INDIVIDUALS

Letter I1 | **Comments** | **Responses**

10/6/05

Mr. Gary ShiraKata
U.S. Army Corp of Engineering
Honolulu Engineer District Bldg 230
Fort Shafter, Hi 96858-5440

Re: MaKua Military Reservation Draft Enviromental Impact statement

Please make the following corrections to the following transcripts:

William Aila, 8/23/05
Pg 21 line 20, 21, and 23 change Kaumualii to Kamohoalii
Pg. 22 line 1 change promoted to practiced
Pg. 24 line 25 add not after IPs so it reads It's not
Pg. 27 line 2 change value to valley

William Aila 8/25/05
Pg. 70 line 21 change discussion to discretion
Pg. 71 line 14 change discussion to discretion

William Aila 8/27/05
Pg. 72 line 9 change leapt to left
Pg. 72 line 16 remove the period, add in C ridg

Melva Aila 8/27/05
Pg. 50 line 5 change neeling to healing
Pg. 50 line 7 change is to its
Pg. 50 line 18 change participant to practitioner

Comments

Pg. 2 Makua EIS testimony
Mr. Gary Shirakata

The following portions of the Makua Military Reservation draft Enforcement Impact statement are deficient and therefore result in a deficient DEIS.

I1-1

1. The Final Report, Cultural Impacts on Traditional Cultural Properties from continued Military use of U.S. Army Makua Military Reservation, Wai'anae, Oahu Island, Hawaii is deficient because the questionaire used for the cultural Impact Assessment was found to be offensive to the majority of the people in Wai'anae who looked at it. The questions regarding geneology were especially offensi Therefore a significant portion of cultura practitioners refused to complete the questionaire. We had suggested that the contractor revise the questionaire and offered to assist in the revision process. No one followed up on our offer.
In the report it refers to a group called Ka Wahipana o Makua. The correct name for this group is the Ukakipo Council.

Responses

I1-1
Members of both Malama Makua and Hui Malama Makua were given an opportunity to fill out the questionnaire for the cultural impact assessment and were also given an opportunity to revise the questionnaire when a member of the Hui objected to the tone of the questions; a revised questionnaire was received from William Aila after the report had been prepared. The questionnaires for the cultural impact assessment were advertised in the Waianae newspapers, were made available at the Waianae public library (200 copies), and were distributed to members of the public. If there was a separate questionnaire from outside the Army, no member of the public has provided that questionnaire to the Army.

Comments

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Pg.3 - Makua EIS testimony

O Wahipana O Makua simply refers to the sacred place of Makua. It appears the author of the report couldn't understand the simple concept. This is reflective of the authors lack of understanding of the Wai'anae Community The inability of the author to gather cultural information is a reflection of the Army's inability to communicate effectively with the community resulting in a study that is flawed. This study was then included in the DEIS, making the DEIS flawed and inadequate.

The DEIS is also inadequate for the following reasons:

I1-2 • It has not, demonstrated any connectivity between the Makua DEIS and the Stryker DEIS and any impacts between the two proposed activity.

I1-3 • The use of Stryker vehicles in Makua Valley was never discussed in the Stryker Programmatic EIS, the Stryker transformation EIS, and the MAKUA DEIS.

Responses

I1-2
MMR is important to military training in Hawaii, and thus SBCT forces would use MMR if the ranges were available after completion of the MMR Final EIS and ROD. The SBCT EIS, Chapter 2 (page 2-43), section on Combined Live-Fire Maneuver Training, addresses how SBCT forces would conduct dismounted training to include company-level CALFEXs. The MMR EIS contains an analysis of the potential environmental impacts associated with dismounted CALFEXs for current forces and the SBCT (see Chapter 5). Two separate EIS were prepared for training at MMR and for SBCT transformation.

I1-3
The SBCT EIS, Chapter 2 (page 2-43), section on Combined Live-Fire Maneuver Training, addresses how SBCT forces would conduct dismounted training to include company-level CALFEXs. The MMR EIS contains an analysis of the potential environmental impacts associated with dismounted CALFEXs (see Chapter 5). The Programmatic Environmental Impact Statement (PEIS) addressed the environmental concerns which may affect various aspects of Army Transformation including, but not limited to: unit location; material acquisition and testing; training areas; range requirements; and strategic requirements. The use of Stryker at Makua is now addressed in this EIS.

Comments

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Page 4- Makua ~~EIS~~ testimony

I1-4
- The level of discretion given to the commanding General of the Pacific, regarding what qualifies as qualified training is not disclosed in the Makua DEIS. Therefore a complete analysis of adequate alternatives was not presented, and all reasonable alternatives were not considered.

I1-5
- There is no financial analyst of the proposed alternatives, including alternatives that could be available if the level of discretion by the Commanding General as stated above was known.

I1-6
- There is no analysis of conducting the proposed training at Schofield, Pohakuloa, or any other location, other than Makua.

I1-7
- The conditions of surface and sub surface archeology is unknown because the Army has failed to complete surface and sub surface assessments of Hawaiian Cultural sites as stipulated in the Settlement Agreement with Malama Makua.

Responses

I1-4
The EIS considered other alternatives in Section 2.5. The EIS now includes evaluation of an alternative in which training proposed for MMR would be conducted at the Pohakuloa Training Area, island of Hawaii (See Chapter 2 for a description of this alternative). This alternative was added in response to public comments received on the Draft EIS. Use of MMR, however, remains the preferred alternative.

I1-5
The EIS was prepared in accordance with the National Environmental Policy Act and with applicable federal and Army regulations. Review of the Draft EIS by the US Environmental Protection Agency found the document to be adequate. The alternatives considered in the EIS, both those evaluated in detail and those eliminated from further analysis, were analyzed based on their ability to achieve the proposed action and meet the purpose and need.

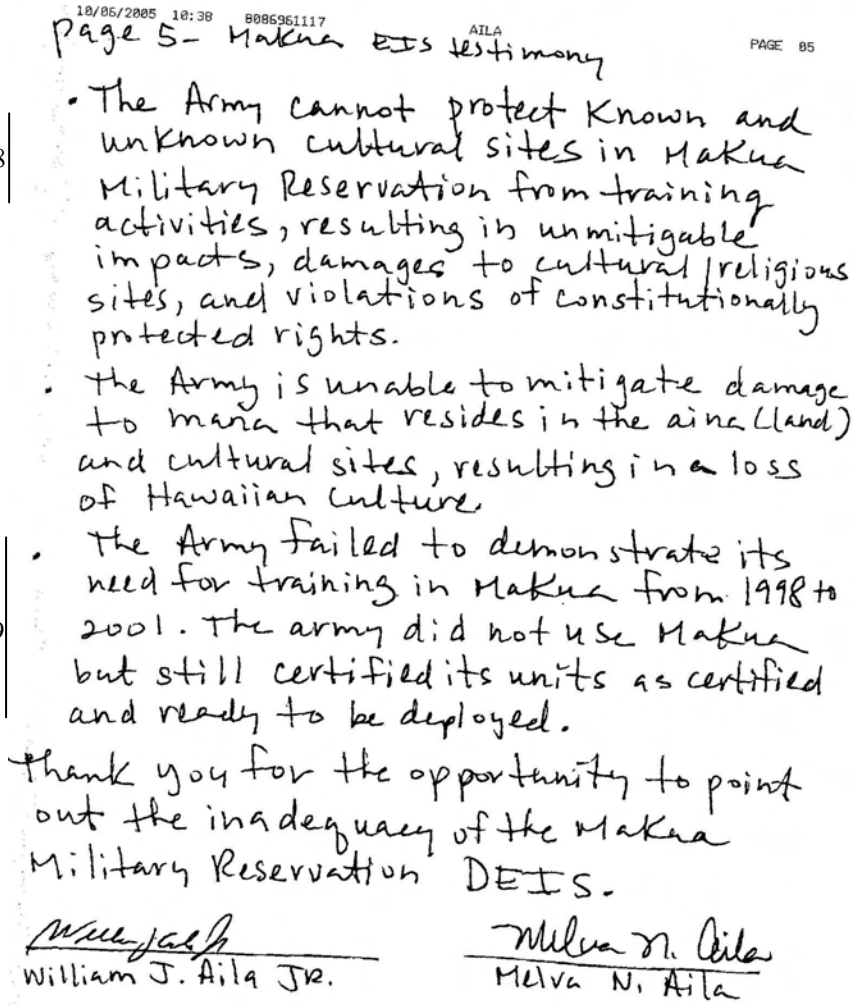
Cost considerations would be a factor in the final decision.

I1-6
The EIS considered other alternatives in Section 2.5. The EIS now includes evaluation of an alternative in which training proposed for MMR would be conducted at the Pohakuloa Training Area, island of Hawaii (See Chapter 2 for a description of this alternative). This alternative was added in response to public comments received on the Draft EIS. Use of MMR, however, remains the preferred alternative.

I1-7
Surface surveys have been completed for the entire area within the south firebreak road except for those areas containing improved conventional munitions. Surface surveys have also been undertaken for the majority of the surface danger zone of the 105mm round. Surface surveys have also been undertaken for the Ukanipo Heiau complex, Koiahi Gulch and almost all of Kahanahaiki Valley. This coverage is reflected in Figures 3-24 and 3-25 in the Draft EIS.

Comments	Responses
	I1-7 Subsurface testing has been undertaken in Sites 4243, 4244, 4245 and 4246. This testing showed there is a subsurface component to these sites; however, this limited testing resulted in protests from two Native Hawaiians due to the invasive and destructive nature of the testing. An additional subsurface archaeological survey was conducted in November and December of 2006. The results of this survey have been incorporated into Section 3.10, and the survey report is included as Appendix G-9. The Army has completed all surface and subsurface archaeological surveys consistent with NEPA and the settlement agreements with Malama Makua.

Comments



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Page 5- Makua EIS testimony

- The Army cannot protect known and unknown cultural sites in Makua Military Reservation from training activities, resulting in unmitigable impacts, damages to cultural/religious sites, and violations of constitutionally protected rights.
- The Army is unable to mitigate damage to mana that resides in the aina (land) and cultural sites, resulting in a loss of Hawaiian culture.
- The Army failed to demonstrate its need for training in Makua from 1998 to 2001. The army did not use Makua but still certified its units as certified and ready to be deployed.

Thank you for the opportunity to point out the inadequacy of the Makua Military Reservation DEIS.

William J. Aila JR.

Melva N. Aila

I1-8

I1-9

Responses

I1-8
The Army makes every required effort to protect cultural sites at MMR through site protection measures, avoidance, changes to training scenarios and the realignment of SDZs.

I1-9
Training requirements are constantly changing based on lessons learned in combat, training events, new equipment, and new commanders. Using historical data to assess future needs is faulty logic. Times of war, such as now, drastically change training requirements. While units have been assessed in the past as ready for combat without conducting live-fire training exercises at MMR, the Army was forced to undertake training work-arounds to include training at locations outside of the state of Hawaii. These work arounds were both time consuming and costly. Additionally, the lack of home-based live-fire training capability has an impact on Soldier morale as more time is spent away from family, which is not quantifiable in Unit Status Reports.

Letter I2

Comments

Julie-Ann Cachola
86-062 Hoaha Street, Wai'anae, Hawai'i 96792
(808) 696-5885 email: jcachola@hawaii.rr.com

October 6, 2005

Mr. Gary Shirakata
U.S. Army Corps of Engineers
Honolulu Engineer District, Building 230
Fort Shafter, HI 96858-5440

Aloha Mr. Shirakata:

Thank you for this opportunity to comment on the Draft Environmental Impact Statement (DEIS) for Military Training Activities at Mākua Military Reservation (MMR). In addition to this written testimony, I submitted oral testimony at the August 27, 2005 public hearing conducted at the Wai'anae District Park. Unaware of the time constraints imposed at the hearing, I was not able to address all of my concerns, so I appreciate this opportunity to clarify and expand upon my brief oral testimony.

Personal Background and Foreword

I submit these comments as a concerned life-long resident of the Wai'anae Coast, and as a professional land use planner. I have a Master's Degree in Urban and Regional Planning from the University of Hawai'i, Mānoa, and have been reviewing planning documents and preparing plans since 1986. I have worked as a State planner and have also worked as a planning consultant for Hawaiian communities and have addressed numerous Hawaiian issues from a consensus-building perspective, for the past 15 years. I am now employed as a planner in a small, local private planning firm. It might help to mention that I received my Bachelor of Arts Degree from Pomona College, majoring in Sociology which allowed me to focus four years on a deep analysis of the "Hawaiian Movement," from various disciplines and perspectives.

I2-1 In summary, my testimony identifies a number of inadequacies in the DEIS that I believe, warrant significant re-drafting, perhaps even a re-scoping of certain work elements in order to develop a FEIS that is in compliance with federal rules and regulations governing the preparation and acceptance of the FEIS. In addition, while I try to limit my comments to items pertinent to the revision and completion of a Final EIS (FEIS), I am ultimately a problem-solver. More often than not, problem-solving requires a "step back" in order to see the "big

Responses

I2-1
The EIS was prepared in accordance with the National Environmental Policy Act with applicable federal and Army regulations. Review of the Draft EIS by the US Environmental Protection Agency found the document to be adequate.

Comments

picture." As a result, there are some comments that may not be directly related to the finer points of DEIS compliance with governing rules and regulations. However, I offer them in hopes of lending a perspective that may help decision-makers in their quest to develop a military training area while maintaining, and possibly solidifying, future amicable relations between the military and the resident population, in particular, the Hawaiian community. While the military prepares to accommodate the Stryker Brigade, the Hawaiian community prepares for self-governance. If key decision-makers do not keep an eye on this "big picture," I fear tumultuous times. I'm hoping that caring hearts and sharp minds will see the necessity to chart a long-term course, rather than solely focusing on a short-term project.

I2-2 Technical Studies Require Further Review After Appropriate Alternatives are Identified

I2-2 While my review of a DEIS usually focuses on the adequacy of the technical studies, in this case, there are glaring inadequacies in the framing of the proposed action and the identification of alternatives that do not comply with the spirit, intent, and directives relating to the preparation of the DEIS. As such, the validity, methodology, and results of the technical studies are secondary considerations that may warrant deeper analysis at some point in the future.

I2-3 The DEIS Fails to Serve its Intended Purpose of Providing Reasonable Alternatives to Inform Decision-Makers

The DEIS was prepared pursuant to Section 102(2)(c) of the National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality (CEQ) regulations (40 CFR parts 1500-1508), Environmental Analysis of Army Actions (32 CFR 651), and the Settlement Agreement and Stipulated Order between Mālama Mākua and the U.S. Department of Defense. CEQ regulations identify the primary purpose of an EIS as:

> "… an action-forcing device to insure that the policies and goals defined in the Act [NEPA] are infused into the ongoing programs and actions of the Federal Government. It shall provide full and fair discussion of significant environmental impacts and ***shall inform decision makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the***

Responses

I2-2
The EIS was prepared in accordance with the National Environmental Policy Act with applicable federal and Army regulations. Review of the Draft EIS by the US Environmental Protection Agency found the document to be adequate.

The EIS considered other alternatives in Section 2.5. The EIS now includes evaluation of an alternative in which training proposed for MMR would be conducted at the Pohakuloa Training Area, island of Hawaii (See Chapter 2 for a description of this alternative). This alternative was added in response to public comments received on the Draft EIS. Use of MMR, however, remains the preferred alternative.

I2-3
The EIS considered other alternatives in Section 2.5. The EIS now includes evaluation of an alternative in which training proposed for MMR would be conducted at the Pohakuloa Training Area, island of Hawaii (See Chapter 2 for a description of this alternative). This alternative was added in response to public comments received on the Draft EIS. Use of MMR, however, remains the preferred alternative.

Comments

> ***quality of the human environment***…[the EIS is] "more than a disclosure document. It shall be used by Federal officials in conjunction with other relevant material to plan actions and make decisions." (CEQ, Sec. 1502.1 Purpose)

The regulations clearly state that the EIS

> "***shall serve as the means of assessing the environmental impact of proposed agency actions, rather than justifying decisions already made.***" (CEQ, Sec. 1502.2(g) Implementation)

In spite of these clear directives, and in spite of the impressive record of the Army's technical consultant, Tetra Tech, cited as the largest firm in the area of site assessment/compliance, the DEIS blatantly ignores the requirement of identifying reasonable alternatives. I2-3

I2-4 The Proposed Action is Inadequate

The DEIS includes the location of Mäkua in its definition of the proposed action. By framing the proposed action in this way, it categorically excludes further discussion and analysis of other potential training areas. While EISs are often justified in confining analysis to a specific site, primarily due to land tenure patterns, in this case, in the context of locating a military training area of the scale and magnitude being proposed, and in consideration of the vast amount of acreage under the management jurisdiction of the federal government, a fair and full discussion of different site alternatives, is the only "reasonable" approach to take. I2-4 I2-5

In order to identify reasonable alternatives, the Proposed Action needs to be revised. As currently drafted, the Proposed Action does not identify clear project specifications, leaving so many undefined variables that the reader/decision-maker has little means from which to analyze the pros and cons of different alternatives. I2-4

For analytical purposes, I have "marked-up" the Proposed Action below. In order to address the foregoing point of providing a full discussion of different site alternatives, the words "at MMR" should be deleted. This will allow other candidate sites to be evaluated which will ensure that I2-4

Responses

I2-4
As the lead agency, the Army has the discretion to define its proposed action, as well as the purpose and need for that proposed action. The EIS was prepared in accordance with the National Environmental Policy Act and with applicable federal and Army regulations. Review of the Draft EIS by the US Environmental Protection Agency found the document to be adequate.

I2-5
The EIS considered other alternatives in Section 2.5. The EIS now includes evaluation of an alternative in which training proposed for MMR would be conducted at the Pohakuloa Training Area, island of Hawaii (See Chapter 2 for a description of this alternative). This alternative was added in response to public comments received on the Draft EIS. Use of MMR, however, remains the preferred alternative.

I2-6
Chapter 2 describes the proposed action. See response to I2-5 for an explanation of a PTA alternative.

I2-7
The EIS is not intended to make value determinations, such as whether one alternative is better than another. To facilitate comprehension by the public, the Draft EIS included an executive summary, tables that provide concise data on the project and resources, and summary tables that provide brief overviews of the expected impacts. The Army has also funded technical experts to provide the community with the support needed to understand the technical issues associated with this project and to provide substantive input into the impact analysis process.

Comments

benefits/opportunities are maximized and adverse impacts are minimized.

"The Proposed Action is conducting the **necessary** type, level, duration, and intensity of live-fire and **other** military training exercises ~~[at MMR]~~ for the combat units assigned to the 25th IND(L) and for **other** military units to maintain combat readiness of those units."

I2-6

The boldfaced, underlined items are variables that should be specifically identified/quantified in order to ensure that the objectives of the project are met. As currently drafted, how could anyone determine whether one alternative is better than another? The Proposed Action should define the type, level, duration, and intensity of live-fire and other specifically defined military training exercises that are "necessary." As currently drafted, the specifications are inappropriately identified as descriptions of various alternatives, which again, cannot be analyzed because there is no standard, or criteria, presented. The implication is that "more" is "better," but the pertinent question is, what is "necessary"?

I2-7

I2-8

The Proposed Action should also identify what "other" military units require the training area to maintain combat readiness. This should be documented in the Appendix with correspondence from those military units that clearly specify their needs. As currently drafted, it is not clear what these "other" military units need. Moreover, it is not clear whether the "other" units truly do need such a training area. If the Stryker Brigade is going to use the training area, then it should be identified as one of the "other" military units that require use of the training area. This again, should be accompanied with correspondence indicating their needs.

I2-9

I2-9

I2-10

The definition of the Proposed Action in the DEIS and subsequent categorical exclusion of alternate sites was a short-cut gamble. It's not going to work here. The U.S. Army needs to take the proper approach on this issue. There is simply too much at stake. The community, myself included, look forward to seeing this glaring deficiency corrected in the FEIS.

I2-4

I2-11

The FEIS Needs to identify Alternate Sites for the Training Area

Responses

I2-8
Section 2.4.3 of the Draft EIS described in detail an example company-level CALFEX, which is the highest intensity level of training that would occur at MMR. Due to the nature of training range operations, the exact mix of training activities that would occur from year to year would vary, but those activities would encompass the company-level CALFEX and other training exercises described in Section 2.4.

I2-9
The level of training proposed in the Draft EIS would meet the training needs of the 25th ID and the US Marine Corps. As stated in Section 2.4.1 of the Draft EIS, In the Marine Corps, Navy, Coast Guard, Army Reserve, and Hawai'i Army National Guard have trained at MMR in the past. US military units and those from other countries would use MMR this training resource from time to time and would be limited to a company-level CALFEX as the maximum level of training and would be required to adhere to the same MMR-specific training constraints as the Army.

I2-10
Like any other unit, the Stryker Brigade Combat Team forces would have access to MMR for training, as discussed in Section 2.2. Those forces would be subject to the constraints and limitations that apply to all units using MMR. The Stryker vehicles would not be used for off-road maneuvers and will remain on existing trails, except for access to approved firing positions.

I2-11
The EIS considered other alternatives in Section 2.5. The EIS now includes evaluation of an alternative in which training proposed for MMR would be conducted at the Pohakuloa Training Area, island of Hawaii (See Chapter 2 for a description of this alternative). This alternative was added in response to public comments received on the Draft EIS. Use of MMR, however, remains the preferred alternative.

Comments

I2-12 In the absence of site alternatives, the DEIS is inherently flawed and is not in compliance with governing rules and regulations. As explained above, the EIS is intended to serve as a decision-making tool, BEFORE decisions are made. It is not meant to justify a decision that has already been made. The
I2-12 decision to locate the training area at Mākua is already made. In the context of the "big picture," the farce of Alternatives 1, 2, and 3 insults the intelligence of the scrutinizing public, and I would hope, the contractor, as well. The alternatives include the standard "do nothing" alternative, along with three other alternatives that are simply variations of the same
I2-12 alternative. The variations among the alternatives identify different degrees of destruction associated with the deployment of different weapons. ALL alternatives identify only one site: Mākua.

However, there is nothing intrinsic to Mākua that makes it uniquely "qualified" as a training area. A basic list of site requirements is masked under the heading of the "Need for the Proposed Action," which only underscores the extreme bias that
I2-13 the entire document is built upon. The "need" statements are short-sighted attempts at justifying the pre-selection of Mākua as the ONLY site that can accommodate the level of training activities that are "required" of each infantry company.

I2-14 Site Criteria should be Identified and Applied to Site Alternatives

The need statements essentially identify site criteria. Site criteria identify specifications that can be compared across all alternatives in order to inform decision-makers on the pros and cons of each alternative relative to site specifications. Site criteria help to focus analysis and discussion on the needs of the project and provide an analytical framework that can maximize benefits and minimize adverse impacts. They help to identify and evaluate reasonable alternatives, which would bring compliance with federal rules and regulations governing EISs.

A closer examination reveals that the optimal site for the proposed training activities would only have to meet the following two (2) site requirements:

I2-14

1. At least 1,137 acres of contiguous land, managed by the federal government (adequate acreage), with appropriate buffer areas as required.

Responses

I2-12
Please see response to comment I2-11

I2-13
Please see response to comment I2-11

I2-14
Please see response to comment I2-11

Comments

I2-14 2. Close proximity to Schofield Barracks to ensure that the time spent transporting companies to and from the training area does not prevent the units from completing other training and operational requirements.

I would include additional site criteria, for instance:

I2-14 3. A site that is NOT in close proximity to a highly populated, economically-depressed, urban area. It should be a site that is located far from the resident/host, civilian population.

I2-14 4. A site that does not have historical significance as a rallying point for the Hawaiian Renaissance and/or Hawaiian Sovereignty Movement. The situation is potentially volatile. Site selection for live-fire military training has the potential to erupt as a race/class issue or as an issue involving military occupation of prime Hawaiian lands

I2-14 5. A site containing ample buffer areas, aided by the topography of the land (e.g., natural depressions, hills, etc.) that can keep military training activities separate and distant from the scrutiny of a discerning public. In other words, a site that will not work against the U.S. military in terms of its public image and will not further erode public support for military operations in Hawai'i.

I2-15 Mākua Does Not Meet and of the Site Criteria

I2-15 Armed with these site criteria, we can look objectively at Mākua. While the DEIS states that Mākua meets the acreage requirement of 1,137 acres, all GIS layers I checked does not indicate federal government lands in Mākua. The U.S. government only manages small parcels of land at Mākua which total approximately 170 acres. The bulk of the lands included in MMR are State lands under a revocable permit to the federal government. So technically, Mākua would not enter into the sites for consideration since it is not federally-owned lands.

I2-15 Furthermore, it is not in close proximity to Schofield Barracks. The transport of troops, equipment, and live ammunition would have to traverse one-lane roads for much of the distance. It would take at least 1 hour to travel the entire distant. Furthermore, the travel route passes through

Responses

I2-15
The Army manages the entire 4,190 acres of MMR (reference Section 3.1.2). The land ownership interests at MMR are considered adequate for the purpose and need described in the EIS.

Comments

I2-15 Farrington Highway, which is already very over-burdened by traffic. Even if times of travel were limited as described in the DEIS, traffic will result. The best time to travel would be on a weeknight between 1:00 am and 4:00 am.

I2-15 If we were to consider the other added criteria, Mäkua would fall to the last on the list of candidate sites. It is located in a predominantly Hawaiian community—in the Wai'anae Census County Division (Nänäkuli to Mäkua) where 22.9% of the population is native Hawaiian compared to the rest of island, which is comprised of 5.6% native Hawaiians. If fact, you couldn't have selected a more inappropriate site for live-fire training activities. Since as long as I can remember, Mäkua has been a cultural icon, where native Hawaiians, once "squatters" on their own land, were evicted, handcuffed, and arrested. People still remember this. As the sovereignty movement

I2-16 continues to gain momentum, Mäkua will certainly be a land area that will be targeted for return. How is it in the Army's best interest to exacerbate an already tenuous situation??? Especially if there are other more appropriate sites.

I2-17 Other Sites Meet the Site Criteria

I2-17 A cursory GIS analysis indicates that the federal government currently manages approximately 15% of the island of O'ahu. If we apply the first criteria, we find 17 parcels across the State that include over 1,137 acres; 10 of those parcels are on the island of O'ahu. If we eliminate the parcels in predominantly urban areas, we find 4 parcels that would qualify. This means that at least 4 viable site alternatives exist on the island of O'ahu. All the parcels are closer to Schofield Barracks than Mäkua. Some of the parcels have been used for military training in the past.

I2-18 The U.S. Military should be focused on Building Relationships with the Hawaiian Community

I2-18 If, indeed, the U.S. Military and the high command in charge of making decisions surrounding the future use of Hawai'i lands for live-fire training, is truly interested in working with the community to address community concerns, then the scope of the EIS must be expanded to include a full and fair discussion of other viable sites. Additional site criteria should be identified that address the real issues here-- head-

I2-18 on. If community-military relations is to improve in Hawai'i, the military must break through many "walls" that have been constructed for good reason. One part of breaking down those

Responses

I2-16
The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.

I2-17
The EIS has been revised to address an alternative involving acquiring land and constructing a new training facility in Section 2.5.6.

I2-18
Section 2.5 of the EIS has been revised to address construction of replacement training facilities.

The EIS considered other alternatives in Section 2.5. The EIS now includes evaluation of an alternative in which training proposed for MMR would be conducted at the Pohakuloa Training Area, island of Hawaii (See Chapter 2 for a description of this alternative). This alternative was added in responses received from public meetings and input received during the public comment period on the Draft MMR EIS (Reference Section 1.7 for a full description of the scoping process and subsequent public involvement). Nevertheless, use of MMR remains the preferred alternative.

Comments

"walls" will be the honest discussion and disclosure of what's really at stake here.

The public is informed, attentive, and very concerned. They are no longer restrained by humility and paternalism. The public can speak from all perspectives (cultural, spiritual, environmental, archaeological), and from all professional disciplines. Community residents can speak from their own experiences in the military when training was conducted successfully at other sites in Hawai'i. Never at Mākua. They bring wisdom and command respect as kūpuna (elders); they bring real concerns as mākua (parents) trying desperately to provide a better future for their children, against all odds. They bring hopes and aspirations of wide-eyed ʻōpio (youth), who have never experienced the scars of warfare, because isn't war just like a video game???

As historically disadvantaged, oppressed Hawaiians have made in-roads into the mainstream culture, we have gained a precious perspective on our culture, history, and therefore, our future. He Hawai'i Au, Mau a Mau (I am Hawaiian now, and forever). If the military wants to remain in Hawai'i, roaming freely on Hawaiian lands, now is the time, and Mākua is the opportunity, to forge a new relationship with the Hawaiian community—one that can endure the changing times of this epoch.

I2-19 The Proposed Action at Mākua is a Bad Idea

With all the "intelligence" available to the military, why have they not come to the same obvious conclusion? Who among your rank and command thought it was a good idea to focus an onslaught of hundreds of soldiers, an arsenal of weapons, including the latest and greatest live-fire weapons, fleets of transport vehicles, truckloads of operations equipment, and the Stryker Brigade (!)—all that will descend by day or night, from the land, sea, and air-- for 242 days of each year, or approximately 5 days a week (!) in a location that serves as the spiritual and recreational center for the most predominant Hawaiian community on this island???

I2-19 Who thought this was a good idea? Who still thinks this is a good idea? I ask because these people are doing the military in Hawai'i a great disservice. Instead of capitalizing on gains in public support for military operations, given recent terrorist acts; instead of capitalizing on unprecedented natural

I2-20 resource management collaboration to stabilize and promulgate native species in danger of extinction—instead of strategizing a

Responses

I2-19
The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.

I2-20
The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.

Comments

I2-20 win-win situation, these people have decided, unilaterally, to assert an act of war upon their neighbors…their hosts. Pounds of paper serve as weapons of intimidation; constrained deadlines hidden under a mask of open public hearings - the only venue we have to air our concerns and garner community solidarity—is conveniently limited to a few precious minutes. Armed with technicians that can counter any technical argument raised and buffered by the gracious presence of known and respected Hawaiian, female, facilitators, these people seek a short-sighted view. Not worthy of "vision," these people lack skills of problem-solving, lack an understanding of context and have no peripheral vision. Or if they do, then they lack the individual fortitude to stand up to say, "this is a bad idea."

As an optimist, I submit that there must be one among you that have been trained to think creatively, to strategize from all angles, to forge successes, not failures—there must be one among you that has enough honor, respect, and love for the U.S. Flag and all that it stands for—that is brave enough to stand apart in order to develop a better approach that can produce positive outcomes, now and in the future.

We are currently in a significant historic nexus. Native Hawaiian entitlements continue to be challenged, which has brought national and international attention to the facts surrounding the illegal overthrow of the Kingdom of Hawai'i. It has galvanized the Hawaiian community in support of current efforts at reconciliation, focused on restoring some form of Hawaiian self-governance. How will the outcome of pending federal legislation affect the military in Hawai'i? How will it affect the land base currently under the management jurisdiction of the federal government? The DEIS does not recognize these
I2-21 important issues that would have a direct bearing on the future use of Mākua, or any other site in Hawai'i. This is an appropriate area for a "technical study."

Conclusion

Based on my review of the Executive Summary of the DEIS, as well as years of working with similar EIS documents, it is clear that the DEIS fails to address its primary purpose. The DEIS does not meet preparation requirements of either the NEPA and in particular, the CEQ regulations contained in parts 1500 to 1508.
I2-22 I look forward to a significant revision in the Final EIS.

Sincerely,

Responses

I2-21
The Army thanks you for your comment and appreciates your participation in this public review process. Your comment has been considered and has been included as part of the administrative record for this process.

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Comments	Responses
J. Cachola *Page* 10 Julie-Ann Cachola	