

Comments**Responses**

I5-5

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.

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.

I5-6

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).

Comments

TO: Army core of Engineers—page 2

From: Fred Dodge, MD



RE: Makua Draft EIS

DATE: October 6, 2005

- I5-7 | 5. The final report “Cultural Impacts on Traditional Cultural Properties form
- I5-8 | continued military use of U.S. Army Makua Military Reservation, Wai’anae,
- I5-9 | Oahu Island, Hawaii” is incorrect and incomplete. The Malama Makua Board
- I5-10 | was never formally notified, certainly not by letter. Apparently one or two
- I5-11 | members were informally handed a questionnaire, and responded that the
- I5-11 | questionnaire was insensitive and the motives behind the questionnaire appeared
- I5-11 | suspect. We know of no formal written request for us to reword these questions.
- I5-11 | In addition that is the Army’s (or grantee’s) responsibility. We are not
- I5-11 | responsible for a flawed study or miscommunications. As a member of the Board
- I5-11 | of Malama Makua, I never received any phone calls, e-mails, etc regarding this.

- I5-11 | 6. The same report mentioned under #5 also mentions “...the board of Ka Wahipana
- I5-11 | O Makua...” Everyone I’ve talked with has never heard of this name, including
- I5-11 | Dr. Laurie Lucking. This report is strange to say the least. It needs to be done
- I5-11 | over again—and done properly.

Responses

I5-7

The Army sent cultural impact assessment survey forms to the public, distributed copies at public meetings, deposited copies at public libraries, and posted notices on public notice boards in the Waianae community. The Army notified interested members of the community that it would consider proposed revisions; however, none were received. The Army will continue to consult with Native Hawaiians having lineal and/or cultural ties to Makua who wish to work with us in the identification, determination of significance and evaluation of sites at Makua.

I5-8

See response to Comment I5-7.

I5-9

See response to Comment I5-7.

I5-10

See response to Comment I5-7.

I5-11

The referenced text could not be found in the Draft EIS.

Comments

Response to the EIS re the Military use of
Makua Valley
Section relating to Socioeconomic/ Environmental Justice

The EIS uses Honolulu County data to describe socioeconomic and environmental justice issues. Honolulu County encompasses the whole island with all its various communities. According to the EIS this was done because this is how data relating to economic activities are collected and compiled (Vol I p. 3-242).

The EIS further goes on to state that the income in the region of influence (ROI) that we are concerned about is \$29,000 per capita personal income (PCPI). And that this PCPI exceeds the state and national per capita personal income (Vol I p. 3-242).

I5-12| This is so inappropriate and incorrect that it is outrageous !

In fact, if a serious and concerted effort were made, there is data about the Wai'anae area census tracts in the Census 2000, at the University of Hawaii, and at the Hawaii State Government. There are also private foundations and entities that have relevant data. . There is data about Wai'anae at the Wai'anae Comprehensive Health Center. It's probable that other private nonprofit entities in Wai'anae have data. Wai'anae has been so studied and written up by outside students of various professions that about 10 years ago the community got fed up that it was being studied so much.

Here is some data obtained from the Census 2000 and the State Government of Hawaii relating to Wai'anae that I obtained with the assistance of our state legislator. All of it came from the University of Hawaii website for the Center on the Family. (<http://uhfamily.hawaii.edu/Cof-Data/profiles>)

The average PCPI in Wai'anae is \$13,613. The percent of persons receiving Temporary Assistance to Needy Families (TANF) is 23.4% as compared to 5% for Honolulu County. The percent of persons receiving Food Stamps in the Wai'anae area is 51% as compared to 12.2% in the Honolulu County. Unemployment is nearly 15% as compared to 5% in Honolulu County. Children living in poverty is 32.8% as compared to 13.6 % for Honolulu.

Those of us who live in Wai'anae think these statistics are actually too low. The socioeconomic conditions for many if not a majority, of local Wai'anae people are actually worse. Rents and home prices are so high that many of our friends face homelessness or being forced to live with already crowded families. What's most difficult is the drug epidemic, the violence, and continuing poverty. Those of us who live here don't deny these problems—we work to solve them. But over and above and more importantly than this, is that Wai'anae is still a unique and precious place—with a living Hawaiian culture, aloha, humbleness, generosity, a community that values the hula, the making of leis, the ocean, the mountains, the rocks, our beautiful children and helping

Responses

I5-12

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

each other to make something. This is the Wai'anae whose health we are fighting for - whose water, air and environment we want to preserve and to restore.

According to the EIS, the Wai'anae CCD has a poverty level of 21.8%. It also has the highest proportion of Native Hawaiians and other Pacific Islanders in the state at 28.7% vs 9.4%. As such, Wai'anae qualifies for consideration as a "potential Environmental Justice population, subject to the provisions of Executive Order 12898. This Executive Order requires federal programs " to identify and address disproportionately high and adverse health and environmental effects of its programs on minority and low income communities and to identify alternatives"(Vol. p. 3-244).

The EIS looked briefly at alternatives to the use of Makua. There is a short list of alternatives that were considered but eliminated without discussion, in the EIS. There is no explanation why with all the large military landholdings on Oahu alone, none were seriously considered, even when all these holdings except Helemano (which is close) are contiguous to Schofield. This is not to suggest that military training be anywhere in Hawaii—it is only to point out that **no serious attempt** was made to identify an alternative to Makua. Further, Hawaii is but a speck compared to the vastness of the United States continent -- is it justice to rocket bomb, blast, shoot, tear, and burn a sacred valley here in the neighborhood of one of the poorest, yet most native populations in Hawaii? Here in one of the most beautiful places on earth?

The military first started using Makua Valley with its emplacements for howitzers in the 1920s. It is now 85 years later! **Now its own EIS concludes that all of its military alternatives, that is, Alternatives 1, 2, and 3- have significant unmitigable impacts—that is, all are environmentally unjust! Impacts that will not go away unless there is no military training.**

What's the next step? Find an alternative for military training. Let's us begin the cleaning up and restoration of Makua!

Karen GS Young
86 – 024 Glenmonger St.
Wai'anae, Hawaii, 96792

Ph 696- 4677

Responses

I5-13

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.

I5-14

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. In addition, cultural and environmental justice impacts are addressed in Sections 4.10 and 4.12 of the Draft EIS.

I5-15

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.

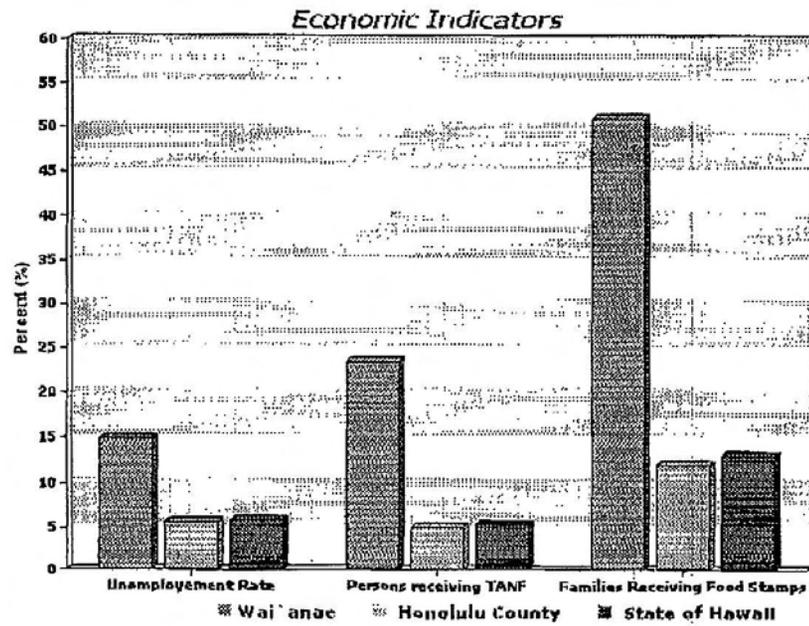
I5-13

I5-14

I5-15

Comments

Responses



© University of Hawaii - Center on The Family

Letter I6

Comments

Response And Comments To The DEIS on Military Training Activities at MMR, HI

- I6-1 | 1. Draft EIS on Training in Makua, needs to include all alternative locations for training including those for short term as well as long term use. Therefore, incorporate the congressionally mandated report on all possible alternate sites to Makua.
- I6-2 | 2. It is important and necessary to include the effect and relationship of the proposed Stryker Brigade on proposed training in Makua.
- I6-3 | 3. Archeological study: this is apparently an inadequate study. Please refer to Malama Makua’s consultant’s report.
- I6-3 | 4. Draft Marine Resources Study
 - a. Original S & A plan was flawed. Most recommendations by community and our consultants were not followed.
 - b. Nanakuli muliwae (known to local people as “stink pond”) is a poor and unacceptable choice for the control muliwae. It’s in an urban drainage area (e.g. from a four lane heavily used highway) as well as gets drainage from Nanakuli Ranch. Therefore it is obviously contaminated. This goes also for Sandy Beach. The area was used for military training in the past. You should have a better control muliwai, even if you have to go to an outer island - one where there is no history of military training, ranch, or urban area runoff. .
 - c. Limu study found high levels of arsenic. The next obvious test was not done, i.e., to determine percentage of inorganic (toxic) vs. percentage of organic (safe) levels. Will you do it ?
All limu samples need to be identified-- not only by scientific but also by local names. The limu sample was too small. Needs to be larger.
 - d. Were the field notes redone to be clearly legible? Were all tables and information included in the appendices?
 - e. Re fish catch: didn’t include eels (puhi) which was strongly recommended in scopings. Need to do night fishing as well as diving both day and night. Fish sample was too small, only 34 gms. EPA recommends 258 gms. Analysis of fish samples should be segregated by species.
 - f. Molluscs (shellfish) and crustaceans are supposed to be included in this study; e.g. crabs in muliwai and urchins near shore and benthic organisms. Please do it.
 - g. “There was a potential hazard to benthic invertebrates from 2,3,7,8-TCDD in sediments in the south muliwai” (Page 6-3 near the bottom). It is unlikely that dioxin found in the muliwai came from “burning of household waste.” More likely, is the burning that occurred in the former OB/OD site. Please refer to my testimony on February 24, 2007 and the photo I took of the OB/OD site in 1979 and exhibited at that meeting. That information should be included in the revision.

Responses

I6-1

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.

I6-2

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.

I6-3

The Army appreciates you input. The complete Marine study and responses to the public’s comments on that study are included in Appendix G-8.

Comments

Response and comments to the DEIS on Military Training at MMR in Makua, HI
Page 2

Dioxin/furans were also found in the “Halliburton” study of the OB/OD site (1994, I believe). This is important information regarding the cumulative effects which are supposed to be included in the EIS. Please so note in your revised report.

- h. Re: Draft Marine Resources Study (page 6-2) you state “there is no obvious pattern of deposition of explosive related chemicals.” Yet you stated that perchlorate was found in surface water and detected in six samples of fish from the muliwai. That appears to be a pattern to me. The dioxin/furans may not show “obvious pattern” but were widely distributed” in the environment tested. Therefore, there could be a less obvious and more subtle pattern.
You reported that xylene was detected in fish samples. This is disturbing and again raises more questions.
Your study has raised more questions than it has answered.
The critique by our consultants goes into more detail and needs to be addressed.

- i. I quote from your Appendix C page 7 paragraph C.4.1:

”A significant number of organochlorine data were disqualified because They could not be accurately quantified. Additionally, nitroglycerine and RDX data from three samples were disqualified. This resulted in a reduced number of valid data with which to use in the project assessment”.

Your honesty is appreciated—I would expect nothing less. However, this appears to be a “significant” gap and deficiency in your data. This study needs to be redone!!!

We need more information and answers.

Sincerely,

Frederick A. Dodge, MD and Karen GS Young, NP
86-024 Glenmonger Street
Wai’anae, Hawaii 96792
Phone 696-4677

Responses

Letter I7

Comments

Responses

From: Lawrence G. Ebel [bud96792@hotmail.com]
Sent: Monday, August 22, 2005 12:59 PM
To: Makua EIS, POH
Cc: anne96792@hotmail.com
Subject: Makua EIS 8/22/05

I7-1|

Sir:
I wish to reiterate my previous testimony and add the following.
1. The army has my full support for the purpose of using Makua valley for training.
2. This additional lawsuit filed for Malama Makua, by David Henkin an attorney at earthjustice is in my opinion just another example of the pattern of obstructionist behavior and an extension of the sovereignty movement here in Hawaii.
3. The army is considered an occupying force by some in the sovereignty movement and as such must be harassed to the full extent the law allows.
4. The use of the EIS is justified by these hate groups that seek to undermine all efforts to protect the laws and values and citizens of the U S A.
5. If the lawyers did not get paid by directive of the courts, these frivolous lawsuits would not occur.
6. The incidence of fires this year on Oahu and in particular the west coast (the majority started by arsonists) has far out stripped the number for all of last year, over 700 so far. Yet it must be noted that the protection offered by the army has saved Makua valley from any damage. SO MUCH FOR THE SAVE MAKUA VALLEY MOVEMENT.
7. I don't think any other valley here on the Waianae coast has been saved from fire damage and subsequent destruction of native plant habitat and destruction of the so called archaeological sites.
The U S Army deserves credit for this.
8. I could go on in much more depth, as there is so much miss and false information being spread about the Makua valley, but enough already as they say.

Bud Ebel
84-854 Fricke St.
Makaha, Hi. 96792
bud96792@hotmail.com

I7-1

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.

Letter 18

Comments

Responses

MARY A GLOVER MD
87-226 HOLOMALIA PL
WAIANA, HI 96792

18 Sept.2005

Mr. Gary Shimakata
Bldg. 230 Fort Shafter, Hawai'i 96858-5440

Dear Mr. Shimakata:

Please forgive mistypings; I couldn't get computer to behave.
This is about Mākua and also Hawai'i. Hawai'i could demonstrate

to the world how to live in peace sustainably. We have proved
that a true community of vastly mixed ethnicities can not only
exist, but prosper.

Serious threats to existence on this planet are increasing.
Are today's actions depriving our descendants the opportunities
and enjoyments we have had? We must focus _____ and do
the hard things if we care about them.

I8-1| Hawai'i may have been appropriate for military use at one
time, but not in today's world. ^{Of current draft EIS}
Volume 2 Appendix C analyzes Makua's
"size, location, and suitability for manoeuver training". Let's
be forward-looking and fair and analyze the size, location, and
suitability of a cleaned-up Mākua Valley to demonstrate sustainable,
peacefull existence to the world. For example:

as MMR	mainland	historical Mākua Valley
Limited space not contiguous with other military areas.	Capabilities of analyzing all of the contiguous 48 states	Name has many implications. Although by 1920, use had evolved into ranching and farming and fishermen,
Access from other military areas is by one highway which gets blocked unpredictably by accidents and heavy traffic most daylight hours.	For more appropriate topographic area to which recruits could be gathered at less cost (time and \$ than going to and from Hawai'i. An area could be found more suitable year-around and no concern about endangered species or disturbing or endangering nearby communities.	homes legends abound; careful research could enable our constructing a mental picture of the Valley as it was hundreds of years ago and could be again. For example in Marion Kelley's most "Cultural Hist. Report of MMR and Vicinity: Makua Valley" are references to times of the year when the stream came down into the sea and a spring on its south bank connected to the Valley. Within recorded history, it is recalled as having many trees--and climatologists say "rain-forests make rain".
Long dry season with danger of fires and heavy rains sometimes preventing training.		

I8-1

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

Responses

MMR use cont'd

Historical/Reawakened

Before each CALFEX explosives are transported through populated areas and near several schools.

so with careful planning and replanting, enough water for sustainable living again, year-around.

The billions now spent on killing and creating havoc and environmental degradation--and the scientific brains and equipment on this--Wow! What a wonderful world we could have if these were switched to analyzing causes and eliminating the poverty which provokes unhappiness, unrest, frustration--and violence.

Sincerely,
M. J. [Signature] WJ
12:01 AM

Letter I9

Comments

Responses

September 19, 2005

Mr. Gary Shirakata
U.S. Army Corps of Engineers
Environmental & Special Projects Branch
Building 320
Fort Shafter, HI 96858

Dear Mr. Shirakata,

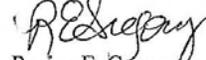
Thank you for this opportunity to testify on the Mākua Valley environmental impact statement.

I9-1

Clearly the "No Action" alternative would be best for the environment. As with Kaho'olawe, the military should clean up the land and give it back to the people of Hawai'i. The United States is a vast country with plenty of room for such exercises on its own territory.

Thanks for your consideration.

Sincerely,



Regina E. Gregory

I9-1

The Army thanks you for your comment and appreciates your recommendations and will consider them as it moves forward with the NEPA process. Your comment has been considered and has been included as part of the administrative record for this process.

Letter I10

Comments

Responses

From: Isaac D. Harp [Imua-Hawaii@Hawaii.RR.Com]
Sent: Friday, October 07, 2005 12:32 PM
To: Makua EIS, POH
Subject: Comments on the Makua Draft EIS

Dear United States:

Please understand that I am not anti-American, I am merely pro-Hawaii, and yes, there is a difference.

I10-1 I do not wish to play the game of the United States any longer. I refuse to comment on a document created by the United States that intends to support the further unlawful imposition on Hawaii by the United States military. Therefore, as a reminder I will point out the simple truth, which the United States also knows to be the truth.

Hawaii's citizens never voluntarily relinquished sovereign jurisdiction of Hawaii to the United States, as referred to under United States Public Law 103-150. Therefore, from the date of the signing of United States Public Law 103-150, the United States knowingly and willfully continues to promote the unlawful hostile United States military occupation of Hawaii, and it's expansion of intrusion.

I10-2 The unlawful hostile occupation does not provide the United States the lawful right (under any law) to expand their military activities in Hawaii either during times of peace or times of war. Therefore, under the color of honor and obedience of law, the United States must withdraw from Hawaii, and further, willfully repair the damages caused in Hawaii dating back to the year 1893.

Sincerely, Isaac D. Harp
Hawaii National
(Living Under Duress due to the Belligerent United States Occupation of Hawaii)
P.O. Box 437347
Kamuela, Hawaii 96743
(808) 885-8540

10/14/2005

I10-1

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.

I10-2

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.

Letter I11

Comments

Responses

I11-1

17 Aug 05

Dear Mr. Shirahata,

Re. Makuu Training & military reservation, I say keep the U.S. Army there! Let them do what they need to do for the protection of this land, and for all of America.

I am a grateful Navy veteran 6 years, and am very grateful for our U.S. Army doing for all of us.

Thank you & God Bless you all.

Sincerely,

Susanna J. Holtz



Miss Susanna Holtz
 Apt. C316
 85-175 Farrington Highway
 Waianae, HI 96792-2154

697-0040



I11-1

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.

Letter I12

Comments

Responses

From: Philip Hyatt [kawehi11@msn.com]
Sent: Tuesday, October 11, 2005 7:51 PM
To: Makua EIS, POH
Subject: DEIS-For the Record

Aloha,

Please enter this testimony from The Native Tenants' Hui to the others opposing the continued use of Makua by U.S. military occupation. The EIS is a fraud and nothing but a way to steal our identity as native tenants with 1/3 undivided vested rights in over four million acres of lands in Hawai'i and up the coast.

I12-1

Over thirty years ago, Kaho'olawe called out and many of the young flowers emerged to stop the bombing of Kaho'olawe and eventually, Kaho'olawe was liberated from U.S. occupation in the 1980's. Surely, when the voices of our people hear Makua calling, it's time to pack it boys and get out of dodge...the jig is over. We love the American people...we just can't stand those Americans who try to cram democracy down our throats when infact, they are the ones doing the wrong things.

I12-2

What's up with that? It's time the U.S. military sit down and figure out how we are going to end the occupation of Hawai'i by the U.S. in an amicable way...without wars and, without threats and without buying us out.

I12-3

As a native tenant it is my responsible to say no to the EIS, because it's not pono and the U.S. military is not pono and if they continue to abuse us and our lands, we will not be responsible for their pains. We are not happy with the way Makua has been used and want the U.S. military to give that back to the people of Waianae to; grow food, tap water, develop schools of sorts, gather herbs, making it family friendly and 'ohana multi-use and community uses as well. Not just for cultural uses, but for educational used as well and economic developments classes to teach about economics by hands on experiences.

As a child, my uncle's Bal Kauihana and Samuel Mahiai and their families; immediate and extended, lived at Makua beach during the late 50's and 60's up until the 80's, when they and many other families were evicted from their homes in Makua. They took good care of the lands, grew their own squashes, beans, tomatos, herbs and a pig or two from time to time. As fishermen and automechanic background these families lived an independent lifestyle and never on welfare, found themselves homeless so the military could continue to abuse Makua as it saw fit. That really hurt us knowing that that beautiful peice of land is used for target and military practices.

I12-4

I12-5

We say again, stop the bombing and hostage holding of Makua ASAP and make other arrangements to bomb and train somewhere else.

Malama Pono,
 Rita K. Kanui,
 Native TEnant
 41-169 Poliala Street
 Waimanalo, HI. 96795

Me Kealoha Pumehana
 R. Kawehi Kanui

10/14/2005

I12-1

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.

I12-2

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.

I12-3

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.

I12-4

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.

I12-5

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.

Letter I13

Comments

Responses

From: Sparky Rodrigues [srodrigues@olelo.org]
Sent: Thursday, October 06, 2005 8:04 PM
To: Makua EIS, POH
Subject: Marion Kelly's comments.

Gary, forwarding Marion Kelly's comments. sr

Aloha, Sparky:
Thank you for your message about Today being the final day to get information regarding our Makua Valley.

Please could you send in this message for me?

My name in Marion Kelly. I was hired by the Military to write the original Report on Makua.
I wrote what I was given by the people who lived there in times past.

I even went to the Railroad Engineer who at the time lived far away and I interviewed him. He told me about the stopping in Makua to let someone off, or to pick up material that was destined for Honolulu.

I also interviewed the people who had lived in Makua Valley, those that were left after all the years that the Military had used the Valley.

I13-1 | I think it is time that the Military should return the valley to the people who lived there originally, the people whose land was taken away by the Military. Sixty four years have gone by and there is no need for the Military to hold on to such a productive valley.

The people who lived there had made it so very productive.

The time as come to right the wrongs, and to correct the mistakes that the Military made back in the early days of the war. There is now no need for the Military to have this valley. War is very different today from what it was then.

I13-1 | The Military must return the Valley to its residents, to the people who lived there and to the State of Hawai'i.

Thank you, and I hope you will do the right thing -- return the valley.

10/7/2005

I13-1

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.

Letter I14

Comments

86-226 Farrington Hwy.
Wai'anae, HI 96792

facsimile transmittal

To: United States Army Fax: (808)438-7801
 From: Poka Laenui Date: 10/4/2005
 Re: Response to EIS Military Training Activities at Makua Valley Pages: 4
 CC:
 Urgent For Review Please Comment Please Reply Please Recycle

I14-1| **The EIS has several inadequacies and is therefore incomplete. These inadequacies fall under 5 categories: a) Accessibility, b) Traffic, c) Storage of Weapons, d) Failure to consider psychological factors affecting the overall behavior and mental health of the community, and e) specific shortcomings in the provision of information. I therefore object to the action proposed as contemplated in the EIS.**

I14-2|

I14-3| 1) Accessibility: The organization and style of writing this EIS makes it impossible for the average member of the public to understand its content or evaluate the proposed action contemplated. The language is far too technical, the massiveness of the document makes it difficult for one to read the full content, and the topics selected for review and the method of review is skewed in such a way as to constitute a promotional rather than an evaluative document.

The average member of the public generally reads in the language of the 4th grade level. The comprehension of an average reader, however, can attain the level of a high school graduate. The reading capacity of a member of the Wai'anae community falls below the average for the general public, if we take the educational statistics publicly available.

I14-4| This EIS is written at a language level closer to the 10th grade and the techniques of persuasion employed are detectable probably at the 3rd year college level. As a result, it fails as an effective communication piece of writing for EIS purposes and instead satisfies only a promotional rather than an informative purpose. It serves the U.S. Army well. It fails to serve the general public's ability to participate in public comment on important environmental issues.

CONFIDENTIAL

Responses

I14-1
 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.

I14-2
 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.

I14-3
 The Army has 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. In addition, the Army has provided information on the proposed action and alternatives and their effects on the environment in various forms throughout the Draft EIS (executive summary, tables provide concise data on the project and resources, and summary tables that provide brief overviews of the expected impacts).

I14-4
 To support the public's review of the Draft EIS, the Army has held informational meetings prior to the start of the review period, has maintained a project web site with background information on the project, and has made its resource specialists available during public meetings on the Draft EIS.

Comments

2) Traffic: The army has described a massive influx of military activity in the Wai'anae community. This community is tied together by one main roadway – Farrington Highway. Along this roadway travels all of its members coming into or leaving the community. On this roadway travels the community for its internal activities of local trade, social interaction, education, medical services, access to the public beaches, etc. Along this roadway travels all its emergency vehicles, be they for medical, fire, or police purposes. The roadway is the lifeblood of the community. It is congested at all times of the day, from as early as 5:30 a.m. to 6:30 p.m. It is not unheard of for one to travel from this community to Honolulu, or back, a distance of approximately 35 miles, taking as long as two hours.

I14-5 | The Army suggests that its sharing of the roadway would have minimal impact upon the community life because it would select only certain hours of the day at which it would travel. Yet, it has not identified any particular time of the day when this roadway is not heavily used. One would normally expect very heavy traffic during the morning and evening hours for workers going or coming from work to this “bedroom” community. Wai'anae also have a very heavy student transport population of scholars going outside of the community for education, i.e. private schools or colleges and universities. However, the traffic pattern is not so simple to understand. Following the morning work traffic, there is a heavy local school traffic, and following that, there is traffic of general economic and social intercourse. Even during the expected times of light traffic, i.e., 9:00 a.m. to 1:30 p.m., Wai'anae residents have experienced the same 2 hour type of traffic tie-up from Honolulu to Wai'anae over the last six months or more.

I14-6 | In the organization I am employed, the Wai'anae Coast Community Mental Health Center, the case managers to the seriously mentally ill are required to service consumers as far away as Kaneohe (State Hospital), Kailua (various treatment facilities), or Honolulu (Hospitals, prisons, care facilities) on a regular basis. This organization employs over 100 individuals in various capacities. The organization is already experiencing an almost impossible task of maintaining adequate services to those consumers outside of the community simply by the time it takes to travel to and return from those sites. Adding the increase of traffic congestion to the single roadway would place a tremendous burden on this organization in particular, and the general Wai'anae public, in general.

I14-7 | The present condition of Farrington Hwy. is not adequate to service the additional activity proposed by the U.S. Army without disastrous impact upon public transportation in the community.

I14-8 | The materials to be transported by the Army across Farrington Hwy. and the methods of transportation have not been adequately discussed. What are the types of weaponry to be transported? Will chemical agents be transported? Depleted uranium weapons? Nuclear weapons? Biological agents? When weapons are transported, will there be an interference in the traffic pattern? Will the Army close the roadways to civilian use? For how long? What about emergency vehicles? If the Army determines not to transport certain types of weapons because of the high risk, how will they transport such weapons to the Makua training site? If by air, where are the studies to reflect on the safety of such transport systems? If by sea, where are the studies to reflect the safety of such transport systems? Have there been adequate scenarios describing events of accidents, terror attacks, etc. and the impact of such transported weapons to the Wai'anae community?

Responses

I14-5 | In Section 4.6 of the Draft EIS, the traffic analysis compared the estimated vehicle trips associated with training events at MMR to peak traffic periods along Farrington Highway and at the affected intersections.

I14-6 | In Section 4.6 of the Draft EIS, the traffic analysis found that the increase in traffic volumes in the communities along Farrington Highway would be within the normal daily fluctuations in hourly traffic volumes.

I14-7 | As discussed in Section 4.6 of the Draft EIS, the impact of additional traffic generated by the project at key intersections would not be considered significant, based on the current traffic volumes along Farrington Highway.

I14-8 | The weapons systems used for the CALFEX are described in Table ES-1. The Army policies for transport of ammunitions are described on pages 3-66 to 3-69 of the Draft EIS.

I14-9 | The Army policies for transport of ammunitions are described on pages 3-66 to 3-69 of the Draft EIS.

I14-10 | Transportation of ammunition by helicopter includes safety measures, such as avoiding flying over heavily populated areas, using over-water routes, and ensuring secure storage of ammunition. No records have been found regarding accidents involving aircraft transporting ammunition in Hawaii. Transport by sea is not proposed.

Comments

Responses

(Cont.)

I14-11

Because there are no tactical or strategic facility targets at MMR, it is not expected to be a potential target for terrorists. Further, there is no indication of any terrorist activity in the Wai'anae community. There are standard accident studies, but none specifically for Wai'anae.

Comments

Responses

- I14-12 | 3) Storage: And what of storage of such weapons during and after the exercise? The EIS fails to address this question.
- I14-13 | 4) Psychological Factors: The Army's EIS failed to address psychological impacts of its contemplated activity upon the community. As a result, it is inadequate.
- I14-13 | The Wai'anae community is one of the most complex in all of Hawai'i. It has a major Native Hawaiian community, and among the most active in the search for identity, historical justice from the injustice of American colonization, preservation of natural, religious, and historical-archeological sites, and for self-determination. The community has a large population of former U.S. military service personnel, many of whom continue to suffer from Post Traumatic Stress Disorders (PTSD) as a result of their association with the wars and military engagements conducted by the United States government. It also has a large population of seriously mentally ill. It has an equally large population of those most susceptible to mental illness due to the low social-economic condition of the community, the heavy use of alcohol and other drugs, and the limited availability of primary and mental health care for those in greatest need for such care. The children and youth population in the Wai'anae community are also highly susceptible to instability and mental illness for all of the reasons their adults are susceptible. The EIS has failed to look at the particularities of the Wai'anae community and instead have proceeded to treat the community as if it falls within middle America.
- I14-13 | The practice of war at Makua, the heavy increased presence of military armament and personnel in the Wai'anae community, the possible presence of other foreign military in and about the community as participants of such war exercise, the constant reminder of bombings, destruction to civilian communities throughout the world, and the heightened awareness of terrorists, of suspicion, of military invasions will constitute such a psychological impact that its end result has not been anticipated or addressed. The EIS has failed to study the broad psychological impact upon this particular community. It has failed to address the impact this activity will have on children in their early years and as they mature into adults. It has failed to address the impact on those already suffering from a variety of psychological diagnosis from depression, mania, PTSD, phobia, etc.
- I14-15 | 5) Other Specific Concerns:
- I14-16 | a) The EIS gives an inadequate explanation of the historical-legal history of the Makua area in the hands of the military. It addresses the Army's authority under martial law after December 7, 1941, to take over the entire area for security and training operations. It does not distinguish the legitimacy of this authority in light of the U.S. Supreme Court's subsequent decision declaring martial law in Hawaii unconstitutional.
- I14-17 | b) The executive summary refers to the territorial governor's "consent" in conferring lands to the Army. There is no adequate discussion of the governor's authority to give such "consent" nor the form for which such "consent" was given. The action of the territorial governor may very well be contrary to the prior transfer of territorial lands from Hawaii to the United States. It is an issue which should have been explored to a greater extent.

- I14-12
Ammunition handling is described on Pages 2-18, 2-19, and in Section 3.11.4 (beginning on Page 3-224) of the Draft EIS. As mentioned in Section 4.11.3, The Army also has standard operating procedures for the safe handling and storage of ammunition during training events at MMR.
- I14-13
The assessment of psychological impacts on the civilian population is outside the scope of NEPA. The focus of NEPA is on the environment. Pursuant to CEQ Regulations 40 CFR Part 1500, "NEPA is our basic national charter for protection of the environment." "The NEPA process is intended to help public officials make decisions that are based on understanding of environmental consequences, and take actions that protect, restore, and enhance the environment."
- I14-14
Please see the response to Comment I14-13.
- I14-15
The military and legal history of MMR are discussed in Section 1.1 of the Draft EIS. The Draft EIS and its evaluation of the proposed action and alternatives are based on the current conditions at MMR.
- I14-16
A discussion of historical legal issues is outside the scope of this EIS.
- I14-17
Please see response to Comment I14-16.

Comments	Responses
<p>I14-18 c) It also refers to the territorial government's grant of a revocable permit "to assist in the present war effort extending for the duration of the present war and six months thereafter." The EIS simply declares that "It has remained under Army control ever since." It leaves a wide gap of explanation as to the basis under which the Army has continued to control these lands from that period of six months following the end of WWII to the present time, a period of almost 60 years! In its statement that the federal government exercised its option to set aside lands for continued use following statehood, the EIS failed to address the mandatory return of lands five years after statehood contained in the Statehood legislation, and the subsequent extension of that period under Federal Legislation (PL 88-233). It failed to address the fact that these lands were indeed transferred to the State of Hawaii in 1964 or thereabouts, and the action taken to subsequently lease back to the military the Makua lands. Without an adequate review of this history, the EIS is inadequate and fails to give the general public necessary information for it to understand the historical significance of the current action contemplated.</p> <p>I14-19 </p> <p>I14-15 </p>	<p>I14-18 Please see response to Comment I14-16.</p>
<p>I14-20 Conclusion: The Army should address the above concerns adequately before permitted to go forward. At this point in time, it has failed to produce an appropriate EIS upon which the public make evaluate and comment.</p>	<p>I14-19 Please see response to Comment I14-16.</p> <p>I14-20 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.</p>

Letter I15

Comments

Responses

FAX TO: Mr. Gary Shirakata
US Army Corps of Engineers
Honolulu Engineer District, Bldg. 230
Fort Shafter, HI 96858-5440

FAX NO: 4~~2~~8-7801

SUBJECT: Makua EIS Community Resonse

FROM: Mike (Sang) Lee

DATE: October 5, 2005

Number of pages including this one: 5

Comments

Responses

RESPONSES TO THE NOISE SECTIONS OF MAKUA DRAFT EIS

I15-1	<p>1. – page 3-50</p> <p><i>Table 3-12 Summary of Noise Data From 31 January 2003 CALFEX Parameter Units Mākuā Beach Lower Mākuā Valley Silva Ranch</i></p> <p>There were other noise monitoring done (5/22/2002, 1/29/2003, 4/8/2003 and 4/10/2003). Why weren't these included and why only the data from 1/31/2003 monitoring is listed? Reason(s) for selecting should be cited.</p>	<p>I15-1</p> <p>Appendix G-4 provides a summary of noise monitoring data collected from each of the monitored CALFEX events. Table 3-12 in the EIS provides data from a representative CALFEX event.</p>
I15-2	<p>2. page 3-51 to 3-54</p> <p>The reports cites various ADNL levels computed from SEL levels. Do the ADNL levels take into consideration of nighttime flights (during which 10 dB penalty must be included?)</p>	<p>I15-2</p> <p>Yes, ADNL calculations apply a 10 dB penalty factor to nighttime noise events</p>
I15-3	<p>3. page 3-53</p> <p><i>The noise generated from these vehicles on Mākuā Valley Road and Farrington Highway would result in very short periods of localized noise as the convoys pass by.</i></p> <p>This statement is too vague. How short is 'very short'? During such 'very short periods' the impact would be significant at noise sensitive areas (e.g., schools, churches, residences, etc.) This needs to be addressed much more thoroughly. Noise-sensitive areas should be identified along the convoy route, the existing conditions should be established by noise monitoring and the impact due to additional traffic should be addressed and if needed, mitigation measures recommended.</p>	<p>I15-3</p> <p>Page 4-46 and Figure 4-4 in the Draft EIS summarize estimated maximum pass-by noise levels at a distance of 50 feet for various types of military and civilian vehicles. Most vehicles in military convoys will be Strykers, HMMWVs, trucks, or buses. Noise levels from military vehicles will be similar to noise levels from civilian commercial trucks and buses. Maximum pass-by noise levels from any vehicle will last about one second. Overall convoy pass-by noise events will last less than a minute. Figure 4-4 has been revised.</p>
I15-4	<p>4. several pages on Sec 4.1 (pages 4-8 through 4-15)</p> <p><i>Here, the reports states that 'Alternative 1 indicate that Mākuā Beach would be within Zone III (greater than 70 dB CDNL). In accordance with DA PAM 200-1, this noise zone is not compatible with recreational land use. This conflict with the existing recreational land use is a significant impact under Alternative 1.'</i></p> <p>And, of course, under Alternatives 2 and 3, the impact is more severe. The report does not address the possible mitigation measures except 'notifying beach users at least one week in advance of planned training activities. Notices would be posted on the Mākuā Beach access gates, in local newspapers, and on the DLNR Division of State Parks Web site or other such Web sites. This notification would provide beach users the opportunity to plan recreational activities around the hours that the Army would conduct training. Because these events are normally scheduled for weekday</p>	<p>I15-4</p> <p>Additional mitigation could require that training activities be re-scheduled, re-located or halted or that access to the beach is closed, which is a significant impact on its own. Due to the shape of the valley and the concerns with wildfires and threatened and endangered species, relocating the exercises farther to the rear of the valley would not be possible. As far as re-scheduling goes, training activities are on a strict timeline due to the burn index restrictions and would only allow training to take place for a limited amount of time, which would limit the duration of training to hours of the day where the burn index is low enough to allow training to take place. Training occurs primarily on weekdays when public use of the beach is lower.</p>

Comments

Responses

I15-5	<p>5. page 4-11</p> <p>The report states that: <i>'Mountain bike riders and hikers are aware of these conditions. Their travel up to the Mākua Lookout Point is not necessarily impeded and their recreation use is not significantly disturbed by noise from small arms and explosives and helicopter flights down in Mākua Valley.'</i></p> <p>Any form of a scientific report should not make such statement based of subjective judgment. It should back it up by quantitative data. There are many reports available on this subject matter (flyovers and other noise nuisance in national parks on the mainland.) These should be researched and the result cited.</p>	<p>I15-5</p> <p>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. Further information and background on this issue was provided in Sections 3.5 and 4.5 of the Draft EIS, which discusses noise impacts on recreational users.</p>
I15-6	<p>6. Sec. 4.5, page 4-38</p> <p>The report states that: <i>'The use of shape and cratering charges was included in the analysis. The type of cratering charge analyzed, 40 pounds (18-kilograms) of B4, which contains various mixtures of RDX and TNT, may differ from the type of cratering charge actually used. The Army may detonate cratering charges containing up to 150 pounds (68 kilograms) of ammonium nitrate. The maximum charge that the Army would detonate in a single explosion during training exercises is 300 pounds (136 kilograms) of ammonium nitrate. This variability in the type of cratering charge used does not affect the results of the CDNL contours, but it does determine the loudness of individual noises. The use of ammonium nitrate at the levels indicated would produce a louder noise level than the use of B4 at the amount analyzed.'</i></p> <p>Why weren't the analyses done with heavier charges? It may not affect the CDNL contour lines but, as it states, single-event noise levels are higher. The report should still show the contour lines for all charges to be used.</p>	<p>I15-6</p> <p>Section 4.5.1 in the EIS has been revised. Analyses of noise from various sizes of shape and cratering charges are discussed on page 4-40 of the Draft EIS. Table 4-4 of the Draft EIS summarizes peak noise levels from different weights of shape charges and cratering charges. Surface detonation of shape charges would produce higher peak noise levels than the detonation of large buried cratering charges. The modeling of CDNL noise contours was based on a representative level of training under each of the alternatives; this typical training would not include use of a 300-pound ammonium nitrate charge.</p>
I15-7	<p>7. page 4-39</p> <p>The <i>Summary of Potential Noise Impacts</i> table states that only the noise from ordnance use would cause significant impact and other activities less than significant impact. The report, however, should include the overall impact (all activities combined.)</p>	<p>I15-7</p> <p>Section 4.5.3 of the EIS has been revised. The overall noise impact would not be greater than the maximum noise source impact.</p>
I15-8	<p>8. page 4-40</p> <p>Table 4-4 cites noise levels for various explosive charges. It includes levels for the heavier charges but these are buried and not surface detonation. Is it true that the heavier charges will never be detonated on surface? If not, the levels should be included and the analyses for CDNL contours redone to reflect the new levels.</p>	
I15-9	<p>9. pages 4-40 to 4-41</p> <p>The report states: <i>'Continuous exposure to long periods of blast noise with peak level exposures of 128 dB would approach the threshold of pain for many people. However, most of the high-level impulse noise from cratering charges and mines would occur during the early morning hours and late evening hours when the beach is less likely to be occupied.'</i></p>	

Comments**Responses**

(Cont.)

I15-8

The purpose of a cratering charge is to damage roads, runways, and similar surfaces. These charges must be buried to accomplish this purpose. The hole for a cratering charge can be produced by manual digging or by detonation of a surface shape charge.

I15-9

As noted in Appendix F-1, a peak noise level of 115 dBA or more is likely to produce some degree of permanent threshold shift and the threshold for pain is approximately 130 dBA. Because the human auditory system does not respond instantaneously to noise impulses, it may be more appropriate to apply these thresholds to fast response Lmax noise data rather than to instantaneous peak dBA data. As shown in Appendix G-4, maximum fast response Lmax noise levels were less than 110 dBA during each CALFEX event at Makua Beach, the Admin Trailer area, and the Lower Valley monitoring sites. None of the observers present at MMR CALFEX events reported any pain from noise exposure even when adjacent monitoring instruments registered instantaneous peak noise levels of 128 dB. Even normal weather conditions can produce very high instantaneous peak noise levels. As shown in Appendix G-4, wind in tall vegetation produced an instantaneous peak dBA reading of over 120 dBA on April 8, 2003 when background noise monitoring was conducted on a day when no CALFEX event occurred.

As noted in Appendix F-1, an instantaneous peak noise level of 128 dB is well below the threshold for building damage effects. Building damage from airborne noise requires peak noise levels well above 130 dB (probably 140 to 150 dB for poorly constructed structures). The only structures in the immediate vicinity of MMR are in the administration trailer area of MMR. None of these structures show any signs of damage from airborne or ground-borne vibrations despite the fact that they are closer to ordnance detonation locations than is Makua Beach.

Comments

- I15-9 The 128 dB level cited is not only threshold of pain but well beyond possible building damage, let alone hearing damage for humans. Citing information from page 5 of the Appendix F (on noise) the level is beyond 'threshold for immediate NIPTS (Noise Induced Permanent threshold Shift)), meaning it would cause immediate and permanent hearing damage.
- I15-10 10. page 4-41
The report states: *'The helicopter hovering time would be approximately three to four half hour periods during the estimated five to six hours for each training week. These short hovering periods would result in noise levels at Mākuia Beach of approximately 65.3 dB.*
- The cited 65dB level is vague. Is this SEL, Lmax, Lpeak ?
- I15-11 11. Appendix F-2 (Sound Level Meter Logs)
- The data does not include basic meteorological data (wind, temp, etc.) All sound monitoring data should include these.
 - The data does not include noise sources in the surrounding area during the monitoring (both ambient and single-event). Furthermore, each single event should be noted when it occurs.
 - Was the instrument calibrated to 93.8 (or 94.0) dBA ?
 - Some of the data show big difference between Lmin and L95. For these L99 should be included.
 - There are some intervals during which Lmin is 10 to 15 dBA higher than those of the other intervals on same day. This is very unusual. This should be discussed and stated as to why such big differences occurred.
 - Some of the site selections were poor. Monitoring should not be done near any undesirable noise sources such as generators or pumps, as were the cases cited in the report.
 - Monitoring done at the Silva Ranch stated the meter was placed *'about 50 to 75 feet'* from the highway. Traffic on the highway is the obvious major noise source. Such situation calls for more accurate distance measurement. It appears the person estimated the distance. He/she should use wheel-tape (or roller-tape) device.
 - Monitoring done on May 22, 2002 was not logged. Any particular reason for this? Was the instrument not capable?

Responses

I15-10
Section 4.5.3 has been revised. Helicopter noise level estimates are the Lmax dBA value. For a hovering helicopter, the average noise level (Leq) for the duration of hovering would be very close to the Lmax level.

I15-11
Meteorological data, which provides climatological context for the air and noise studies, has been added as Appendix G-7. Meteorological data are routinely measured during noise monitoring studies for situations that allow permanent or long-term sheltered instrument packages to be installed, and where meteorological towers do not cause conflicts with aviation activities. Meteorological data are rarely measured for short duration noise studies that require portable instruments. Portable instruments were required for the CALFEX noise monitoring because permanent monitoring instrument setups were not practical, key monitoring sites could not be secured against public access, and because instrument locations might have to be varied due to changing conditions at different CALFEX events.

Noise monitoring procedures included collection of 1-second time histories of monitored noise levels. A 1-second time history makes it impractical to identify and note individual noise events. Furthermore, troop activity during CALFEX events was not continuously visible from any location, thus precluding specific identification of individual noise events recorded in the 1-second time histories.

Class 2 meters were used on May 22, 2002 and Class 1 meters were used for subsequent dates. Class 2 noise meters were calibrated using a Larson Davis CAL150 calibrator, which produces 94 dB and 114 dB tones at 1,000 Hz. Subsequent noise monitoring used Class 1 noise meters that were calibrated using the Larson Davis CAL250 calibrator, which produces a 114 dB tone at 250 Hz.

Comments

Responses

(Cont.)

I15-11

Differences between the L95 and Lmin noise levels simply reflect the number of impulse noise events recorded during a time interval. Small differences indicate either very frequent events or no events with disproportionately high peak noise levels. Relatively large differences between the L95 and Lmin levels indicate a small number of intense noise events during the interval. L99 data would not add any further clarification.

Monitoring locations inside MMR were limited by accessibility and safety considerations. No locations near the Admin Trailer area were free of potential extraneous noise sources, since public observers had access to this area. Given the logistics associated with monitoring for CALFEX activities, the noise monitoring was conducted near the air quality sampling stations at Makua Beach, Silva Ranch, and the Lower Valley monitoring site. Because the purpose of the monitoring was to collect peak noise level data, inflated minimum noise levels did not affect the analysis. Traffic noise contributions at Silva Ranch influenced minimum noise levels, but were not a factor in determining whether peak noise events during a CALFEX significantly affected areas south of the MMR boundary. On May 22, 2002 noise data was logged. Due to insufficient instrument memory, detailed time histories were not recorded.

Comments

Responses

RECOMMENDED ACTION

- I15-12 | 1. Include more noise monitoring data as a part of the main text.
- I15-3 | 2. Perform more thorough analyses and studies for possible impact on noise-sensitive areas along the convoy routes. These would include identifying noise-sensitive areas, establishing existing conditions, analyses to determine possible impact and if needed, mitigative measures.
- I15-4 | 3. Provide more comprehensive mitigative measures to address the 'significant impact' at the beach parks, rather than simply notifying the beachgoers in advance.
- I15-5 | 4. Perform a thorough research on available studies to address noise nuisance to hikers and mountain-bike riders at a natural setting.
- I15-13 | 5. Perform additional analyses to determine CDNL contour lines using heavier charges and other types of denotation (surface, buried, etc.)
- I15-7 | 6. State the overall impact due to all activities (ordnance, airfract, etc.); not separating individual activity.
- I15-14 | 7. Noise monitoring should be redone. It appears that the monitoring was performed rather haphazardly and unprofessionally. This may be so due to lack of noise sensitive areas nearby. However, this should not allow such a lack of care and professionalism. It is further recommended that these work be done by an acoustical consulting firm.

Submitted by:

Sang (Mike) Lee, Assistant Professor
 Leeward Community College
 Contact no.: 696-6378 ext. 109

I15-12
 Detailed noise monitoring summaries are provided in Appendix G-4. Table 3-12 provides representative data at three locations from the January 31, 2003 CALFEX event. Additional references to Appendix G-4 have been added to Section 3.5 of the EIS.

I15-13
 All heavier demolition charges would be buried charges, which have less noise impact than surface charges. CDNL contours would not be changed from those presented in the Draft EIS.

I15-14
 The noise monitoring study on May 22, 2002 was conducted using the Larson Davis 720 and 820 models. The other CALFEXs were monitored using the Larson Davis model 824. Monitoring sites selected were based primarily on potential public exposure consideration (the south end of Makua Beach closest to MMR CALFEX event activity), the Admin Trailer area where select members of the public are given access to view CALFEX events, and Silva Ranch, which includes the private residence closest to MMR).

Letter I16

Comments

Responses

Please submit my statement!

No. _____
Date 7.23.05

Earthjustice
223 J. King St.
4 Floor
Honolulu, HI

Attention: David Henken

As I am reading article "Army sees high fire risk at Mafua Star Bulletin 7/23/05, I am struggling for another breath of air."

My husband and I both suffer from severe sinus problems. After our reaction to pollen, smoke from volcanoes, all kinds of pollution in Waikiki are involved in our health problems.

I16-1 Additional smoke from fires caused by live fire training at Mafua would exacerbate our already polluted environment. What happens in Mafua affects our entire island.

I16-2 Another site must be found. We already are suffering too much.

P.S. Thank you for your efforts in protesting our environment.

Sincerely
Michelle Meyer
425 Ewa Rd #305A
Honolulu, HI 96815

I16-1

As noted in Section 3.4 and Appendix E of the Draft EIS, air quality conditions in Hawaii comply with all state and federal ambient air quality standards. The Draft EIS addresses the air quality impacts of smoke and other pollutants from wildfires in Section 4.4. Air quality monitoring was conducted during a controlled burn at MMR in October 2002. The results of that monitoring are discussed in the Draft EIS (Section 3.4.4 and Appendix G-6).

I16-2

The Draft EIS considered other training locations in Section 2.5. Based on the analysis in the section, the Army determined that only MMR satisfies the purpose and need for the proposed action.

Letter I17

Comments

Responses

From: TP [reelcom1@earthlink.net]
Sent: Sunday, August 21, 2005 2:06 PM
To: Makua EIS, POH
Subject: DEIS Comment

I17-1

I am writing to say I am FOR military training activities at the Makua Military Reservation including live fire exercises with a few provisions;
 1) Mon-Fri. 7am -11pm only
 2) Pack out/Clean up what you pack in
 3) Caution to keep noise, smoke and traffic to a minimum
 4) Consider closing 1-2 under used bases on Oahu and converting to parkland.

My reading up on it has led me to believe that live-fire exercises provide the very best training and in war time our troops deserve no less!

Thanks for listening!

Tom & Sharon McAuliffe
 Kaneohe, HI

I17-1

1. The proposed training would occur primarily Monday through Friday. Further restricting the hours of operation would present unreasonable obstacles to nighttime training. Due to the shape of the installation, noise levels in nearby communities are expected to be minor.
2. All training units are responsible for transporting the supplies they need for training in and out of the installation.
3. The extent of noise levels is greatly limited by the shape of the installation (shown in Figures 4-1 and 4-2 of the Draft EIS); smoke is a minor concern for routine training (see the air sampling report in Appendix G-6), and traffic would be kept to a minimum by avoiding peak traffic hours (see the Movement to the Site discussion in Section 2.4.3).
4. This consideration is beyond the scope of alternatives in this EIS

Letter I18

Comments

Responses

Review of the Draft Makua Environmental Impact Statement

By
Davianna McGregor¹
 Review prepared October 3, 2005

I was asked to review the cultural impacts sections of the draft Environmental Impact Statement for Military Training Activities at Makua Military Reservation.

My analysis and interpretations are derived from my training as a historian of Hawai'i and the Pacific; my research of Hawaiian cultural, subsistence, and spiritual beliefs, customs, and practices over the past 27 years; and my experience in conducting cultural impact studies over the past 14 years. With regard to the adequacy of the Draft Environmental Impact Statement ("DEIS"), I read the sections of the DEIS relating to cultural resources (Executive Summary, Section 3.10 (Affected Environment – Cultural Resources), Section 4.10 (Environmental Consequences – Cultural Resources), and Section 5.3.10 (Cumulative Impacts – Cultural Resources). I also reviewed the bibliography for the DEIS and read the following reports which it cited:

Kelly, M and Quintal, SM, 1977. Cultural History Report of Makua Military Reservation and Vicinity, Makua Valley, Oahu, Hawaii. Bernice P. Bishop Museum, Honolulu, Hawaii.

Ogden Environmental and Energy Services Co., Inc., 2002. "Final Report: Initial Implementing Activities for the Historic Preservation Plan at Ukanipo Heiau and Intensive Survey and Mapping of Archaeological Sites, Ukanipo Heiau Vicinity, Makua Military Reservation, Makua Valley, O'ahu Island, Hawaii."

Prashad, U and Nunes, K, 2001. Planning Level Oral History Survey, Makua and Kahanahaiki Valleys for Traditional Cultural Properties at the US Army Makua Military Reservation Waianae, Oahu Island, Hawaii. Draft

Social Research Pacific, Inc., 2003. "Cultural Impacts on Traditional Cultural Properties from Continued Military Use of U.S. Army Makua Military Use of U.S. Army Makua Military Reservation, Wai'anae, Oahu Island, Hawai'i."

Social Research Pacific, Inc., 2003. "Planning Level Oral History Survey Makua and Kahanahaiki Valleys for Traditional Cultural Properties at the U.S. Army Makua Military Reservation Waianae, Oahu Island, Hawaii," Final Report.

H. David Tuggle, 1997. "The Archaeology of Makua Beach: Background for an Environmental Assessment of Proposed Amphibious Training in Hawai'i Makua, Island of O'ahu," International Archaeological Research Institute, Inc.

¹ A copy of my resume is attached hereto.

Comments

US Army 25th Infantry Division (Light) and US Army-Hawaii. 2000. Programmatic Agreement among the 25th Infantry Division (Light) and the United States Army-Hawaii, the Hawaii State Historic Preservation Office, and the Advisory Council on Historic Preservation for Section 106 Responsibilities for Routine Military Training at Makua Military Reservation, Oahu Island, Hawaii.

Williams and Patolo et al Ogdan Environmental and Energy Services, 2000. Final Report: Intensive Archaeological Survey and Monitoring for Proposed Modifications to the Company Combined Assault Course (CCAAC) and Construction of a Fire Access Trail at the US Army Makua Military Reservation, Makua Valley, Island of Oahu, Hawaii.

Zulick, L and Cox, D, The Research Corporation of the University of Hawaii, 2001. Phase I Inventory Survey of Cultural Resources Within Makua Military Reservation, Island of O'ahu, Hawaii," Final Report.

In addition, I read the following report relating to the cultural resources in the Makua Military Reservation which was funded by the Marine Corps Base Hawaii in preparation for the Environmental Assessment for Marine Corps Amphibious Training in Hawaii:

Institute for Sustainable Development, 1998. Final Report: Oral History Study: Ahupua'a of Makua and Kahanahaiki, District of Wai'anae Island of O'ahu (Wai'anae Overview TMK: 8-1 & 8-2), [conducted by Kepa Maly] PACDIV Contract Number N62742-D-0006 D.O. 22, BCH Project No. 442.0122.

I18-1 It is important to note that the consultants for the DEIS did not have an opportunity to interview or receive responses to their questionnaire from members of Malama Makua and other community groups concerned with preserving Hawaiian culture at Makua. (Social Research Pacific, June 19, 2003, p. 13). However, in 2001, I interviewed members of Malama Makua, as well as of other cultural groups, by phone, including Mr. William Aila, Aunty Frenchy DeSoto, Sparky Rodrigues, and Rev. Kaleo Patterson. I asked them the following questions, to ascertain if there were cultural practices that they or persons they know of have participated in. I also spoke with Fred Dodge, M.D. for suggestions regarding key informants for the conduct of a more complete cultural impact study. I also did a site visit of the makai portions of the ahupua'a of Kahanahaiki, Makua, and Ko'iahi on August 25, 2001. In the past few years, I have taken my University of Hawai'i students on work projects with the Army botanists in the mauka portions of Kahanahaiki.

QUESTIONS

1. What is your relationship to Makua Valley? Did you have family who lived in the valley before World War II?
2. If so, where did they live?
3. Do you have family burials in the valley? What part of the valley?
4. Have you been in the valley? Where did you go? What did you do?

Responses

I18-1

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; however, the Hui did not provide a proposed revision. If there was a separate questionnaire from outside the Army, no member of the public has provided that questionnaire to the Army.

Comments

5. Are there particular resources in the valley that you or your family have used and would use?
6. Did your family have springs or wells on their land? Did they make use of springs or wells in the valley?
7. Does your family have an 'aumakua* relationship to a deity or nature force within the valley? Do you know of any family who does have such a relationship? Do you know if they need to make ho'okupu (offering) to this 'aumakua?
8. Are there any trails in the valley that you or your family used and would like to use? For what purpose?
9. Do you know of anyone who continued to hunt in the valley? Which part of the valley? What did they / do they hunt?
10. Do you know of anyone who gathered resources in the valley? What resources did they gather?
11. Is there a relation between Makua Valley and the leina** at Ka'ena?
12. Are there heiau (temples) and/or shrines that you or your family have taken care of and/or used?
13. Do you know of any heiau and/or shrines in the valley that someone has a relationship to or is caring for?
14. Do you know of any night marcher trails in the valley***?
15. Does the valley have the qualities of a spiritual pu'uhonua (place of refuge and retreat)?
16. Do you feel that you have a kuleana (ancestral responsibility) for Makua Valley?
17. Are there other persons related to families who lived in the valley with whom I should speak?

* An 'aumakua is an ancestral guardian spirit. An 'aumakua relationship is one in which an animal form is acknowledged to be an ancestral guardian spirit and thus, there is a responsibility to make offerings to the 'aumakua in order to connect with and honor this ancestral guardian spirit for continued protection and strength

**A leina is a point where spirits leap into the nether world, lit. leap of the soul.

***The 27th night of the lunar month is sacred to the god Kane. It is called Po Kane. On this night, spirits of departed chiefs march over pathways they trod in life.

While Makua is inclusive of Kahanahaiki, Makua and Ko'iahi, I will refer to the area under study collectively as Makua.

Findings and Conclusions:

In my opinion, as a historian of Native Hawaiian cultural, subsistence, and spiritual beliefs, customs, and practices, the Army's Draft Environmental Impact Study does NOT disclose all potential cultural impacts associated with its proposed training at the Makua Military Reservation.

The Environmental Impact Studies is deficient in the following aspects:

First, the report makes up a new category: Areas of Traditional Importance or ATIs. The report states on p. ES-25 that "The term ATI was created as a broad category because many places of importance to native, aboriginal, or local groups have not been formally evaluated, although

Responses

I18-2

The EIS fully assesses all potential impacts from the four alternatives in Section 4.10.

I18-2

Comments

I18-3 these areas have been identified through oral testimony or are associated with other cultural and natural components . . . It is highly probable that many ATI's would qualify as cultural properties following formal evaluation and consultation. " This essentially means that all of the cultural and natural resources that are not considered archaeological sites were not assessed and evaluated. However, these are the primary resources of importance for the re-establishment of cultural and subsistence practices in Makua. This is a major failure on the part of the drafters of the EIS and the principal deficiency in the draft EIS.

Moreover, the term that they created, ATI, implies that these are not areas of continuing cultural significance. The Hawaiian culture is a living culture that is dependent upon sustaining relationships by Native Hawaiians with ancestral lands and resources. The present generation of Native Hawaiians who have ancestral ties to Kahanahaiki, Makua and Ko'iahi (referred to collectively as Makua) have expressed the need to fulfill their obligation to connect with and care for ancestral lands, burials, heiau, shrines, springs, realms of 'aumakua (ancestral spirits), native plants, and animals. Most of them are one generation removed from the land, some are 2 generations removed, that is their parents or grandparents were removed from Makua at the beginning of World War II. The ability for this generation to reconnect with their ancestral lands is essential to their cultural identity as Native Hawaiians. At least two groups have expressed the desire and commitment to provide stewardship to the lands and cultural resources of Makua by constructing new cultural sites dedicated to the stewardship of Makua. One group, including William Aila constructed an ahu to Kanaloa and a second group, Kupu ka 'Aina rebuilt a paepae. The recommendation to continue military training in Makua would prevent the present generation of Makua families from fulfilling their responsibility as Native Hawaiians to their ancestral lands and ancestors.

I18-5 A complete and thorough study of the impact to natural and cultural resources utilized for cultural, religious and subsistence purposes must be conducted. Measures to prevent or to mitigate negative impacts, must be included in the EIS. The No Action alternative will result in the least impact to these resources.

I18-6 Second, the Army's claim that impacts to archaeological resources, areas of traditional importance and cultural landscapes (from trampling, stray rounds from guns, mortars, artillery and rockets, wildfires, etc.) are "mitigatable to less than significant" (DEIS, pages 4-146 to 4-151) is simply an incorrect and uninformed assertion. My experience with such incidents on the island of Kaho'olawe, prior to the termination of military exercises on October 22, 1990, is that there was noticeable and significant damage to our archaeological resources, areas of traditional importance and cultural landscapes. I directly and personally witnessed this at the Pu'u Moiwī adze quarry, Moa'ulaiki navigation training site and the Hale Halawai in Hakiowa.

I18-7 The Army's patronizing statement that blowing up or burning cultural sites "would result in ... PERCEIVED loss of mana by Native Hawaiians." (DEIS, page 4-148) is truly offensive in that it implies that the damage is not actual, observed and real, but only perceived. This is arrogant at best and dishonest at worst.

Third, the final report, "Cultural Impacts on Traditional Cultural Properties from Continued Military Use of U.S. Army Makua Military Reservation, Wai'anae, Oahu Island, Hawai'i by

Responses

I18-3 During training exercises, stray ammunition rounds from guns, mortars, and artillery could damage or destroy cultural properties, as could squad and platoon live-fire training, air assault, aviation support, and other proposed training activities. Landscape alteration caused by live-fire exercises may affect the integrity of setting of resources that are eligible for the NRHP. Live-fire training would increase the threat of wildfires, which could damage or remove landscapes, flora, and fauna associated with traditional practices. Reference Section 4.10 for a thorough discussion of this issue.

I18-4 In Section 4.10 of the Draft EIS, the Army assesses impacts to access to MMR by Native Hawaiians. Although MMR is an active training complex, the Army allows access consistent with training, safety, and other applicable requirements.

I18-5 In Sections 4.9 and 4.10 of the Draft EIS, the Army assessed impacts to all natural and cultural resources consistent with NEPA, the National Historic Preservation Act, and the Endangered Species Act. The Army has also assessed the historical and anticipated impacts to hydrology and other resources in Chapters 4 and 5. In Section 4.10 of the Draft EIS, the Army assesses impacts to access to MMR. Mitigation measures have been identified for impacts throughout Chapter 4 and are summarized in Table ES-4 in the Executive Summary.

I18-6 As now reflected in Section 4.10 of the EIS, the Army recognizes the potential for unmitigable significant impacts to these resources.

Comments

Responses

(Cont.)

I18-7

The sentence in Section 4.10.3 has been revised in the EIS.

Comments

- I18-8 Social Research Pacific, June 19, 2003, acknowledges that their cultural impact assessment is insufficient and inadequate due to time limitations and the lack of communication with the primary groups with ancestral claims and connection to Makua Valley. Their recommendations are aimed at laying the groundwork for conducting a more thorough, comprehensive Cultural and/or Social Impact Assessment. (p. 22). Clearly, by admission of the Army's own consultants, the Cultural Impact Assessment is inadequate.
- I18-9 Fourth, a more complete archaeological survey of middle elevation inland sites and complexes, including subsurface excavation must be conducted for the EIS to be adequate. The reports indicate that each successive surface archaeological survey has recovered a substantial number of previously unidentified complexes, sites and features. For example, Ogden's detailed survey of Ukanipo Heiau and the surrounding vicinity, as reported in November 2000, started out to assess one site with 11 features and actually found 4 new sites and 229 new features. The study by Zulick and Cox (2000) recorded 13 new sites and 58 new features in the Makua Military Reservation. The report notes that certain areas could not be assessed because they were in a high hazard area and no subsurface excavation could be conducted because of the hazard of unexploded ordnance. These studies indicate that expanded inland surveys consisting of surface and subsurface excavation have a high potential of yielding recovery of substantially more sites, features, and cultural resources. In addition, the Williams and Patolo report (2000), based on excavations in 1994 and 1995 suggested that pre-contact Makua Valley had water resources substantial enough to support two site complexes at middle elevations within the valley. These findings led the archaeologists to revise their original assumption that Makua was a dry valley supporting only a coastal population of Native Hawaiians who conducted limited inland gardening. The study by Zulick and Cox (2000) validated the assessment that there were habitation complexes at middle elevations in Makua, when they studied the Ko'iahi Gulch Complex as one such middle elevation settlement area. These two studies indicate that expanded archaeological surveys not only have the potential of recovering substantially more inland complexes, sites, and features, but they also have the potential to yield significant new information about the pre-contact settlement, land use and social relations in Makua Valley.
- I18-10 The Draft EIS acknowledges that Makua once supported both a coastal population and permanent occupation in the middle elevation. It states that steps were taken to change target objectives to avoid damaging the sites in the Makua Mid-Valley complexes further after the Williams and Patolo survey, but that, since it was in an area of unexploded ordnance it was not accessible until a controlled burn was conducted as part of the survey by Ogden. This 2000 Ogden report recommends that the sites in the Makua mid-Valley complexes should be preserved, protected from further ordnance damage, mapped and further excavated by surface and subsurface excavation.
- I18-11 Fifth, there is no assessment in the Draft EIS of how military training will impact ancestral burial sites and the ability of Native Hawaiian families to care for these sites. Informants speak of unmarked ancestral burials located near the Ukanipo heiau and on lands which were granted to Native Hawaiian families as kuleana under the Mahele. The Ogden archaeological survey (2000) of the Ukanipo Heiau vicinity identified 30 possible unmarked burials in and around the Ukanipo Heiau. (p. 63-65) In addition, the Ogden archaeological survey (2000) for proposed modifications to the company combined assault course and construction of a fire access trail in

Responses

- I18-8 As reflected in the Cultural Impact Assessment conclusions, lack of community input hindered development of that report. The Army's consultant did not cite insufficient time as a factor in the report's findings.
- I18-9 The Army recognizes that areas of MMR that cannot be surveyed may contain cultural resources. More complete archaeological investigations are undertaken whenever possible but may be inaccessible due to the presence of unexploded ordnance or other factors. Those areas which would be directly impacted by the proposed training have been surveyed and assessed and the identified properties are being protected.
- I18-10 The Army acknowledges that areas of MMR that cannot be surveyed may contain cultural resources. More complete archaeological investigations are undertaken whenever possible but may be inaccessible due to the presence of unexploded ordnance or other factors. Those areas which would be directly impacted by the proposed training have been surveyed and assessed and the properties located are being protected.
- I18-11 The training alternatives discussed in the Draft EIS will not have an impact on known burial sites. Monitoring of sites will continue during training and if it appears that impacts may occur further consultation will be undertaken. No group has identified further concerns about burial areas. Although MMR is an active training complex, the Army at this time allows limited public access to cultural sites. Public access depends in part on training requirements, safety and other applicable policy, requirements, regulations/laws.