ARMY TRAINING LAND RETENTION AT PŌHAKULOA TRAINING AREA RECORD OF DECISION

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RECORD OF DECISION

Based on the analysis of the Army Training Land Retention at Pōhakuloa Training Area Environmental Impact Statement, the United States Army (Army) has decided to pursue retention of 19,700 acres of land at Pōhakuloa Training Area (PTA), Hawai'i.

1.0 Background

The Army conducts training to meet its federally-mandated readiness mission based on national and Army security and defense strategies. In the state of Hawai'i (State), United States (U.S.) Army Hawaii (USARHAW) conducts training on O'ahu Island and Hawai'i Island. PTA, on Hawai'i Island, is the largest contiguous military live-fire range and maneuver training area in the State and is the premier military training center in the Pacific region. It is the only training area in Hawai'i where USARHAW units can complete all mission essential tasks, and it is the only training area in Hawai'i or the Pacific that can accommodate units larger than company-sized (i.e., battalion and brigade) for live-fire and maneuver exercises.

Training opportunities at PTA support the Army's mission to defend the United States. USARHAW provides ready forces to the Army Contingency Response Force on order from U.S. Army Pacific (USARPAC) and the Pacific Response Force on order from U.S. Indo-Pacific Command (USINDOPACOM) (USARHAW, 2017a). PTA users rely on the installation to meet their agency-specific mission and readiness requirements. Primary users are the Army, Army Reserve and Hawaii Army National Guard; U.S. Marine Corps, including the 3rd Marine Regiment; U.S. Navy; U.S. Air Force; state and county first responders and firefighters; Hawai'i Civil Defense Agency; Hawai'i Emergency Management Agency; State Office of Homeland Security; and Hawai'i Police Departments.

PTA is the primary ground maneuver tactical training area for USINDOPACOM and is used for joint and multinational training exercises (e.g., Rim of the Pacific Exercise).

The Army leases approximately 23,000 acres of land at PTA from the State. This land is referred to as "Stateowned land" in the Final Environmental Impact Statement (FEIS). The 65-year lease of the State-owned land expires on August 16, 2029. Over the past six decades, the State-owned land has been a critically important component of the approximately 132,000-acre training area. The State-owned land provides access to the U.S. Government-owned portions of PTA and supports numerous training facilities and capabilities that are essential to USARHAW, other military services, and local Hawaiian agencies. The Stateowned land contains key training facilities and links the contiguous maneuver area that accommodates exercises at larger than company size, not available anywhere else in the State. The FEIS analyzed a range of reasonable alternatives, differentiated by the acreage of state land for which the Army would pursue retention. It also looked at the relative impacts of different retention methods, including a new lease or fee simple ownership. The FEIS also considered a No Action Alternative, under which the lease would expire, and the Army would not retain any portion of the leased land. The action alternatives assume continued military training will occur. This ROD does not select the retention method, which would be determined through separate negotiations with the state and the federal real estate acquisition process. This FEIS provided Army senior leaders with a comprehensive review of potential environmental impacts associated with the alternatives and the No Action Alternative and informs the decision-making process



for selecting an alternative for implementation. The FEIS meets the requirements of both the National Environmental Policy Act (NEPA) and the Hawai'i Environmental Policy Act (HEPA). The FEIS is incorporated by reference into this Record of Decision (ROD). The Army selects the preferred alternative identified in the FEIS as Alternative 2; retention of 19,700 acres at PTA.

2.0 Purpose and Need

The purpose of the Proposed Action is to enable USARHAW and other users to continue military training on the State-owned land within PTA to meet their training and operational mission requirements. The Proposed Action is needed to preserve limited maneuver area, provide austere environment training, enable access to major parcels of U.S. Government-owned land at PTA, retain substantial infrastructure investments, allow for future facility and infrastructure modernization, and maximize use of the impact area in support of USARHAW-coordinated training.

The unique landscape at PTA provides austere, real-world training. Approximately 54 percent of PTA's unrestricted maneuver area is located on the State-owned land. The State-owned land also provides essential connections for maneuvering throughout PTA. Retention of the State-owned land at PTA is critical because suitable maneuver area is limited due to surface geology. The State-owned land is necessary to access the training areas and training facilities on the State-owned land, as well as the ranges, training areas, and the impact area located on U.S. Government-owned land to the south. The State-owned land is also necessary to provide access among the three U.S. Government-owned portions of PTA (i.e., Cantonment and Bradshaw Army Airfield (BAAF), impact area and training ranges, and Keamuku Maneuver Area).

Critical facilities (e.g., Battle Area Complex [BAX], ammunition storage locations), utilities (e.g., electricity, potable water, communications), and infrastructure (e.g., roads, firebreaks/fuel breaks) are located on the State-owned land. Federal directives, including 10 United States Code Section 2852, *Military Construction Projects: Waiver of Certain Restrictions*, and Army Regulation 405-10, *Acquisition of Real Property and Interests Therein*, specify that to carry out military improvements or modernization efforts, a long-term interest (i.e., at least 25 years) in the land must be acquired. With fewer than five years remaining on the current lease, these directives limit the Army's ability to invest in improvements at PTA. USARHAW is unable to modernize existing facilities on the State-owned land without securing a long-term land interest.

No other training area in Hawai'i or the Pacific can accommodate collective training at larger than company size units. As currently configured, PTA provides the maneuver area, Special Use Airspace, training features, and critical facilities to meet USARHAW training requirements for Hawai'i-based units. Firing points (FPs) located on the State-owned land support training with indirect-fire weapons at long-range and maximize firing capabilities into the impact area. PTA provides the longest distance-to-target for indirect-fire weapons (i.e., artillery and mortars) of all training areas within 1,000 miles.

Loss of the State-owned land would result in substantial negative impacts to training because the Army would no longer have access to these critical maneuver areas, facilities, utilities, and infrastructure. Several of the training features and capabilities within the State-owned land are not available elsewhere within PTA or Hawai'i (battalion and brigade sized maneuver training, long range fires, etc.).

3.0 Selected Action

The Army is selecting retention of up to approximately 22,750 acres of the 23,000 acres of State-owned land at PTA in support of continued military training. Retention of all or a part of the approximately 22,750



acres of State-owned land would occur by acquiring a land interest allowing continued military use. The Proposed Action does not include a defined land retention duration because that would be negotiated with the State. The Army intends to secure a land interest for continued military use of a portion of the State-owned land prior to expiration of the 1964 lease (on August 16, 2029) to ensure uninterrupted training. Following a negotiated retention of the State-owned land, the Army will continue to conduct ongoing Army activities (i.e., military training; facility, utility, and infrastructure maintenance and repair activities; cultural and natural resource management actions; and associated activities such as emergency services) on the State-owned land retained. The Army will continue to permit and coordinate current activities (training and other activities such as public use programs) by other PTA users, including other Department of Defense (DoD) agencies, international partners, local agencies, and the community on the State-owned land retained by the Army.

The Selected Action is a real estate transaction (i.e., administrative action) that would enable continuation of current activities on the State-owned land retained by the Army. It does not include construction, modernization, or changes to current activities on the State-owned land retained. Additionally, the Proposed Action does not include changes to the use, size, or configuration of the Special Use Airspace overlying the State-owned land. Any future changes to training or military construction would be subject to separate NEPA analyses.

Current activities, including military training, within the State-owned land were previously analyzed, where required, in separate NEPA documents. The Army adheres to multiple best management practices (BMPs), standard operating procedures (SOPs), and mitigation measures, to implement ongoing environmental monitoring and conservation efforts related to training within the State-owned land. The Army will continue to execute these BMPs, SOPs, and mitigation measures under the Proposed Action.

The FEIS presented the potential environmental impacts of the Selected Action (land retention), continuation of current activities on State-owned land retained, ending current activities on State-owned land not retained, lease compliance actions, cleanup and restoration activities, and mitigation measures. If future cleanup and restoration activities differ from those assumed in this FEIS, they would not require subsequent NEPA analysis. Cleanup will be through the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process which has its own decision-making and remedy-selection procedures and is not subject to NEPA analysis.

Following lease expiration, in accordance with the lease terms or otherwise negotiated with the State, the Army will conduct various compliance actions within the State-owned land not retained. Applicable lease compliance actions that would occur after expiration of the current lease within the State-owned land not retained include actions such as reforestation, removing signs, removing or abandoning structures, and removing weapons and shells (e.g., bullet casings, mortar shells, artillery shells, rifle shells). Lease compliance actions are guided by the terms/conditions of the lease and negotiations with the State and will commence only after this ROD is executed.

In accordance with the lease terms and under the provisions of existing law, the Army retains responsibility for cleanup and restoration activities of closed ranges (i.e., State-owned land not retained); therefore, after expiration of the current lease, the Army will follow federal law (CERCLA) and regulations to determine how and when cleanup and restoration activities within the State-owned land not retained would occur, which is separate from this NEPA process.



4.0 Alternatives

The NEPA process requires consideration of reasonable alternatives for the Proposed Action. To be considered reasonable, alternatives must satisfy the purpose and need for the Proposed Action and meet the screening criteria discussed below. The alternatives carried forward for detailed analysis in the EIS are a practical representation of the range of reasonable alternatives regarding the amount (e.g., maximum, modified, and minimum) and location of land retained within the overall State-owned land footprint. The EIS analyzes the potential impacts associated with these reasonable alternatives. Additionally, NEPA requires the inclusion of a No Action Alternative. While the No Action Alternative would not satisfy the purpose and need for the action, it is analyzed in detail in the EIS.

The Army established screening criteria to identify the range of potential alternatives that meet the purpose and need for the Proposed Action. The Army used the following screening criteria to assess whether each alternative was reasonable and would be carried forward for evaluation in the EIS. The alternatives must:

- Allow for long-term use, maintenance, repair, and future modernization (future modernization is not currently planned and would require separate, future NEPA and HEPA analysis, as applicable) of vital ranges, facilities, U.S. Government-owned utilities, and infrastructure on the State-owned land in support of ongoing USARHAW training and operational requirements.
- 2. Include long-term use of contiguous unrestricted maneuver area to accommodate continued collective training, including live-fire and maneuver exercises at larger than company size.
- 3. Include long-term access on the State-owned land to permit continuation of ongoing activities (training, maintenance and repair activities, resource management actions, emergency services, public use programs) on the State-owned land and U.S. Government-owned land.
- 4. Enable continued full use of the impact area, including long-range indirect-fire weapons.
- 5. Be cost effective, fiscally allowable by federal statutes and regulations, and meet the requirements of DoD's approved Major Land Acquisition Waiver Request.

Alternatives 1, 2, and 3 adequately met all screening criteria and were carried forward for detailed analysis in the EIS.

4.1 Alternative 1: Full Retention

Under Alternative 1, the Army would retain approximately 22,750 acres (99 percent) of the State-owned land at PTA, including all U.S. Government-owned facilities, utilities, and infrastructure within the State-owned land retained. Additionally, the Army would retain all U.S. Government-owned utilities and associated access throughout the State-owned land not retained (i.e., electrical and communication systems in training area [TA] 2) via a real estate agreement to enable continued safe training and other activities on U.S. Government-owned land and State-owned land retained at PTA.

Alternative 1 would allow the Army to continue to manage and use approximately 22,750 acres of the State-owned land; maintain unrestricted access at and between the Cantonment area and Bradshaw Army Airfield (BAAF), impact area and training ranges, and Keamuku Maneuver Area; conduct ongoing military training, maintenance and repair activities, resource management actions, and associated activities; retain almost all of its investment in facilities, utilities, and infrastructure on the State-owned land; continue military training and other activities without downtime; and enable future modernization (which is not



currently planned and would require separate, future NEPA analysis) of the retained facilities, utilities, and infrastructure within the State-owned land. The Army would continue to permit and coordinate ongoing training and other activities by other PTA users on the State-owned land retained. This alternative would have negligible potential for encroachment (i.e., outside actions that inhibit normal military training and operations) and accidental or intentional trespass on U.S. Government-owned land at PTA from adjacent properties because the Army would continue to control access to most of the State-owned land. This alternative also maximizes military training noise buffer areas. Army control of land on the outer edges of the training area means that sensitive receptors would not be affected by noise from military training in the central part of PTA.

Under Alternative 1, the Army would give up approximately 250 acres of maneuver area as well as a road and training trail in the State-owned land not retained. Most of this area is critical habitat designated by U.S. Fish and Wildlife Service (USFWS) for the Palila, a federal and state listed endangered bird species. The State-owned land that would not be retained has no U.S. Government-owned facilities and limited U.S. Government-owned infrastructure (i.e. roads and training trails), has Palila critical habitat training restrictions, is partially north of Daniel K. Inouye (DKI) Highway (which limits training in this area due to its physical separation from the majority of the State-owned land and the impact area and training ranges), and has cinder cones in the portion that is south of DKI Highway (which further limits training). Consequently, Alternative 1 would have a negligible impact on the current activities conducted on the State-owned land.

4.2 Alternative 2: Modified Retention (Selected Alternative)

Under Alternative 2, the selected alternative, the Army will seek to retain approximately 19,700 acres (86 percent) of the State-owned land at PTA, including all U.S. Government-owned facilities, utilities, and infrastructure within the State-owned land retained. Additionally, the Army would retain all U.S. Government-owned utilities and associated access throughout the State-owned land not retained (i.e., electrical and communication systems in TAs 2, 10, 11, 15, and 16) via a real estate agreement to enable continued safe operation of U.S. Government-owned land and State-owned land retained at PTA.

Alternative 2 would allow the Army to continue to manage and use approximately 19,700 acres of the State-owned land; maintain access to and between the Cantonment area and BAAF, impact area and training ranges, and Keamuku Maneuver Area; conduct ongoing military training, maintenance and repair activities, resource management actions, and associated activities; retain much of its substantial investment in facilities, utilities, and infrastructure on the State-owned land; continue military training and other activities without downtime; and enable future modernization (which is not currently planned and would require separate, future NEPA analysis, as applicable) of the retained facilities, utilities, and infrastructure within the State-owned land. The Army would also continue to permit and coordinate ongoing training and activities by other PTA users on the State-owned land retained. This alternative would have negligible potential for encroachment and accidental or intentional trespass on U.S. Government-owned land at PTA from adjacent properties as the Army would continue to control access to most of the State-owned land.

Under Alternative 2, the Army would no longer have access to approximately 3,300 acres of restricted maneuver area, facilities, and roads and training trails on the State-owned land not retained. The State-owned land that would not be retained has limited facilities and infrastructure, has Palila critical habitat training restrictions, is mostly physically separated from the rest of the State-owned land by DKI Highway,



and has cinder cones in the portion south of DKI Highway. Consequently, Alternative 2 would have a negligible impact to the ongoing activities conducted in the State-owned land.

4.3 Alternative 3: Minimum Retention and Access

Under Alternative 3, the Army would retain approximately 10,100 acres (44 percent) of the State-owned land, including all U.S. Government-owned facilities, utilities, and infrastructure within the State-owned land retained, and 11 miles of select roads and training trails within the State-owned land not retained via a real estate agreement with the State. This acreage contains e vital training and support facilities and associated maneuver areas necessary for USARHAW to continue to meet its ongoing training requirements on the State-owned land. Additionally, the Army would retain all U.S. Government-owned utilities and associated access throughout the State-owned land not retained (i.e., electrical and communication systems in TAs 2, 10, 11, 15, 16, 19, and 22B) via a real estate agreement, and firebreaks/fuel breaks and associated access along most of the 11 miles of select roads and training trails proposed for retention within the State-owned land not retained.

Under Alternative 3, the Army would no longer have access to the training and support facilities (i.e., one ammunition holding area, two landing zones, and approximately 30 FPs), non-selected roads and training trails, and maneuver areas on the State-owned land not retained. The Army would lose access to approximately 12,900 acres of unrestricted maneuver areas, which is approximately 30 percent and 56 percent of the unrestricted maneuver areas on PTA and the State-owned land, respectively. The areas proposed to be retained include most of the training and support facilities, and commonly used roads and training trails, and all U.S. Government-owned utilities in the State-owned land; therefore, training capabilities and ongoing activities at PTA would be reduced by approximately 15 to 30 percent under Alternative 3. Loss of training area and decreased training options would negatively affect combat readiness of USARHAW and all military units that use PTA, as well as readiness of state and county government agencies that use PTA. Alternative 3 would increase the potential for encroachment and accidental or intentional trespass on U.S. Government-owned land at PTA from adjacent properties because the Army would control access to less than half of the State-owned land.

4.4 No Action Alternative

Under the No Action Alternative, the Army would not retain any of the State-owned land at PTA after the lease expires and would therefore no longer fund or manage cultural and natural resources management and protection programs or public use programs in the State-owned land. The Army would meet ongoing biological resources mitigation requirements (e.g., conservation fence units) on the State-owned land via reforestation of portions of the State-owned land or an alternative mitigation option negotiated with the USFWS and the State, as applicable. After the lease expires and in accordance with the lease terms, or otherwise negotiated with the State, the Army would conduct various lease compliance actions on the State-owned land.

The Army would continue to have land access to the Cantonment area, BAAF, and Keamuku Maneuver Area via DKI Highway but would have no land access to the impact area and training ranges south of the State-owned land, which would cease or severely limit Army training, maintenance and repair activities, resource management actions, wildfire protection and firefighting activities, emergency services, and biological resources mitigation requirements (e.g., conservation fence units) in the impact area and training ranges. Additionally, the Army would have no access to U.S. Government-owned utilities and infrastructure within the State-owned land, including the electrical substation for the installation,



communication equipment, roads, training trails, and firebreaks/fuel breaks, which would impact training, range operations, range and emergency services communication, use of the Cantonment area, emergency service access, and wildfire protection and firefighting activities. This alternative would result in the loss of approximately 54 percent of the unrestricted maneuver areas on PTA.

The No Action Alternative would compromise the territorial/spatial integrity of PTA and reduce USARHAW's collective live-fire and maneuver training capabilities at PTA from above the company level (i.e., battalion and brigade level) to the platoon level for infantry, artillery, and aviation units. Due to lack of required training capabilities, USARHAW would not be able to support ready forces to provide the Pacific Response Force or operate as the Army Contingency Response Force (USARHAW, 2017a). USARHAW (including the 25th Infantry Division [25ID]), 3rd Marine Regiment, many other military units, and state and county government agencies would be unable to train at PTA effectively. Loss of training would negatively affect combat readiness of USARHAW and all military units that use PTA, as well as the readiness of state and county government agencies that use PTA. Reduced training and limited utilities, including at the Cantonment area, would result in a reduction in training, emergency response, and natural resource conservation programs. Therefore, the Army would no longer provide community services, such as emergency response and conservation partnerships.

5.0 Public Involvement

The Army provided several opportunities for the public to participate in the NEPA process and thoroughly considered the public's comments in reaching its decision. These opportunities included a 40-day public scoping process, a 60-day public review period for the Draft EIS, a 45-day public review period for the Second Draft EIS (which addressed comments from the first Draft EIS), and publication of the FEIS accompanied by a 30-day waiting period before a final decision was made and this ROD was issued.

The Army invited federal, state, and local agencies, Native Hawaiian organizations, and the public to participate in all phases of the NEPA process. Additionally, a public notice published in multiple newspapers on multiple days was used to notify the public of the Army's intent to develop an EIS and to provide information regarding the Proposed Action and alternatives and to notify people of the opportunity to comment on the Draft and Second Draft EISs. The public notices were published in the West Hawaii Today, Hawaii Tribune Herald, and Honolulu Star-Advertiser newspapers on three separate dates for scoping, Draft EIS, and Second Draft EIS publications. Additionally, postcards with similar information were mailed via U.S. Postal Service to approximately 100 individual, agency, and organization stakeholders. Stakeholders consisted of individuals and organizations from contact lists maintained by the Army for PTA-related issues, regulatory agencies, and elected officials whose jurisdiction includes PTA. Publication affidavits and mailing notifications are available in the FEIS at Appendix C.

Substantive comments were considered, addressed and incorporated at each stage of public involvement and reflected in the respective NEPA documents. Oral comments were accepted at public meetings and through a dedicated phone line open during the 48-hour window of the public meetings. Written comments were accepted throughout the public comment periods using three methods: a comment form accessed via the project EIS website (https://home.army.mil/hawaii/ptaeis/project-home), a letter via U.S. Postal Service mail, or a message to the Army email address (usarmy.hawaii.nepa@army.mil).



5.1 Public Scoping

A Notice of Intent (NOI) in the Federal Register (FR), alerting the public of the Army's intent to prepare an EIS was published on September 4, 2020 (85 FR 55263). The Army published an amendment to the NOI on September 23, 2020 (85 FR 59753) to notify the public of the cancellation of in-person comment stations associated with the EIS Scoping Virtual Open House due to COVID-19 pandemic restrictions. The Army voluntarily chose to extend the NEPA scoping period beyond the required 30 days, and the 40-day scoping period ended on October 14, 2020.

5.2 Draft EIS

The Notice of Availability (NOA) for the Draft EIS was published in the FR on April 8, 2022 (87 FR 20826). A 60-day public comment period was initiated on that date and ended on June 7, 2022. A public notice was published in local newspapers, and postcards with similar information were mailed via U.S. Postal Service to approximately 100 individual, agency, and organization stakeholders, and elected officials (**Table 8-1** in the FEIS). Draft EIS public meetings were conducted April 25-26, 2022, to provide information to the public and agencies and to facilitate oral and written comments.

5.3 Second Draft EIS

The NOA for the Second Draft EIS was published in the FR on April 19, 2024 (89 FR 28753), starting a 45-day public comment period. A public notice was published in local newspapers and postcards with similar information were mailed via U.S. Postal Service to approximately 100 individual, agency, and organization stakeholders. Public meetings were held May 6-7, 2024.

5.4 Final EIS

The FEIS addressed substantive comments received on the First and Second Draft EIS and clarified information where relevant. **Appendix D** of the FEIS provided responses to the comments. The NOA for the FEIS was published in the FR on April 18, 2025 (90 FR 16514). A public notice that the FEIS had been published was placed in local newspapers on April 18, 19, and 20, 2025.

In addition to the standard NEPA public involvement process, key engagements with the State Department of Land and Natural Resources, stakeholders, and interested parties occurred throughout the NEPA process.

5.5 Comments received during the FEIS waiting period and whether they require supplementation Following publication of the FEIS, a 30-day waiting period began during which time the Army received additional comments. None of the comments triggered a requirement to supplement the FEIS.

Responses to those comments that were not completely addressed in the FEIS are addressed here.

5.5.1 Discovery and storage of funerary objects

During the May 9, 2025 FEIS acceptance determination public hearing before the Board of Land and Natural Resources (BLNR), several commenters stated that, in their opinion, information about funerary objects should have been discussed in the EIS. The comments reference items described below. An explanation of the discovery, actions to protect the objects, and rationale for excluding specific information about the objects follows.



In July 2022, important funerary artifacts were identified in a lava tube at PTA. The artifacts were inadvertently found on the State-owned land. The artifacts were confirmed to be funerary objects subject to the Native American Graves Protection and Repatriation Act (NAGPRA). No human remains were directly associated with this discovery; however, human skeletal remains were found in two other sites within 80 meters of the discovery. The Hawaii deputy State Historic Preservation Officer, Dr. Alan Downer, was notified of the discovery. During the July-August 2022 Leilani fire, Military Police were tasked to monitor the site because of soldiers training in the area.

In August 2022, during the first on-site consultation with consulting parties, a wildfire approached the site and the PTA fire department ordered everyone to evacuate the area. All consulting parties and Army staff were safely evacuated. The fire reached the lava tube and the vegetation around the opening was burned, exposing the previously hidden lava tube.

After the fire burned through the area, consultation resumed at the lava tube with the PTA Commander and Native Hawaiian organization/consulting parties, regarding the significant finds and options to ensure preservation of the fragile and environmentally sensitive artifacts. The consulting parties unanimously and unequivocally requested that the Army collect and remove the significant artifacts in order to protect them from possible looting or damage. Based on this request, the PTA Commander made the decision to collect the artifacts and place them in the certified PTA curation facility, which meets Secretary of Interior standards for curation facilities. Because of the request and actions by the PTA Commander and Army Cultural Resources professionals, the identification, safeguarding, consultation, and evacuation of this site ensured the funerary objects were conserved and protected from damage, destruction or loss.

While preparing the EIS, the consulting parties requested that the Army not include information about the funerary objects. Consulting parties also requested that the Army not share detailed information publicly and halt all further analysis, documentation and photos. There was concern that making this information publicly available would prompt inappropriate intrusion at the site and possible disturbance of nearby human remains. The Army honored this request and did not include specific information about the discovery and subsequent actions in the FEIS. The State Historic Preservation Department has been involved throughout the process. The funerary objects remain safely stored in the PTA curation facility, awaiting a determination by the State Land Board on their disposition. Additionally, while the FEIS did note the presence of human remains at PTA (SIHP 50-10-30-23694), the exact location of the human remains was not disclosed as part of the Army's duty to protect them under NAGPRA.

This information does not represent substantial new information about the selected action, the affected environment, or impacts. Nor does the information represent substantial new circumstances or information about the significance of adverse effects that bear on the analysis. It shows that the Army is meeting its obligations under NAGPRA, as stated in the FEIS. Specifically, the FEIS states that the Army's Cultural Resource Management program at PTA "involves identification, documentation, evaluation, and treatment of Historic Period and Traditional Hawaiian resources. It also includes curation of materials and associated records in accordance with 36 CFR Part 79 and site protection of cultural resources." The EIS also notes that the 2018 Section 106 Programmatic Agreement (PA) for PTA and the ICRMP (which provides SOPs for NAGPRA compliance) address inadvertent discoveries of iwi kūpuna (human remains) at PTA and stipulate that any iwi kūpuna accidentally uncovered would be protected from additional disturbance until appropriate NAGPRA compliance is completed.



The FEIS discusses the area generally at p. 3-91: "As of April 2021, iwi kūpuna (Native Hawaiian human skeletal remains) have been identified at one site within the ROI (SIHP 50-10-30-23694). Under NAGPRA, the Army completed notification and consultation for this burial site and left the iwi kūpuna in place. It is USAG-HI policy to leave burials in place and undisturbed wherever possible after consultation with Native Hawaiian families, groups, and individuals." Section 3.4.4.5, at p. 3-88, contains an extensive discussion of the Leilani fire. Therefore, the undisclosed information does not require supplementation of the FEIS.

5.5.2 Cleanup of State-owned lands not retained

The Army received additional comments from the U.S. Environmental Protection Agency (USEPA), and comments were made during the May 9, 2025 BLNR hearing regarding cleaning up hazardous substances and munitions and explosives of concern (MEC) on State-owned lands not retained. Cleanup is controlled and guided by the terms of the lease, federal statute, and negotiations with the State. Cleanup is discussed in the FEIS in Section 3.2. The scope and requirements are not part of the NEPA process and will occur through a separate process, also containing opportunities for public involvement, after publication of the ROD.

Because this process is thoroughly discussed in the FEIS, and is not included in the NEPA process, it does not represent new information or require supplementation of the FEIS.

6.0 New information not included in the FEIS: HIMARS conversion

The Army recently decided to convert one of the 25th Infantry Division's field artillery battalions to a Long-Range Fires Battalion equipped with the High Mobility Artillery Rocket System (HIMARS). The conversion will replace eight 105mm and six 155mm howitzers with sixteen HIMARS launcher systems. The unit will be stationed at Schofield Barracks on O'ahu, but will conduct live-fire training on PTA. As noted, PTA is the only installation where the required distance from firing point to impact area and restricted airspace meet HIMARS training requirements. Although some howitzer rounds used during training contained high explosives, HIMARS training rockets will be inert, and filled with a non-explosive material like concrete rather than high explosives. White phosphorus will not be used. Both day and night live-fire training will be conducted two times per year. Because the HIMARS is replacing fourteen artillery pieces and converting an artillery battalion, overall artillery training will be reduced.

HIMARS training has already occurred at PTA and was considered in the FEIS. The EIS noted that "The High Mobility Artillery Rocket System is used to deliver rocket fire from [firing points] located within State-owned land onto the impact area located on U.S. Government-owned land. Training on this system occurs no more than four times per year at PTA." Section 2.1.2, p. 2-8. HIMARs training was introduced at PTA in 2019 and was the subject of a Record of Environmental Consideration (REC) that applied a categorical exclusion. There have been no incidents with HIMARS training that caused unforeseen effects. Finally, the EIS fully evaluates the effects of high explosive munition use, which would be much more likely to cause wildfires than the inert training rounds to be used by HIMARS.

This information does not represent substantial information, substantial new circumstances, or significant adverse effects that bear upon the selected action. Notably, the conversion to HIMARS will reduce the current use of high explosive artillery rounds at PTA. Therefore, no supplementation of the FEIS is required.



7.0 Environmental Consequences and Mitigation Measures

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

In making conclusions on impacts, the FEIS assumes compliance with applicable regulations, BMPs, and SOPs. If compliance with applicable regulations and implementation of existing BMPs and SOPs are insufficient to reduce the intensity of an impact, the EIS identifies project-specific mitigation measures to avoid or minimize new adverse impacts. **Table 1** (Table ES-3 in the FEIS) provides a summary of the potential impacts of implementing each of the three action alternatives as well as the No Action Alternative. Significant adverse impacts were identified for: land use, biological resources, and cultural practices (**Table 2**; Table 3-38 in the FEIS). Impacts for other resource areas were less than significant. **Table 2** (Table 3-39 in the FEIS), below, identifies the impacts associated with the land retention options, for the Selected Alternative, and mitigation measures selected by the Army for resource areas with significant adverse impacts.

For most less-than-significant adverse impacts, no mitigation measures are recommended beyond the existing management measures discussed in each resource section in Chapter 3 of the Final EIS and the BMPs and SOPs discussed in Appendix E of the FEIS.



Table 1: Potential Environmental Impacts						
Resource	Alternative 1		Alternative 3	No Action Alternative		
Land Use	⊗⊘/⊗/+	⊗⊘/⊗/+	⊗⊘/⊗/+	· · · · · · · · · · · · · · · · · · ·		
Biological Resources	⊗/⊗/⊗	⊗/⊗/⊗	⊗/⊗/⊗	8		
Historic and Cultural Resources and Cultural Practices	⊙/⊙/⊙ ⊗/⊗/⊙	0/0/0 8/8/0	⊙/⊙/⊙ ⊗/⊗/⊙	O +		
Hazardous Substances and Waste	0/0/0	0/0/0	0/0/0	0		
Air Quality and Greenhouse Gases	0/0/0	0/0/0	0/0/0	0		
Noise	0/0/0	0/0/0	0/0/0	0		
Geology, Topography and Soils	0/0/0	0/0/0	0/0/0	0		
Water Resources	0/0/0	0/0/0	0/0/0	0		
Socioeconomics	0/0/0	0/0/0	0/0/0	8		
Environmental Justice	⊗/⊗/+	⊗/⊗/+	⊗/⊗/+	n Section		
Transportation and Traffic	0/0/0	0/0/0	0/0/0	0		
Airspace	0/0/0	0/0/0	0/0/0	0		
Electromagnetic Spectrum	0/0/0	0/0/0	0/0/0	0		
Utilities	0/0	0/0	0/0	8		
Human Health and Safety	0/0/0	0/0/0	0/0/0	0		

LEGEND

- ⊗ = significant, adverse impact
- = significant, adverse impact but could be reduced to less than significant
- ⊙ = less than significant impact
- + = significant, beneficial impact

Note: With the exception of utilities, which does not include a separate analysis of land not retained because impacts would extend beyond the State-owned land, significance impacts for the action alternatives are presented as lease impact/fee simple title impact/land not retained impact.



 New, long-term less than signific New, long-term at no less than a 	negligible, adverse impacts on encroachment management. significant, adverse impacts on land tenure, that could be reduced to cant (conservation district rules).	No mitigation measures recommended beyond
 No new impacts: No new impacts: New, long-term New, long-term less than significe New, long-term at no less than a 	negligible, adverse impacts on encroachment management. significant, adverse impacts on land tenure, that could be reduced to cant (conservation district rules).	measures
 New, long-term New, long-term less than signifie New, long-term at no less than a 	negligible, adverse impacts on encroachment management. significant, adverse impacts on land tenure, that could be reduced to cant (conservation district rules).	measures
 New, long-term less than signifie New, long-term at no less than a 	significant, adverse impacts on land tenure, that could be reduced to cant (conservation district rules).	measures
 New, long-term less than signific New, long-term at no less than a 	significant, adverse impacts on land tenure, that could be reduced to cant (conservation district rules).	recommended beyon
at no less than a	A 2 490 W 250 E ADDS 0 9 35	existing management measures, and
2 1	moderate, beneficial impacts on land tenure (new lease negotiated in equitable, fair market value).	acquisition at fair market value.
 Continued, long public trust land 	-term, negligible, adverse impacts on land tenure (military use of).	y
 Continued, long with the objecti 	term, significant, adverse impacts on land tenure (incompatibility ves and policies of the State).	
 Continued, long 	term, moderate, adverse impacts on recreation.	
Fee Simple Title Im	pacts:	
 No new impacts 	on vistas.	,
 New, long-term, 	negligible, adverse impacts on encroachment management.	
 New, long-term, and ownership). 	significant, adverse impacts on land tenure (transfer of land control	w)
 New, minor, ber equitable, fair m 	eficial impact on land tenure (sale of land at no less than an arket value).	1
future revenue g	significant, adverse impacts on land tenure (elimination of potential enerated for the public trust and the opportunity for future use for oses of the Admission Act 5(f) and HRS 171-18).	
 Continued, long- 	term, moderate, adverse impacts on recreation.	
Land Not Retained		
beneficial impacts o long-term, negligible	vistas or encroachment management; new, long-term, significant, in land tenure (resumption of State control of State-owned land); new e, beneficial impacts on land tenure (conservation district rules); new, e, beneficial impacts on recreation; new, short-term, negligible, recreation.	



Biological Resources Impacts	Biological Resource Mitigation
Land Retained	100000000000000000000000000000000000000
Lease Impacts: Continued long-term, moderate, beneficial impacts from uninterrupted Army natural resource conservation activities; continued long-term, moderate, adverse impacts from ongoing activities; continued long-term, negligible, adverse impacts on protected invertebrates from ongoing activities; continued long-term, significant, adverse impacts from potential training-related wildland fires due to ongoing activities within the State-owned land retained and associated activities within the U.S. Government-owned land; continued long-term, minor, adverse impacts from noise associated with ongoing activities; and continued long-term, negligible, adverse impacts from potential conflicts with species using PTA airspace.	The Army will: (1) conduct a multi- year research project to identify possible biological controls for invasive <i>C. setaceus</i> ; (2) complete installation invertebrate surveys;
Fee Simple Title Impacts: The same as lease impacts.	(3) complete an ungulate impact assessment;
Land Not Retained New long-term, negligible, adverse impacts from increased public access; new long-term, negligible, beneficial impacts from ceased training, maintenance, and repair activities and associated noise; new long-term, negligible, beneficial impacts from lease compliance actions; new short-term, negligible, adverse impacts from lease compliance actions and	4) negotiate and document an agreement with the State to monitor wildfires on land not retained; and
cleanup and restoration activities; and continued long-term, significant, adverse impacts from potential training-related wildland fires due to ongoing activities within the State-owned land retained and associated activities within the U.S. Government-owned land.	5) add additional thermal technology equipment. The additional thermal technology equipmer would enable firefighting personne to locate and eliminate hot spots where a fire persists. The Army will install approximately six to eight infrared camera that provide adequate coverage across the training area for wildland heat signature monitoring



Table 2. Potential Environmental Impacts and Selected Mitigation for Prefe	rred Alternative
Historic and Cultural Resources and Cultural Practices Impacts	Cultural Practices Mitigation
Historic and Cultural Resources Land Retained Lease Impacts: No new impacts from ongoing activities; continued long-term, moderate, beneficial impacts from the continuation of Cultural Resource Management (CRM) programs and actions that preserve and protect historic and cultural resources; continued long-term, moderate, adverse impacts from ongoing activities. Fee Simple Title Impacts: The same as lease impacts. Land Not Retained New long-term, negligible, adverse impacts from increased public access; new short-term, negligible, adverse impacts from lease compliance actions and cleanup and restoration activities; new long-term, negligible, beneficial impacts from discontinuation of military activities and associated impacts. Cultural Practices Land Retained Lease Impacts: No new impacts from ongoing activities; continued, long-term, significant, adverse impacts to autropt pages limitations from pages impacts to autropt pages limitations from pages impacts.	The Army will: 1) develop a formal access plan for Native Hawaiian organizations, individuals, and consulting parties, 'ohana, lineal descendants, and cultural practitioners; 2) install interpretive panels at the Gilbert Kahele Recreation Area illustrating the historical and cultural importance of the Saddle Region;
adverse impacts to current access limitations from continued DoD control of the land; and continued long-term, significant, adverse impacts due to potential training-related wildland fires impacting biological resources that are important to the cultural practices of Native Hawaiians. Fee Simple Title Impacts: The same as lease impacts. Land Not Retained New long-term, negligible, adverse impacts from increased public access; new short-term, minor, adverse impacts from lease compliance actions and cleanup and restoration activities; new long-term, minor, beneficial impacts from discontinuation of military activities and associated impacts.	3) negotiate an agreement with the State to monitor wildfires on land not retained; and 4) add advanced wildfire monitoring technology including additional thermal technology equipment.
Historic and Cultural Resources Level of Significance: Less than significant for lease, fee simple title, and land not retained. Cultural Practices Level of Significance: Significant, adverse impacts for lease and fee simple title, and less than significant for land not retained.	



	Mitigation
Lease Impacts: Continued, long-term, significant, adverse, disproportionate impacts on communities with environmental justice concerns from Army retention of ceded public trust land; continued long-term, significant, adverse, disproportionate impacts on communities with environmental justice concerns from potential training-related wildland fires associated with ongoing activities that could impact biological resources important to Native Hawaiian cultural practices; continued, long-term, significant, adverse, disproportionate impacts on communities with environmental justice concerns from ongoing, cultural access limitations and the perception that their sacred and traditionally and culturally important land is under an unjust military occupation; and continued, long-term, minor, adverse, disproportionate impacts on communities with environmental justice concerns from traffic associated with ongoing activities within the State-owned land retained. Fee Simple Title Impacts: New, long-term, significant, adverse, disproportionate impacts on communities with environmental justice concerns from removal of ceded lands from public trust; continued long-term, significant, adverse, disproportionate impacts on communities with environmental justice concerns from potential training-related wildland fires associated with ongoing activities that could impact biological resources important to Native Hawaiian cultural practices; continued, long-term, significant, adverse, disproportionate impacts on concerns from ongoing, limited cultural access and the ongoing perception that their sacred and traditionally and culturally important land is under an unjust military occupation; new long-term, significant, beneficial impacts would be realized through land sale proceeds that fund Native Hawaiian and public programs; and continued, long-term, minor, adverse, disproportionate impacts on communities with environmental justice concerns from traffic associated with ongoing activities within the State-owned land retained. Land Not R	The Army will 1) develop a formal access plan for Native Hawaiian organizations, individuals, and consulting parties, 'ohana, lineal descendants, and cultural practitioners; 2) install interpretive panels at the Gilbert Kahele Recreation Area illustrating the historical and cultural importance of the Saddle Region; 3) negotiate an agreement with the State to monitor wildfires on land not retained; and 4) add advanced wildfire monitoring technology including additional thermal technology equipment



Human Health and Safety Impacts	Human Health and Safety Mitigation
Land Retained Lease Impacts: No new impacts on human health and safety. Continued long-term, minor, adverse impacts from ongoing aircraft operations and military munitions use; and continued long-term, minor, beneficial impacts from PTA providing emergency services beyond the installation and permitting non-DoD emergency services agencies to train on the installation. Fee Simple Title Impacts: The same as lease impacts. Land Not Retained No new impacts on human health and safety and wildfire risk or wildland fire management from the transfer of wildfire protection and firefighting activities. New long-term, negligible, adverse impacts on human health and safety due to the locations of accident potential zones and explosive safety quantity-distance arcs that would remain active on State-owned land not retained. New long-term, negligible, beneficial impacts from the potential decrease of feral ungulates along DKI Highway.	The Army will: 1) negotiate and document an agreement with the State to monitor wildfires on land not retained; and 2) add additional thermal technology equipment. The additional thermal technology equipment would enable firefighting personnel to locate and eliminate hot spots where a fire persists. The Army will install approximately six to eight infrared camera that provide adequate coverage across the training area for wildland heat signature monitoring.
Level of Significance: Less than significant for lease, fee simple title, and land not retained.	3° H - Y_1 - 2

The Army is adopting all mitigation measures identified in Table 2 and will begin their implementation no later than October 2028. The Army will monitor the mitigation measures to ensure their implementation and effectiveness and has developed a mitigation monitoring plan (Attachment 1). The monitoring plan defines the goal(s) and objective(s) of the mitigation measures and includes timelines for mitigation implementation and thresholds to determine the effectiveness of the mitigation measures. The status of each mitigation measure will be reported annually in accordance with the mitigation monitoring plan.

Should funding be available prior to the 2029 fiscal year, mitigation measures and mitigation monitoring may be initiated prior to October 2028 as funding becomes available.



8.0 Decision

We have considered all analysis and results in the FEIS, which is incorporated by reference, comments provided during public comment and review periods, and the Army Mission requirements. The FEIS assessed the potential environmental impacts of the alternatives on the human, cultural, and natural environments. Based on this thorough review, we have determined, on behalf of the Army, that the Army will proceed with Alternative 2 (the preferred alternative in the FEIS): modified retention of approximately 19,700 acres of State-owned land at PTA. This alternative is summarized in **Section 4.2** of this ROD and described fully in **Chapter 2** of the FEIS.

Under Alternative 2, the Army will continue current activities on the State-owned land retained. Additionally, the Army will retain all U.S. Government-owned utilities and associated access throughout the State-owned land not retained (i.e., potable water and fire protection water, electrical, and communication systems) to enable continued safe operation of U.S. Government-owned land and State-owned land retained at PTA. This would be accomplished through execution of appropriate real estate arrangements such as rights of way or easements. Alternative 2 includes the following Army actions and responsibilities:

- Continue to conduct Army activities (training, maintenance and repair activities, resource management actions, and associated activities such as emergency services) on the State-owned land retained (approximately 19,700 acres).
- Continue to permit and coordinate other PTA users' activities (training and other activities such as public use programs) on the State-owned land retained.
- Continue to use, maintain, and repair U.S. Government-owned utilities on the State-owned land not retained to ensure their operability for U.S. Government-owned land and State-owned land retained.

The following Army actions and responsibilities are not specifically listed as part of Alternative 2 but would be triggered when the lease expires for the State-owned land not retained (approximately 3,300 acres):

- Once the lease expires, and in accordance with the lease terms or otherwise negotiated with the State, the Army will conduct various lease compliance actions within the State-owned land not retained.
- In accordance with the lease terms and under the provisions of existing law, the Army retains responsibility for cleanup and restoration of closed ranges (i.e., State-owned land not retained). Therefore, after the current lease expires, the Army will follow federal laws and regulations to determine how and when cleanup and restoration activities for hazardous substances and munitions and explosives of concern (MEC) within the State-owned land not retained would occur. Cleanup of hazardous substances and MEC will be completed under CERCLA authorities and processes, which has its own public involvement requirements, coordination with federal and state agencies, and decision-making process.

Lease compliance actions and cleanup and restoration for hazardous and toxic materials and wastes, including MEC, within the State-owned land not retained is explained in **Section 2.1** of the FEIS.

As noted in the FEIS, only after execution of the ROD will the Army consider the appropriate land retention estate(s) and method(s) based on the selected alternative and negotiation with the State.



9.0 Rationale for the Decision

The decision to select and implement Alternative 2 is based on consideration of the full analyses of all alternatives, including the No Action Alternative, contained in the FEIS, comments provided during formal public comment and review periods, and an evaluation of the ability of each alternative to meet the purpose and need for the Proposed Action. Thus, we considered the relative strengths and weaknesses of each alternative in light of the alternative's ability to meet the Army's need for the Proposed Action.

Pursuant to that detailed analysis and consideration of all alternatives, Alternative 2 was selected for implementation. Alternative 2 was selected because it best meets the Army's training needs while balancing the Army's obligations for stewardship of the environment. Decision makers for the Army were fully informed about the range of impacts to sensitive environmental and cultural resources.

Alternative 2 reduces the leased State-owned land area by approximately 3,300 acres. Most of the State-owned land not retained is on the north side of the DKI Highway, contains Palila critical habitat, and is not used for training. Consequently, Alternative 2 would have a negligible impact on the Army's ongoing activities conducted in the State-owned land that is critical to maintaining readiness.

In reaching this decision, we considered the positives and negatives of all alternatives. We balanced concerns of national policy on the one hand and environmental impacts of the alternatives on the other. Alternative 1, maximum retention, fully meets the purpose and need for the Proposed Action but unnecessarily retains Army control, and thus restricts access, to approximately 3,300 acres of land better suited to other uses, including continued protection of critical habitat for the endangered Palila. Not retaining this portion of State-owned land returns control to the State for natural and cultural resource management. Alternative 3 does not meet the purpose and need of the Proposed Action due to the degraded training opportunities remaining on the State-owned land retained. Loss of significant unrestricted maneuver space, FPs, and other infrastructure will negatively impact both DoD mission readiness and local agency training requirements. Alternative 2 maximizes mission requirements, critical habitat management, returning land to the State to manage, and fiscal considerations, meeting the purpose and need of the Proposed Action while limiting retention to only those lands actively used and providing maximum benefit to mission accomplishment.

Under Alternative 2, the Army will continue to manage and use the majority of the land and all of the U.S. Government-owned utilities in the State-owned land; maintain access to the Cantonment and BAAF, impact area and training ranges, and the Keamuku Maneuver Area; conduct ongoing military training, maintenance and repair activities, resource management actions, and associated activities; retain much of its substantial investment in facilities, utilities, and infrastructure on the State-owned land; continue military training and other activities without downtime; and enable future modernization (not currently planned and would require separate, future NEPA and HEPA analysis, as applicable) of the retained facilities, utilities, and infrastructure within the State-owned land. This alternative would have negligible potential for encroachment and accidental or intentional trespass on U.S. Government-owned land at PTA from adjacent properties because the Army would continue to control access to most of the State-owned land. Importantly, this alternative would return land to the State for productive use, consistent with its designation as a conservation district, enabling the State to manage public use programs and Palila critical habitat without interference from military training.



All practicable means and mitigation to avoid or minimize environmental harm from the selected alternative have been adopted.

Jeff L. Waksman, Ph.D.

Assistant Secretary of the Army (Acting) Installations, Energy and Environment U.S. Army 7/31/25

Date

Rachel D. Sullivan

Colonel

US Army Garrison Hawaii

Commanding

Date



Attachment 1: Mitigation Monitoring Plan

RESOURCE/AREASE	PROPOSED.	DESCRIPITION/SCOPE.OF WORK	TIMING	XI MONITORING
Biological Resources and Human Health and Safety	Negotiate agreement with State to monitor wildfires on land not retained	The Army will negotiate an agreement with the State to monitor wildfires on land not retained and an agreement document will be developed with the State. The agreement will be implemented once all parties sign the agreement document or when the land retention estate document (e.g., lease or deed) is executed, whichever is later.	Negotiations to begin no later than October 2028.	Negotiated plan will be provided to USARHAW Senior Commander by August 2029.
	Thermal technology	In addition to the current thermal technology at PTA, the Army will add advanced technology, including additional thermal technology equipment. The additional thermal technology equipment would enable firefighting personnel to locate and eliminate hot spots where a fire persists. The Army will install approximately six to eight infrared cameras that provide adequate coverage across the training area for wildfire heat signature monitoring—three cameras in the Keamuku Maneuver Area, three cameras in the Põhakuloa Training Area, and one or two additional mobile cameras.	Contracting and installation will begin no later than October 2028.	Documentation of installation of cameras will be provided by USAG-PTA Garrison Commander to USAG-HI Garrison Commander by August 2029.

RESOURCE AREAS	PROPOSED MITIGATION	DESCRIPTION/SCOPE OF WORK	TIMING	MONITORING
Biological Resources	Cenchrus setaceus (fountain grass) biocontrol	The Army will conduct a multi-year research project to identify possible biological controls of invasive <i>C. setaceus</i> . This project will include establishing an experimental population for non-target testing at a controlled facility, conducting non-target testing, and deploying the biological control if one is identified to be successful during testing.	Will begin no later than October 2028.	Annual reporting by USAG-PTA Garrison Commander will be sent to USAG-HI Garrison Commander of findings for ongoing biocontrol measures and analyses.
Biological Resources	Installation invertebrate study	The Army will conduct an installation invertebrate study to identify the presence and types of invertebrates located within PTA. The Army proposes to sample three locations within each of five different habitat types for a total of fifteen locations and develop a report of findings.	A study will begin no later than October 2028.	A report documenting the results of the invertebrate study will be completed by April 2031 and will be provided by USAG-PTA Garrison Commander to USAG-HI Garrison Commander.
	Vegetation community health and ungulate impact assessment	The Army will conduct a study to assess ungulates' impact on the health of the vegetation community at PTA.	A study will begin no later than October 2028 and identify an implementation plan, if needed, dependent on the results of the assessment.	A report documenting the results of vegetation health and proposed ungulate control measures will be produced by April 2030 provided by USAG-PTA Garrison Commander to USAG-HI Garrison Commander.
Historic and Cultural Resources and Cultural Practices	Cultural Access Plan	The Army will develop a formalized access plan for quarterly access for Native Hawaiian organizations, individuals, and consulting parties, 'ohana, lineal descendants, and cultural practitioners.	Consultation will begin no later than October 2028.	An executed access plan will be provided to USARHAW Senior Commander by August 2029.

PR RESOURGE AREAS MIT	OPOSED.	DESCRIPTION/SCOPE OF WORK		MONITORING
panel	s at Gilbert e State Park	The Army proposes to install interpretive panels at the Gilbert Kahele Recreation Area to illustrate the historical and cultural importance of the Saddle Region. The interpretive panels will be accessible to community members and visitors of the park.	Consultation will begin no later than October 2028.	Installation of interpretive panels will be completed by August 2030; and reported to USARHAW Senior Commander.

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