs of households.			X
Policy 2:	Coordinate plans for developments within the ʻEwa and Central Oʻahu urban-fringe areas with the State and Federal governments and with major landowners and developers, agricultural industries, and the community			X
Policy 3:	Maintain a "green belt" of open space and agricultural land around developed communities in the ʻEwa and Central Oʻahu areas of Oʻahu.			X
Policy 4:	Maintain rural areas that reflect an open and scenic setting, dominated by small to moderate size agricultural pursuits, with small towns of low-density and low-rise character, and which allows modest growth opportunities tailored to address area residents' future needs.			X
Policy 5:	Encourage the development of a variety of housing choices including affordable housing in rural communities, to give people the choice to continue to live in the community that they were raised in.			X
Policy 6:	Ensure the social and economic vitality of rural communities by supporting infill development and modest increases in heights and densities around existing rural town areas where feasible to maintain an adequate supply of housing for future generations.			X
Objective F: To create and maintain attractive, meaningful, and stimulating environments throughout Oʻahu.				
Policy 1:	Encourage distinctive community identities for both new and existing communities and neighborhoods.			X
Policy 2:	Require the consideration of urban design principles in all development projects.			X
Policy 3:	Require developments in stable, established communities and rural areas to be compatible with the existing communities and areas.			X
Policy 4:	Provide design guidelines and controls that will allow more compact development and intensive use of lands in the primary urban center and along the rail transit corridor.			X
Policy 5:	Seek to protect residents' quality of life and to maintain the integrity of neighborhoods by strengthening regulatory and enforcement strategies that address the presence of inappropriate non-residential activities.			X
Policy 6:	Promote public and private programs to beautify the urban and rural environments.			X
Policy 7:	Design public structures to meet high aesthetic and functional standards and to complement the physical character of the communities they will serve.			X
Policy 8:	Design public street networks to be safe and accessible for users of all ages and abilities, to accommodate multiple modes of travel to be visually attractive and to support sustainable ecological processes, such as stormwater infiltration.			X
Policy 9:	Recognize the importance of using Native Hawaiian plants in landscaping to further the traditional Hawaiian concept of mālama ʻāina and to create a more Hawaiian sense of place.			X

Table K-3: Oʻahu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
Objective G: To promote and enhance the social and physical character of Oʻahu's older towns and neighborhoods.			
Policy 1: Encourage new construction in established areas to be compatible with the character and cultural values of the surrounding community.			X
Policy 2: Encourage, wherever desirable, the rehabilitation of existing substandard structures.			X
Policy 3: Provide and maintain roads, public facilities, and utilities without damaging the character of older communities.			X
Policy 4: Seek the satisfactory relocation of residents before permitting their displacement by new development, redevelopment, or neighborhood rehabilitation.			X
Policy 5: Acknowledge the cultural and historical significance of kuleana lands, the ancestral ownership of kuleana lands, and promote policies that preserve and protect kuleana lands.			X
Policy 6: Support and encourage cohesive neighborhoods which foster interactions among neighbors, promote vibrant community life, and enhance livability.			X
PART VIII: PUBLIC SAFETY AND COMMUNITY RESILIENCE			
Objective A: To prevent and control crime and maintain public order.			
Policy 1: Provide a safe environment for residents and visitors on Oʻahu.			X
Policy 2: Provide adequate criminal justice facilities and staffing for City and County law-enforcement agencies.			X
Policy 3: Provide adequate training, staffing, and support for City public safety agencies.			X
Policy 4: Emphasize improvements to police and prosecution operations which will result in a higher proportion of wrongdoers who are arrested, convicted, and punished for their crimes.			X
Policy 5: Support policies and programs that expand access to treatment, rehabilitation, and reentry programs for adult and juvenile offenders.			X
Policy 6: Keep the public informed of the nature and extent of criminal activity on Oʻahu			X
Policy 7: Establish and maintain programs to encourage public cooperation in the prevention and solution of crimes, and promote strong community-police relationships.			X
Policy 8: Seek the help of State and federal law-enforcement agencies to curtail the activities of organized crime syndicates on Oʻahu.			X
Policy 9: Conduct periodic reviews of criminal laws to ensure their relevance to the community's needs and values.			X
Policy 10: Cooperate with other law-enforcement agencies to develop new methods of addressing crime. Support communication and coordination across federal, State and City law enforcement and corrections agencies.			X
Policy 11: Encourage the improvement of rehabilitation programs and facilities for criminals and juvenile offenders.			X

Table K-3: Oʻahu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
Objective B:	To protect the people of Oʻahu and their property against natural disasters and other emergencies, traffic and fire hazards, and unsafe conditions.			
Policy 1:	Keep up-to-date and enforce all City and County safety regulations.			X
Policy 2:	Require all developments in areas subject to floods and tsunamis, and coastal erosion to be located and constructed in a manner that will not create any health or safety hazards or cause harm to natural and public resources.			X
Policy 3:	Participate with State and federal agencies in the funding and construction of flood control projects, and prioritize the use of ecologically sensitive flood-control strategies whenever feasible.			X
Policy 4:	Collaborate with State and federal agencies to provide emergency warnings, protection, mitigation, response, and recovery, during and after major emergencies such as tsunamis, hurricanes, and other high-hazard events.			X
Policy 5:	Cooperate with State and federal agencies to provide protection from war, civil disruptions, pandemics, and other major disturbances.	X		X
Policy 6:	Reduce hazardous traffic conditions.			X
Policy 7:	Provide adequate resources to effectively prepare for and respond to natural and manmade threats to public safety, property, and the environment.	X		
Policy 8:	Foster disaster-ready communities and households through implementation of resilience hubs and other resiliency strategies.			X
Policy 9:	Plan for the impacts of climate change and sea level rise on public safety, in order to minimize potential future hazards.			X
Policy 10:	Develop emergency management plans, policies, programs, and procedures to protect and promote public health, safety, and welfare of the people.			X
Policy 11:	Provide educational materials on emergency management preparedness, fire protection, traffic hazards, and other unsafe conditions.			X
PART IX: HEALTH AND EDUCATION				
Objective A:	To protect the health and well-being of residents and visitors.			
Policy 1:	Encourage the provision of health-care facilities that are accessible to both employment and residential centers.			X
Policy 2:	Encourage prompt and adequate ambulance and first-aid services in all areas of Oʻahu.			X
Policy 3:	Coordinate City and County health codes and other regulations with State and Federal health codes to facilitate the enforcement of air-, water-, and noise-pollution controls.			X
Policy 4:	Integrate public health concerns such as air and water pollution as a consideration in land use planning decisions.			X
Policy 5:	Encourage healthy lifestyles by supporting opportunities that increase access to and promote consumption of fresh, locally grown foods.			X

Table K-3: Oʻahu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
Policy 6: Encourage healthy lifestyles through walkable and livable communities, safe street crossings, safe routes to schools, and parks and pathways for pedestrians and bicyclists.			X
Policy 7: Support efforts to make healthcare accessible and affordable for everyone.			X
Policy 8: Support efforts to improve and expand access to mental health, drug treatment, community-based programs, and other similar programs for those requiring such services.			X
Policy 9: Support becoming an age-friendly city that provides people of all ages with user-friendly parks and other public gathering places, that offers safe streets and multi-modal transportation options, that provides an adequate supply of affordable housing, that encourages growth in needed and desirable jobs, that provides quality health-care and support services, and that encourages civic participation, social inclusion, and respect between interest groups.			X
Policy 10: Plan for our aging population's growing health-care, personal service, and diverse daily activity needs, and encourage these services to be provided in a timely manner, including age-specific social activities.			X
Objective B: To provide a wide range of educational opportunities for the people of Oʻahu.			
Policy 1: Support education programs that encourage the development of employable skills.			X
Policy 2: Encourage the provision of informal educational programs for people of all age groups.			X
Policy 3: Encourage the after-hours use of school buildings, grounds, and facilities.			X
Policy 4: Encourage the construction of school facilities that are designed for flexibility and high levels of use.			X
Policy 5: Facilitate the appropriate location of childcare facilities as well as learning institutions from the preschool through the university levels			X
Policy 6: Encourage outdoor learning opportunities and venues that reflect our unique natural environment and Native Hawaiian culture.			X
Objective C: To make Honolulu the center of higher education in the Pacific.			
Policy 1: Encourage continuing improvement in the quality of higher education in Hawaiʻi, as well as ways to make higher education more affordable.			X
Policy 2: Encourage the development of diverse opportunities in higher education.			X
Policy 3: Encourage research institutions to establish branches on Oʻahu.			X
Policy 4: Establish Honolulu as a knowledge center and international Pacific crossroads hub.			X
PART X: CULTURE AND RECREATION			
Objective A: To foster the multiethnic culture of Hawaiʻi and respect the host culture of the Native Hawaiian people.			
Policy 1: Recognize the Native Hawaiian host culture, including its customs, language, history, and close connection to the natural environment, as a dynamic, living culture and as an integral part of Oʻahu's way of life.			X

Table K-3: Oʻahu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable	S	N/S	N/A
Policy 2: Promote the preservation and enhancement of local cultures, values and traditions.			X
Policy 3: Encourage greater public awareness, understanding, and appreciation of the cultural heritage and contributions to Hawaiʻi made by Oʻahu's various ethnic groups.			X
Policy 4: Foster equity and increased opportunities for positive interaction among people with different ethnic, social, and cultural backgrounds.			X
Policy 5: Preserve the identities of the historical communities of Oʻahu.			X
Objective B: To preserve and enhance Oʻahu's cultural, historic, architectural, and archaeological resources.			
Policy 1: Promote the restoration and preservation of early Hawaiian structures, artifacts, and landmarks.			X
Policy 2: Identify and, to the extent possible, preserve and restore buildings, sites, and areas of social, cultural, historic, architectural, and archaeological significance.	X		
Policy 3: Cooperate with the State and federal governments in developing and implementing a comprehensive preservation program for social, cultural, historic, architectural, and archaeological resources.	X		
Policy 4: Promote the interpretive and educational use of cultural, historic, architectural, and archaeological sites, buildings, and artifacts.	X		
Policy 5: Seek public and private funds, and encourage public participation and support, to protect, preserve and enhance social, cultural, historic, architectural, and archaeological resources.	X		
Policy 6: Provide incentives for the restoration, preservation, maintenance, and enhancement of social, cultural, historic, architectural, and archaeological resources.	X		
Policy 7: Encourage the protection of areas that are historically important to Native Hawaiian cultural practices and to the cultural practices of other ethnicities, in order to further preserve and continue these practices for future generations.			X
Objective C: To foster the visual and performing arts.			
Policy 1: Encourage and support programs and activities for the visual and performing arts.			X
Policy 2: Encourage creative expression and access to the arts by all segments of the population.			X
Policy 3: Provide permanent art in appropriate City public buildings and places.			X
Objective D: To provide a wide range of recreational facilities and services that are readily available to residents and visitors alike, and to balance access to natural areas with the protection of those areas.			
Policy 1: Develop and maintain community-based parks to meet the needs of the different communities on Oʻahu.			X
Policy 2: Develop, maintain, and expand a system of regional parks and specialized recreation facilities, based on the cumulative demand of residents and visitors.			X
Policy 3: Develop, maintain, and improve urban parks, squares, and beautification areas in high density urban places.			X

Table K-3: Oʻahu General Plan S = Supportive, N/S = Not Supportive, N/A = Not Applicable		S	N/S	N/A
Policy 4:	Encourage public and private botanic and zoological parks on Oʻahu to foster an awareness and appreciation of the natural environment.			X
Policy 5:	Encourage the State to develop and maintain a system of natural resource-based parks, such as beach, shoreline, and mountain parks.			X
Policy 6:	Ensure that public recreational facilities balance the demand for facilities against capital and operating cost constraints so that they are adequately sized and properly maintained			X
Policy 7:	Ensure and maintain convenient and safe access to beaches, ocean environments and mauka recreation areas in a manner that protects natural and cultural resources.			X
Policy 8:	Encourage ocean and water-oriented recreation activities that do not adversely impact the natural environment and cultural assets, or result in overcrowding or overuse of beaches, shoreline areas and the ocean.			X
Policy 9:	Require all new developments to provide their residents with adequate recreation space.			X
Policy 10:	Utilize our unique natural environment in a responsible way to promote cultural events and activities, and maintain cultural practices.			X
Policy 11:	Encourage the after-hours, weekend, and summertime use of public schools facilities for recreation.			X
Policy 12:	Provide for safe and secure use of public parks, beaches, and recreation facilities.			X
Policy 13:	Create and promote recreational venues for kūpuna and keiki and for kamaʻāina and malihini.			X
Policy 14:	Encourage the State and Federal governments to transfer excess and underutilized land to the City and County for public recreation use.			X
PART XI: GOVERNMENT OPERATIONS AND FISCAL MANAGEMENT				
Objective A:	To promote increased efficiency, effectiveness, and responsiveness in the provision of government services by the City and County of Honolulu.			
Policy 1:	Maintain and adequately fund County government services at the level necessary to be effective.			X
Policy 2:	Promote alignment and consolidation of State and City functions whenever more efficient and effective delivery of government programs and services may be achieved.			X
Policy 3:	Ensure that government attitudes, actions, and services are sensitive to community needs and concerns, and held accountable to the public trust.			X
Policy 4:	Sufficiently fund and staff the timely preparation, maintenance, and update of public policies and plans to guide and coordinate City programs and regulatory responsibilities.			X
Policy 5:	Expand the adoption of technology across all City agencies to achieve greater transparency, efficiency, and accountability to the general public throughout government operations.			X

Table K-3: Oʻahu General Plan **S = Supportive, N/S = Not Supportive, N/A = Not Applicable**	**S**	**N/S**	**N/A**
Objective B: To ensure fiscal integrity, responsibility, and efficiency by the City and County government in carrying out its responsibilities.			
Policy 1: Provide for a balanced budget.			X
Policy 2: Allocate fiscal resources of the City and County to efficiently implement the policies of the General Plan and Development Plans.			X
Policy 3: Ensure accountability and transparency in government operations.			X
Objective C: To achieve equitable outcomes for City programs, policies, and allocation of resources throughout the Oʻahu community.			
Policy 1: Promote policies that actively address and eliminate disparate outcomes for historically underserved communities.			X
Policy 2: Seek equitable distribution of City investments towards promoting employment opportunities, infrastructure, and other community benefits appropriate to the community needs and proportionate to the population size.			X
Policy 3: Promote adherence to processes that advance procedural, distributional, structural, intergenerational, and cultural equity within the City.			X
Policy 4: Provide resources for City employees to understand and actively advance equity solutions within all agencies of City government.			X

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