

QUESTIONS AND ANSWERS

Record of Decision for the Environmental Impact Statement Regarding Army Training Land Retention at Pōhakuloa Training Area, Hawai'i

August 6, 2025

Q-1. What is the Pōhakuloa Training Area (PTA) and what is it used for?

A-1. PTA is on the island of Hawai'i and encompasses approximately 132,000 acres of land for the specific purpose of preparing military personnel for the rigors of combat. U.S. Army Hawai'i (USARHAW) conducts training at PTA to meet its federally mandated mission of readiness. Training offered at installations such as PTA supports the U.S. Army's fulfillment of its role in the nation's defense. Users of PTA, including the U.S. Army, U.S. Marine Corps, U.S. Navy, U.S. Air Force, U.S. Army Reserve, Hawai'i Army National Guard, Hawai'i Air National Guard, State and County of Hawai'i first responders and firefighters, Hawai'i Civil Defense Agency, Hawai'i Emergency Management Agency, State Office of Homeland Security, Hawai'i Police Department, and others, rely on the installation to fulfill agency-specific mission and readiness requirements. PTA is the largest contiguous live-fire range and maneuver training area in Hawai'i and is considered the Pacific region's premier military training center. It is the only U.S. training area in the Pacific region where USARHAW units can complete all mission-essential tasks and the only U.S. training area in Hawai'i that can accommodate larger than company-sized units for live-fire and maneuver exercises.

Q-2. What is the history of military training at PTA and how would PTA support future military needs?

A-2. During World War II, the U.S. Marine Corps trained on the land now known as PTA. PTA was formally established in 1956 through an agreement between the Territory of Hawai'i and the Army. In 1964, the State of Hawai'i granted the Army a 65-year lease of approximately 23,000 acres of land adjacent to PTA for military purposes. The state-owned land now contains utilities, critical infrastructure, maneuver area, and key training facilities, some of which are not available elsewhere in Hawai'i. The parcel also provides access between the PTA cantonment area and approximately 84,000 acres of adjacent, federally owned land at PTA. The state-owned land has been key to PTA's ability to support numerous training requirements – including austere-environment training – for USARHAW, other military services, and state/local agencies.

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

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

Under Hawai'i Revised Statutes Chapter 343 and Hawai'i Administrative Rules (HAR) Chapter 11-200.1 – collectively referred to as the Hawai'i Environmental Policy Act

(HEPA) – use of state lands is a trigger that requires environmental disclosure. An EIS-level analysis was conducted because, in accordance with HAR Section 11-200.1-14(d)(2), the accepting authority (Hawai'i Department of Land and Natural Resources) determined that the Army's proposed action may have a significant effect.

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

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

A-4. The proposed action is to retain up to approximately 22,750 acres of the 23,000 acres of state-owned land at PTA to support continued military training. The Army would retain the state-owned land prior to the 2029 expiration of the lease to limit impacts on training. Alternatives considered in the Final EIS were: 1) Maximum Retention (of approximately 22,750 acres); 2) Modified Retention (of approximately 19,700 acres); 3) Minimum Retention and Access (of approximately 10,100 acres and 11 miles of roads and training trails); and 4) the No Action Alternative, under which the Army's and other DoD components' use of the State-owned land would cease altogether when the lease expires in 2029.

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

A-5. The purpose of the proposed action is to enable USARHAW to continue to conduct military training on the state-owned land at PTA to meet USARHAW's ongoing training requirements. The proposed action is needed to preserve limited maneuver area, provide austere-environment training, enable access among major parcels of U.S. Government-owned land at PTA, retain substantial infrastructure investments, allow for future facility and infrastructure modernization (which is not currently planned and would require separate, future NEPA analysis), and maximize use of the impact area in support of USARHAW-coordinated training.

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

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

The Final EIS 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 greenhouse gases and environmental justice was already provided to the public for

comment in the Second Draft EIS, such analysis was included in the Final EIS for transparency and continuity.

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

A-7. Native Hawaiian Organizations, federal, state, and local agencies and officials, and other interested organizations and individuals were invited to participate in the public comment periods throughout the EIS process. The public comment process began with a 40-day scoping period from September 4, 2020, to October 14, 2020. On April 8, 2022, the Army published the Notice of Availability (NOA) for the Draft EIS, which started the 60-day public comment period that ended on June 7, 2022. On April 19, 2024, the Army published the NOA for the Second Draft EIS. The 45-day public comment period for the Second Draft ended on June 7, 2024. Throughout the EIS process, the Army conducted community outreach as part of the Army Land Retention Program and other activities.

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

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

Q-9. What alternative did the Army select?

A-9. The Army identified Alternative 2, Modified Retention (the preferred alternative in the Final EIS), as the selected alternative.

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

A-10. The Army's decision to select Alternative 2 was based on consideration of the results of the analysis in the Final EIS, comments provided during the public comment and review period, Army mission requirements, and an evaluation of the ability of each alternative to meet the purpose of and need for the proposed action.

Q-11. What resources may be significantly impacted by implementation of the selected alternative?

A-11. The Final EIS indicated that under Alternative 2, significant adverse impacts on land use (land tenure), biological resources, cultural practices, and environmental justice could occur.

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

A-12. To reduce adverse impacts, the Army will: 1) develop a formalized access plan for quarterly access for Native Hawaiian Organizations, individuals, and consulting parties, 'ohana, lineal descendants, and cultural practitioners; and 2) install interpretive

panels at the Gilbert Kahele Recreational Area. The Army will also: 1) negotiate an agreement with the State to allow the Army to monitor for wildfires on the State-owned land that the Army does not retain; and 2) in addition to the current thermal technology, install advanced technology that will include additional thermal technology equipment that will enable firefighting personnel to locate and eliminate hotspots where a fire persists. Finally, the Army will: 1) conduct a multi-year research project to identify possible biological controls to address invasive *Cenchrus setaceus* (fountain grass); 2) conduct an invertebrate study; and 3) conduct a study to assess ungulates' impact on the health of the vegetation community.

The Army will begin implementation of the mitigation measures no later than October 2028. Should funding be available prior to fiscal year 2029, mitigation measures and mitigation monitoring will be implemented prior to October 2028 as funding becomes available.

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

A-13. Now that the ROD has been published, the Army will negotiate with the State regarding the most appropriate land retention method(s) for the 19,700 acres the Army will seek to retain.

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

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

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

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