

Record of Decision

for the Construction and Operation of an Infantry Platoon Battle Course at Pōhakuloa Training Area, Hawai'i

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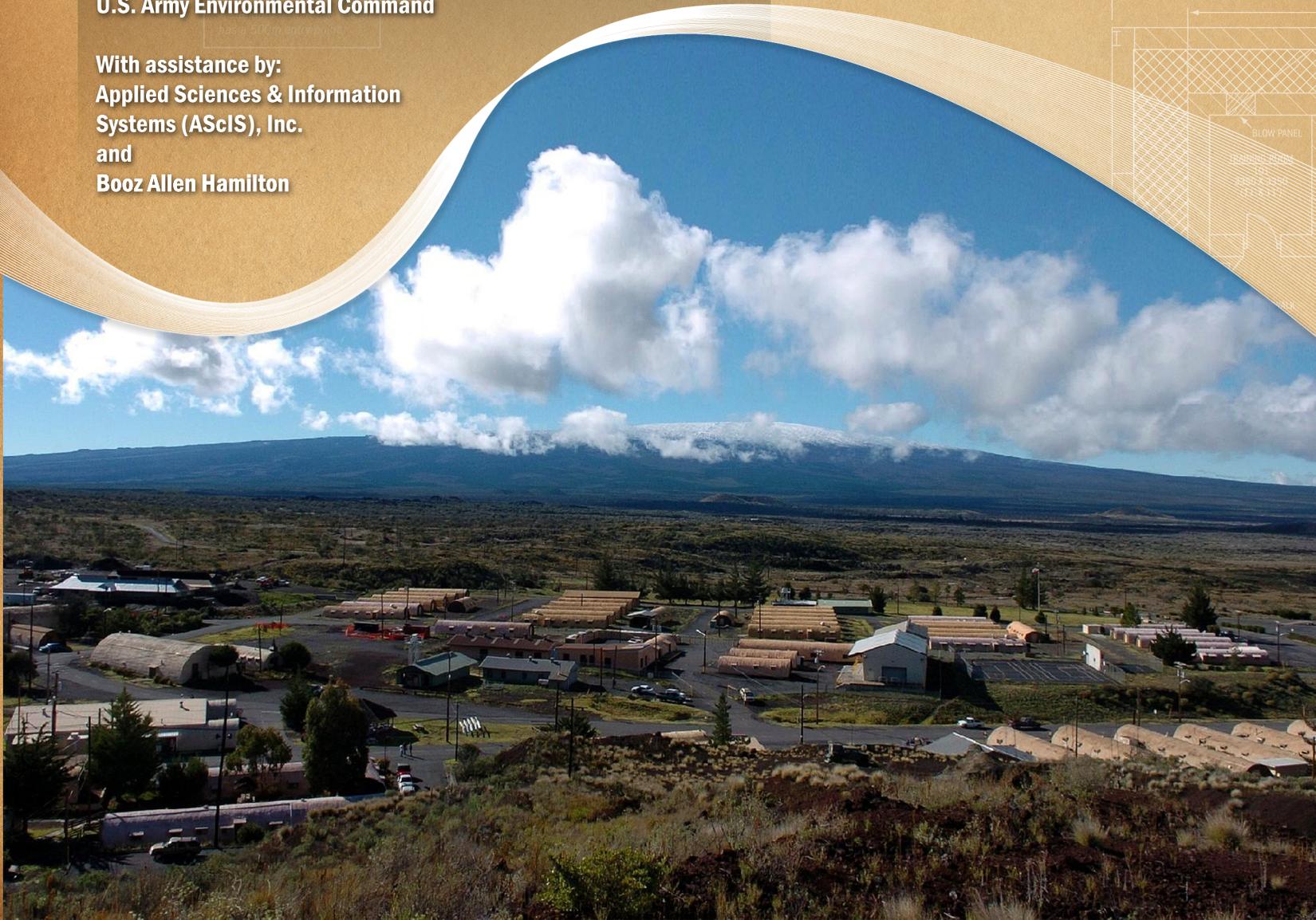
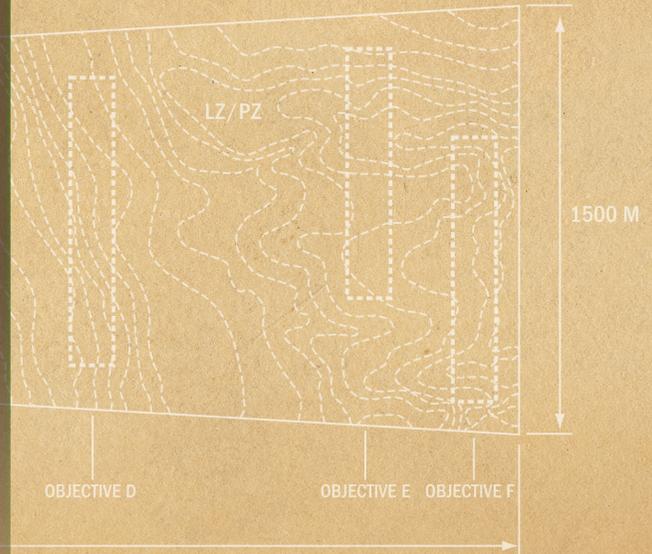


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RECORD OF DECISION

ENVIRONMENTAL IMPACT STATEMENT FOR THE CONSTRUCTION AND OPERATION OF AN INFANTRY PLATOON BATTLE COURSE AT PŌHAKULOA TRAINING AREA, HAWAI'I

1. EXECUTIVE SUMMARY

As the Army's Deputy Commanding General, U.S. Army-Pacific (USARPAC), I have reviewed the *Final Environmental Impact Statement (FEIS) for the Construction and Operation of an Infantry Platoon Battle Course (IPBC) at Pōhakuloa Training Area (PTA), Hawai'i (March 2013)*. This FEIS adequately evaluates the potential environmental and socioeconomic effects of the alternatives for the construction and operation of the IPBC. The FEIS, published on 26 April 2013 is incorporated by reference in this Record of Decision (ROD). This ROD explains that the Army will proceed with its Preferred Alternative identified in the FEIS, the Western Range Area Alternative. Specifically, the Army will construct and operate a new IPBC at Pōhakuloa Training Area, Hawai'i. Constructing and operating an IPBC that meets current Army training requirements best supports the need to reduce a current shortfall in collective (group) live-fire standard training capabilities for units stationed in Hawai'i. As part of the implementation of this decision, the Army will take practical measures to mitigate impacts to protect and sustain the environment.

2. BACKGROUND

PTA, a 132,000 acre (53.4 hectare) multi-function training ground located on the island of Hawai'i, is used by all branches of the U.S. military (including the Army, Marine Corps, Navy, and Air Force) and includes live-fire ranges, an approximately 450 acre (82.1 hectare) airfield, an approximately 100 acre (40.5 hectare) facility area (referred to as the Cantonment Area), and a 51,000 acre (20.6 hectare) artillery impact area. PTA supports full-scale combined arms live-fire and field training military exercises at all levels from squad to brigade for Army Active Component (AC) units stationed in Hawai'i, and supports similar training up to company level for the Army Reserve and Hawai'i Army National Guard (HIARNG) units stationed in Hawai'i. AC training at PTA primarily includes the units of the 25th Infantry Division (ID), composed of the 2/25th Stryker Brigade Combat Team, 3/25th Infantry Brigade Combat Team, and 25th Combat Aviation Brigade. Other units that use PTA include the 94th Army Air and Missile Defense Command, 8th Theater Sustainment Command, 45th Sustainment Brigade, 8th Military Police Brigade, and the 130th Engineer Brigade. PTA is also used by Hawai'i's Emergency First Responders and the Hawai'i Police Department.

The Army needs to reduce a current shortfall in collective (group) live-fire standard training capabilities for units stationed in Hawai'i. To address this shortfall, the Army needs a modern IPBC at PTA. Presently, PTA does not have a range capable of supporting standard collective infantry platoon live-fire training that enables the unit to accomplish its Mission Essential Task List (METL) tasks. The IPBC will allow units to train battle tasks tied to its METL and allow the Army to accomplish its requirement of conducting platoon-level live-fire exercises twice per year. The proposed IPBC would support the live-fire collective training needs of the Army, the Army Reserve, and the HIARNG, as well as other Service components that are stationed or train in Hawai'i.

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The existing IPBC at PTA, located at Range 10, is a non-standard range and does not comply with the current requirements of Army training ranges. Existing targetry and instrumentation at Range 10 are obsolete. The range cannot be expanded at this location because its extension would fall within the Improved Conventional Munitions (ICM) Munitions and Explosives of Concern/Unexploded Ordnance (MEC/UXO) area of the impact area at PTA. A permanent range is not authorized in the ICM area. A standard IPBC has more objectives (e.g., targets, bunkers, etc.) than what is found on Range 10. Range 10 cannot accommodate these extra objectives due to its size and cannot be built to current standards; thus it cannot meet the Army's current doctrinal range design and training standards.

In 2010-2011, the USARPAC requested and received exceptions to the standard design for the IPBC, allowing for a larger entry point and permitting hardened targetry on the IPBC. The enhanced IPBC with a wider range entry point and hardened targetry enables a unit commander to have greater flexibility when designing training scenarios by allowing up to two platoons to use the IPBC at the same time and air-ground integration training scenarios.

The proposed IPBC does not include the stationing of additional Soldiers at PTA, the acquisition of any land, or the expansion of training beyond PTA's existing boundary. Furthermore, the Army does not anticipate a substantial increase in the number of Soldiers that would utilize all of the training ranges at PTA (the overall "throughput" of the training area) as a result of the proposed IPBC.

The Army evaluated alternative locations where this type of range could be built at PTA. The screening criteria considered location and technical viability (Section 2.5.2 of the FEIS) and operational limitations (Section 2.5.3 of the FEIS). Two alternatives met the Army screening criteria, as identified in Section 2.6 of the FEIS.

The Army initiated an EIS in order to support sound decisions for assessing alternatives and implementing these actions with full awareness of environmental and socioeconomic impacts. The FEIS is of appropriate detail to assure that the decisions included in this ROD have been made after the required consideration of relevant environmental information. The FEIS and this ROD comply with the requirements contained in the Council of Environmental Quality regulations that implement the National Environmental Policy Act (NEPA) (40 Code of Federal Regulations [CFR] Parts 1500-1508) and Army NEPA implementing procedures (32 CFR Part 651).

The draft EIS that preceded the FEIS was broader and programmatic in nature. On October 14, 2011, the Army published a Notice of Availability (NOA) of a *Draft Programmatic Environmental Impact Statement (PEIS) for the Modernization of Training Infrastructure and Construction and Operation of an Infantry Platoon Battle Area (IPBA) at Pōhakuloa Training Area (PTA), Hawai'i* in the Federal Register. The Draft PEIS included a Tier 1 programmatic level analysis of future modernization of ranges, training and support infrastructure, and the Cantonment Area. The Draft PEIS only broadly assessed future modernization projects at PTA because the information available for many of these projects was still in the planning stage and funding was not yet programmed. The Draft PEIS also included a Tier 2 project-specific analysis of the construction and operation of an IPBA at PTA, as the first modernization project.

In the Draft PEIS, the IPBC was analyzed as part of a larger IPBA that included a Military Operations on Urban Terrain (MOUT) Assault Course and a live-fire Shoothouse facility. Due to funding constraints, the MOUT Assault Course and Shoothouse are no longer part of the present project. The IPBC is the only part of the IPBA analyzed in the FEIS.

A number of factors caused the Army to carefully reconsider the programmatic portion of this analysis: the highly uncertain nature of the future projects in the modernization program, a rapidly changing austere fiscal environment, as well as the many public and agency comments received on the Draft PEIS. After thorough consideration of all of these factors, Army leadership decided not to proceed with the programmatic portion of the EIS.

The FEIS analyzed only the site-specific construction and operation of an IPBC at PTA, Hawai‘i.

3. PROPOSED ACTION

The Army’s proposed action is to construct and operate an IPBC that meets current Army standards at PTA. An IPBC supports unit collective (group) live-fire training. The IPBC is used to train and test infantry platoons and other small units on the skills necessary to conduct tactical movement techniques and detect, identify, engage, and defeat stationary and moving infantry and armor targets in a tactical array. Soldiers would engage targets with small-arms, machine gun, and other weapon systems as part of live-fire exercises and air-ground integration training. In addition to live-fire, the range would also be used for training with sub-caliber and/or laser training devices. The unit actions are recorded on video, and the target engagements are scored in order to provide the unit commander a complete after action review package. Immediate feedback and a take-home after action review package are critical to effective training.

4. ALTERNATIVES ANALYZED

To address the Army’s need to reduce a current shortfall in collective (group) live-fire standard training capabilities for units stationed in Hawai‘i, the Army proposed eight action alternatives and a No Action Alternative. In the Draft PEIS published in October 2011 the Army screened out five of the initial alternatives for the proposed IPBC and focused the analysis to three alternatives, including an alternative named “Southwest of Range 20.” This third alternative was determined later to be operationally unfeasible.

When developing the range alternatives, the Army used the site screening criteria outlined in Section 2.5 of the FEIS. Section 2.5 in the FEIS provides information on project-specific alternatives considered but eliminated from analysis, including Southwest of Range 20. Two alternatives met the Army screening criteria, as identified in Section 2.6 of the FEIS. During initial planning, efforts were made to avoid siting the proposed IPBC in locations with particular environmental resources, such as protected species habitat and cultural resources sites. The Army determined that the alternatives below were reasonable alternatives.

4.1 Alternative 1: Western Range Area Alternative

Under this alternative, the Army would construct and operate the IPBC at the Western Range Area Alternative location (Preferred Alternative). The analysis for the proposed IPBC included all required infrastructure to operate the range.

The Western Range Area Alternative is selected because this site better supports operational needs than the Charlie Circle Alternative. This alternative is best suited to dismounted infantry operations because it is more tactically realistic in providing assault objectives, fields of fire, and covered avenues of approach and therefore provides the greatest training benefit. The ground is also primarily comprised of 'a'ā lava, which is much more susceptible to softening and at a much lower cost than the pāhoehoe lava found at Charlie Circle.

In addition, this alternative would result in fewer impacts on cultural and natural resources than the Charlie Circle Alternative location. The Surface Danger Zones (SDZs) for the IPBC are also more fully contained within the impact area. Cultural resources and listed plant species surveys were conducted and both were found to be present on the proposed range area, but impacts on these resources can be avoided or mitigated.

4.2 Alternative 2: Charlie Circle Alternative

Under this alternative, the Army would construct and operate the IPBC at the Charlie Circle Alternative location. The analysis for the proposed IPBC included all required infrastructure to operate the range.

The Charlie Circle Alternative location shares part of the same proposed footprint as the Western Range Area Alternative, with similar characteristics in ground cover (e.g., vegetation and volcanic rock) and topography as the Preferred Alternative; however, overall this alternative is not as conducive to training as the Western Range Area Alternative. This area has inadequate terrain to properly support fields of fire, the available avenues of approach do not provide as much cover, and the areas for objectives are more dispersed and cannot be as easily observed or controlled. The area has a large amount of pāhoehoe lava which is harder to soften than the 'a'ā lava found in the Western Range Area Alternative location.

The Army surveyed for cultural resources and listed plant species and both were found to be present on the proposed range area. Based on these surveys, the Army determined that the Charlie Circle Alternative would result in greater adverse environmental impacts than the Western Range Area Alternative for the following reasons:

- The nearest range to the Charlie Circle Alternative is Training Area 23. The estimated SDZ for Charlie Circle would encroach upon Training Area 23 to a greater degree than the Western Range Area Alternative, posing more potential fire risk to federally-listed species present there. It is therefore prudent to avoid using flammable ammunition types in this area if possible.
- The Charlie Circle Alternative would have a greater impact on the listed plant species because approximately half of the 26 acres (10.5 hectares) of the endangered species Hawaiian parsley (*Spermolepis hawaiiensis*) surveyed would be in the IPBC footprint.
- The lava tubes generally run parallel to the length of the Charlie Circle Alternative; this makes impacts to lava tubes more difficult to avoid because the design of the IPBC would run parallel to or over the length of the tubes (Figure 4.10-4 of the FEIS). In addition, human remains were recently discovered in a lava tube within the Charlie Circle Alternative; no remains have been found at the Western Range Area Alternative.

4.3 No Action Alternative

Under the No Action Alternative, the Army would not construct the IPBC. The No Action Alternative serves as a snapshot of the existing training environment, infrastructure, and facilities at PTA, and therefore provides the benchmark for comparison of the environmental impacts of the action alternatives. The No Action Alternative does not meet the purpose and need for the proposed action. Without a standard IPBC, units of the 25th ID could not meet all doctrinally-required collective training tasks, and would not be sufficiently prepared to succeed in combat. Without the IPBC, units training at PTA would continue to use the existing Range 10 IPBC as efficiently as possible, prior to deploying to the operational environment. The No Action Alternative is the environmentally preferred alternative.

5. PUBLIC INVOLVEMENT

The Army provided federal and state agency stakeholders, the public, and other interested parties the following notifications and opportunities for involvement during the preparation of the EIS:

- The Army published the Notice of Intent (NOI) to prepare the PEIS in the Federal Register on December 23, 2010. The notice described that the Army will address the environmental impacts associated with modernization activities at PTA and specifically the proposed IPBA and its alternative locations. The NOI included an announcement of public scoping meetings on Hawai‘i Island. The Army published notices in local newspapers *West Hawai‘i Today* and *Hawai‘i Tribune-Herald* on 28 and 29 December 2010.
- The Army held public scoping meetings on Hawai‘i Island over a two-day period on January 11, 2011, at the Hilo Intermediate School cafeteria and on January 12, 2011, at the Waimea Elementary School cafeteria. An open information session preceded each public scoping meeting and allowed attendees to review posters that described the proposed action, the EIS process, alternatives considered, and cultural and natural resources concerns. In addition, the public was provided the opportunity to voice their concerns in either written or oral testimony to Army representatives.
- The NOA for the Draft PEIS was published in the Federal Register on October 14, 2011. The NOA stated that the Army’s draft document addressed the potential environmental impacts associated with modernization activities at PTA. In addition, the NOA identified the dates and locations for the public hearings on Hawai‘i Island and the 45-day comment period timeframe (October 14 – November 30, 2011). The Army published notices announcing the availability of the Draft PEIS for review and public hearing information in local daily newspapers to coincide with the publication of the NOA in the Federal Register. The notices were published in the *West Hawai‘i Today* and *Hawai‘i Tribune-Herald* on October 14-15, 2011.
- The Army held public hearings on Hawai‘i Island over a two-day period on November 8, 2011, at Aunt Sally’s Kaleohano’s Luau Hale, and on November 9, 2011, at the Waimea Elementary School cafeteria. Similar to the scoping meetings, each public hearing was preceded by an open information session allowing citizens to review posters related to the project with EIS team members available for one-on-one conversations to discuss their concerns. Public comments were accepted by the Army in either written format or oral testimony. Appendix B of the FEIS includes the comments received.

- Public review and comment on the Draft PEIS occurred from October 14 through November 30, 2011. Comment responses from the Government are included in Appendix C of the FEIS.
- The NOA for the FEIS was published in the Federal Register on 26 April 2013.
- The FEIS was made available on the U.S. Army Garrison-Hawai‘i (USAG-HI) website, with hard copies provided to Hawai‘i Island local libraries in major population areas. Notifications announcing the 30-day waiting period were mailed to federal and state agencies and members of the public who had expressed interest in the project. Although the 30-day waiting period is not a formal public comment period, the Army accepted comments received during this period to be considered with the Army’s decision as documented in this ROD.
- A public notice was published in the *West Hawai‘i Today and Hawai‘i Tribune-Herald* on 26-27 April 2013.
- The NOA of this ROD will be published in the Federal Register and this ROD will be made available (with the FEIS) on the USAG-HI website and at Hawai‘i Island local libraries in major population areas. A press release will be issued and a public notice will be published in local newspapers. Notifications will be mailed to federal and state agencies and members of the public who had expressed interest in the project.

6. DECISION FOR THE CONSTRUCTION AND OPERATION OF AN INFANTRY PLATOON BATTLE COURSE AT PŌHAKULOA TRAINING AREA, HAWAI‘I

I have considered the results of the analysis in the FEIS, supporting studies, public comments, and the Army mission requirements. Based on this review, I have decided to proceed with Alternative 1. Specifically, I have decided that the Army will construct and operate an IPBC at the Western Range Area of PTA, Hawai‘i. In implementing this decision, the Army will take practical measures to mitigate impacts to protect and sustain the environment. Mitigation commitments are discussed in Section 9.0 below.

My decision to implement the Western Range Area Alternative, as specified above, is based on the following considerations:

- First, as the Army moves toward a sustainable operational tempo and begins to draw down forces overseas, units will redeploy to Hawai‘i. Training ranges, training infrastructure, and training support facilities must be readily accessible and up to standard for units during their “dwell time” (or time spent at home station to reset and retrain). Constructing and operating the proposed IPBC provides the proper balance for addressing the shortfall in collective (group) live-fire standard training capabilities for units stationed in Hawai‘i, and optimizes training readiness by providing a training range that is readily accessible and up to standard so that units using PTA can meet their doctrinal training requirements.
- Second, as noted above, the terrain of the Western Range Area Alternative is more favorable for dismounted operations than the Charlie Circle Alternative because it provides a terrain layout that is tactically more conducive to training.
- Third, I have considered the impacts to biological and cultural resources. As explained below, construction and operation of the IPBC at the Western Range Area Alternative would result in fewer impacts to these resources compared with the Charlie Circle Alternative.

Other alternatives eliminated from further consideration are discussed in Section 2.5 of the FEIS. The No Action Alternative is the “environmentally preferred alternative,” but as previously stated, it does not meet the purpose and need for the proposed action. Consequently, I did not select this alternative.

7. ENVIRONMENTAL CONSEQUENCES

Potential direct, indirect, and cumulative impacts of the proposed action and alternatives were identified in the analysis and public comments process during the development of the EIS. The FEIS analyzed the effects of the proposed action and alternatives on the following Valued Environmental Components (VECs): land use, air quality, noise, geology and soils, water resources, biological resources (including threatened and endangered species), cultural resources, socioeconomics, transportation and airspace, utilities, and hazardous and toxic substances. The FEIS also identified mitigation measures to address potential adverse impacts from implementation of the proposed action.

Baseline conditions and effects to areas surrounding the installation are described and considered, as appropriate, based on the Region of Influence for environmental resource areas. For instance, effects on cultural resources would primarily occur within the installation boundary, but effects on other resource areas, such as socioeconomics and transportation, could be regional. Cumulative effects involve a broader analysis of resource areas, combining a historic perspective with past, present, and reasonably foreseeable future effects for each resource area. Cumulative effects analyses included consideration of the installation and surrounding areas.

The effects have been fully evaluated in the FEIS. Implementation of this proposed action is expected to result in direct, indirect, and cumulative impacts on PTA and nearby areas.

In making this decision, I am aware of the potential environmental and socioeconomic effects associated with the implementation of the proposed action and alternatives. I am aware that unavoidable adverse impacts could occur as a result of implementing this decision. These impacts could include the generation of fugitive dust and other pollutants during construction and training, loss of or harm to vegetation and a reduction in the acreage of native plant communities as a result of construction and training, loss of or harm to wildlife and wildlife habitat as a result of construction and training, loss of or harm to special status species as a result of training, damage to or destruction of cultural resources as a result of construction and training, increased noise levels and disturbance from construction and training, a temporary increase in on-road and off-road traffic as a result of construction activities, and an increase in hazardous wastes (primarily lead from small arms ammunition) as a result of training.

The Army consulted with the U.S. Fish and Wildlife Service (USFWS) about mitigation measures to protect federally-listed species. On 11 January 2013 the USFWS issued a Biological Opinion (BO) pursuant to Section 7 of the Endangered Species Act for the proposed action (Appendix G of the FEIS). The BO contains the mitigation measures the Army will implement during the construction and operation of the IPBC. By implementing conservation and avoidance mitigation measures, impacts will be reduced to less than significant levels. These measures are more fully described in Section 9.0 of this ROD. The BO also contains mitigation measures required to protect the nēnē (Hawaiian goose). These measures apply to the entire installation of PTA. Impacts to the nēnē, as a result of the proposed IPBC, are anticipated to be negligible.

I have also considered the potentially significant impacts that could occur to biological resources at both alternative sites. Federally-listed plant species were found to occur on both the Western Range Area and Charlie Circle Alternative locations, and construction and operation of the IBPC could result in potentially significant impacts to individuals of these species. The Charlie Circle Alternative, however, would have a greater impact on individuals of listed plant species because approximately half of the 26 acres (10.5 hectares) of the endangered Hawaiian parsley (*Spermolepis hawaiiensis*) surveyed would be in the Charlie Circle IPBC footprint. In addition, the estimated SDZ for Charlie Circle would encroach upon Training Area 23 to a greater degree than the Western Range Area Alternative, posing more potential fire risk to federally-listed species present there.

Both action alternatives would result in significant impacts on cultural resources; however, the Western Range Area Alternative (Preferred Alternative) involves fewer impacts on cultural resources than the Charlie Circle Alternative location. There are more opportunities to avoid impacts to lava tubes through construction design at the Western Range Area Alternative because the tubes generally run perpendicular to the length of the range (Figure 4.10-1 of the FEIS). The tubes can either be avoided entirely or the crossing points can be limited. Conversely, the lava tubes generally run parallel to the length of the Charlie Circle Alternative; this makes impacts to lava tubes more difficult to avoid because the design of the IPBC would run parallel to or over the length of the tubes (Figure 4.10-4 of the FEIS). Overall, adverse impacts to the lava tubes are more easily avoided or reduced utilizing the Western Range Area Alternative, and with less impact to the quality of Soldier training when compared with the Charlie Circle Alternative. Human remains were recently discovered in a lava tube within the Charlie Circle Alternative; no remains have been found at the Western Range Area Alternative.

The Army consulted with the State Historic Preservation Division (SHPD), the Advisory Council on Historic Preservation (ACHP), and other consulting parties, including Native Hawaiian organizations to determine mitigation for those effects. As a result of the consultation, the Army and the consulting parties signed a Programmatic Agreement (PA) on 26 June 2013, pursuant to Section 106 of the National Historic Preservation Act (NHPA). The PA establishes how the remaining steps to the Section 106 consultation will be completed, and what mitigation measures are required to be taken by the Army for the potential adverse effects on cultural resources. An earlier version of the PA is included in Appendix D of the FEIS.

I have considered that significant but mitigable impacts would occur to air quality, hazardous materials and waste, and from increased potential for wildfires as a result of either action alternative. The remaining resources (VECs) were found to experience less than significant impacts. A positive impact has been determined for the No Action Alternative because cultural resources discovered during the archaeological surveys will now be included in the Army's inventory, and be protected and managed accordingly. Table 7-1 provides the anticipated direct and indirect impacts that may occur for each alternative. The potential impacts on all resources analyzed are found in detail in Section 4.0 of the FEIS.

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Table 7-1. Anticipated Direct and Indirect Impacts to VECs from Construction and Operation of an IPBC for Each Alternative

Valued Environmental Components Analyzed	IPBC at Western Range Area Alternative	IPBC at Charlie Circle Alternative	No Action Do Not Build IPBC
Land Use/Recreation	○	⊗	○
Airspace	○	○	○
Visual Resources	⊙	⊙	○
Air Quality	⊗	⊗	○
Noise	⊙	⊙	○
Traffic/Transportation	⊙	⊙	○
Water Resources	⊙	⊙	○
Geology/Soils	⊙	⊙	○
Biological Resources	⊗	⊗	○
Cultural Resources	⊗	⊗	+
Hazardous Materials/Waste	⊗	⊗	○
Depleted Uranium	○	○	○
Socioeconomics/Env. Justice	○+	○+	○
Public Services/Utilities	⊙	⊙	○
Wildfires	⊗	⊗	○
Sustainability	○-⊙	○-⊙	○

LEGEND

- ⊗ = Significant impact
- ⊗ = Significant impact mitigable to less than significant
- ⊙ = Less than significant impact
- = No impact
- + = Beneficial impact

NOTE: More than one symbol indicates a range of impacts.

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Cumulatively, potential environmental impacts associated with constructing and operating the IPBC, when considered along with other past, present, and foreseeable future actions, include significant impacts regarding biological resources, cultural resources, and wildfires at PTA. Table 7-2 provides the range of cumulative impacts from No Impact to Significant Impact that may occur for various reasons in each resource area. A detailed discussion of cumulative environmental impacts can be found in Section 5.0 of the FEIS.

Table 7-2. Summary of Potential Cumulative Impacts

Valued Environmental Resources Considered	Cumulative Impacts
Land Use/Recreation	⊙
Airspace	○
Visual Resources	⊙
Air Quality	⊙⊙
Noise	○○
Transportation/Traffic	⊙⊙
Water Resources	⊙
Geology/Soils	⊙⊙
Biological Resources	⊙⊙⊗+
Cultural Resources	⊗
Hazardous Materials/Waste	⊙⊙
Depleted Uranium	○○
Socioeconomics/Env. Justice	○○+
Public Services/Utilities	⊙
Wildfires	⊙⊙⊗+
Sustainability	⊙+

LEGEND

- ⊗ = Significant impact
- ⊙ = Significant impact mitigable to less than significant
- = Less than significant impact
- = No impact
- + = Beneficial impact

NOTE: More than one symbol indicates a range of impacts.

8. PUBLIC COMMENTS ON THE DRAFT PEIS AND THE FEIS

The vast majority of public comments on the Draft PEIS regarded the programmatic portion of that analysis. The Army considered the public comments that were relevant to the proposed IPBC to inform the FEIS. In particular, in response to public comments on the Draft PEIS, the Army conducted additional field investigations in order to determine the feasibility of constructing the IPBC at two of the alternative locations. These investigations are fully addressed in the FEIS in Section 3.5 Noise, Section 3.9 Biological Resources, Section 3.10 Cultural Resources, and Section 3.11 Hazardous Materials.

During the waiting period following publication of the FEIS, the Army received a few additional comments. I took all of these new comments, and those received during the EIS scoping and comment process, into consideration in making my decision.

The U.S. Environmental Protection Agency (USEPA) submitted two comments. The first comment noted that PTA does not have a stormwater management plan, as indicated in Section 3.7.1 of the Final EIS. Development of such a plan is underway. In the meantime, the construction of the IPBC will require a National Pollutant Discharge Elimination System permit and will meet any applicable requirements of section 438 of the Energy Independence and Security Act.

The USEPA's second comment requested that the Army specifically commit to the control of particulate matter, such as fugitive dust transmission from construction. The USEPA's concerns were noted and I have decided to reflect this requirement specifically under Section 9 of this ROD, Mitigation Commitments. The Army will undertake mitigation, such as applying water or a dust palliative, during construction activities and along sections for the access route and interconnecting roads associated with the IPBC during operation, as needed. Both are standard Best Management Practices (BMPs) practiced by the Army during construction and operation.

Several comments received during the waiting period dealt with depleted uranium (DU) which is in a part of PTA at least 3.75 miles (6.0 kilometers) away from the IPBC site. There is no evidence that there is DU at the selected IPBC site. This means that the proposed action will not have any effect on the DU at PTA. Neither construction nor use of the IPBC could cause DU migration or any other human exposure to DU. Nevertheless, PTA's DU is the subject of a Nuclear Regulatory Commission licensing process. This process, which includes public participation, is ongoing and is expected to be completed soon.

Another commenter noted the U.S. involvement in the overthrow of the Hawaiian Kingdom in 1893. The EIS addresses this issue in Section 3.10.3.3. Although the U.S. Congress apologized for the overthrow in 1993, the end of the royal government was over 120 years ago.

One commenter expressed concern about the methodology used to identify traditional cultural properties and properties of traditional religious and cultural importance, and raised issues of the adequacy of the Army's consultation with Native Hawaiian organizations. As explained in detail in Section 4.10 of the FEIS, the Army complied with its NHPA obligations through its extensive consultation with Hawai'i SHPD, the Office of Hawaiian Affairs, the ACHP, and other consulting parties to participate in the process. The result of that consultation is a PA, signed on 26 June 2013, detailing how the Army will manage cultural resources. Cultural resource mitigation commitments are summarized in Section 9 of this ROD.

In addition, the Army notes the following corrections to the Final EIS dated March 2013.

- In Volume II of the printed document, page C-18 is included twice and the document is missing pages C-20 to C-28. These pages include the Government responses to comment letters from USEPA; Calvin K.Y. Say, Speaker, House of Representatives, State of Hawai‘i; Stephanie Nagtata, Interim Director, Office of Kea Management, University of Hawai‘i at Hilo; and Robert A. McLaren, Associate Director, Office of the Institute for Astronomy, University of Hawai‘i, Manoa. A complete Appendix C was included in the electronic submittal to USEPA, recipients' CDs, and on the project website.
- The FEIS incorrectly states at one point that particles smaller than 5 microns in size are not respirable. Particulate matter smaller than about 10 micrometers (microns), referred to as PM₁₀ or "inhalable" or "coarse" (Chapter 3.4 of the EIS) can settle in the bronchi and lungs. Particles smaller than 2.5 micrometers (referred to as "fine" in Chapter 3.4 of the EIS), PM_{2.5}, tend to penetrate into the gas exchange regions of the lung, and are sometimes referred to as respirable. The definitions of particulate matter in Chapter 11 may have made this distinction appear over-complicated. The table on page 3-19 has the annual primary standard for Fine PM (PM_{2.5}) as 15. A new standard of 12 was announced on 14 December 2012 and was published as a final rule in the Federal Register on 15 January 2013.

The comments received on the FEIS did not raise any significant new issues that would require supplementation of the FEIS. I evaluated all the comments and new information received (summarized above); the new information did not lead me to reconsider other alternatives or new mitigation measures except as otherwise indicated.

9. MITIGATION COMMITMENTS

The Army is committed to sustaining and preserving the environment at PTA. All practicable means to avoid or minimize environmental harm from the selected alternative have been adopted, as described below. All requirements set forth in this ROD requiring the expenditure of Army funds are expressly subject to the availability of appropriations and the requirements of the Anti-Deficiency Act (31 United States Code [U.S.C.] § 1341). No obligation undertaken by the Army under this ROD will require or be interpreted to require a commitment to expend funds not obligated for a particular purpose.

The installation has an active environmental management program that employs a full array of BMPs, Standard Operating Procedures (SOPs), and environmental management programs to ensure environmental compliance, stewardship, and sustainability of those areas potentially impacted by the construction and operation of an IPBC. As part of the decision to proceed with the Preferred Alternative specified in Section 6.0 above, unless noted below in Section 10.0, the Army will continue to implement all existing mitigation measures, BMPs, SOPs, and environmental management programs to minimize the impacts of the proposed action. Existing and recommended mitigations, BMPs, SOPs, and environmental programs are presented in Section 4.18 of the FEIS. The BO and PA describe additional mitigation measures in detail. The Army will comply with the requirements, terms, and conditions in these documents. The requirements of the BO and PA, as well as other mitigation measures the Army will undertake are summarized below.

9.1 Biological Resources

- To reduce impacts on Hawaiian geese, the BO contains several requirements that apply generally to all of PTA and are not specific to the IPBC. Requirements include, entering into a conservation partnership project with the USFWS for Hawaiian geese; briefing leaders of their responsibility to protect Hawaiian geese; designating a leader observing range performance during training to ensure Hawaiian geese will not be directly targeted; ceasing training if a take is observed; and, reporting take of a Hawaiian goose to the USFWS.
- To reduce impacts from training to listed plant species and their habitats, conduct seed collection, listed plant species propagation, out-planting, ex-situ genetic storage, and site management.
- To reduce impacts from training on listed plant species and their habitats, build avoidance of known plant species into infrastructure design to the extent practicable in terms of construction schedule and cost.
- To reduce impacts from training on the Hawaiian hoary bat and Hawaiian petrels, require use of low lights and minimal use of lights, and avoid tree trimming between June 1 and September 15. Complete ongoing bird studies, train and educate troops about the species, avoid use of smoke obscurants within 165 feet (50 meters) of trees, place military targets away from trees, and avoid use of barbed wire.
- Provide in-briefing materials to ensure units using the IPBC can identify listed plant and animal species and their habitats.
- To reduce spread of invasive species, educate contractors to wear weed-free clothes and maintain weed-free vehicles, inspect and wash all vehicles at wash-rack facilities prior to leaving PTA, invasive animal control protocols, and continued implementation of Integrated Natural Resource Management Plans and Range Training Land Assessment / Land Rehabilitation and Maintenance plans to minimize and rehabilitate vegetation damage. Construction areas and roads will be surveyed quarterly during construction and annually after range construction. New weed introductions will be prioritized and target species ranked for management.
- Dust caused by construction activities will be controlled during construction following standard BMPs that prescribe the use of periodic application of water or dust control palliative products. Dust caused by operation of the IPBC will also be controlled along sections of the access route and interconnecting roads associated with the IPBC, using palliative products over a distance of 6 to 8 miles (9.6 to 12.9 kilometers), as needed.

In addition, the Army will consider the additional conservation recommendations suggested by USFWS.

9.2 Cultural Resources

- Conduct an additional survey of the project area in the selected alternative prior to construction to identify previously unidentified historic properties in the project area, determine the ability to avoid historic properties, and ensure that known historic properties to be avoided are clearly marked for avoidance.
- Complete determinations of eligibility for properties identified in the project area. Provide the opportunity for consulting parties to visit the vicinity of the project during the consultation on the determinations of eligibility in accordance with the PA.
- Develop and implement a data recovery plan for a sample of historic properties that may be affected (or impacted) by construction activities and refine site significance standards. Develop educational briefs for construction personnel; require construction personnel to notify USAG-Pōhakuloa (USAG-P) Cultural Resources staff or USAG-HI Cultural Resources Manager if previously unidentified cultural resources are encountered by any employee (or contractor), and follow procedures in the PA. This provides the potential to identify previously unidentified historic properties, and to allow for consultation under Native American Graves Protection and Repatriation Act and NHPA, if required.
- Develop a long-term operational monitoring program of three target arrays to evaluate training activities on historic properties. Develop unit briefs regarding cultural sensitivity and cultural resources avoidance.
- If human remains, associated and/or unassociated funerary objects, sacred objects, and/or objects of cultural patrimony (Cultural Items) are encountered by any employee (or contractor in the employ of) USAG-P, USAG-HI or USARPAC during project implementation, all activity in the vicinity of the discovery will cease and USAG-P Cultural Resources Manager will be contacted immediately. Adoption of this mitigation measure ensures adherence to NAGPRA.

9.3 Hazardous and Toxic Substances

- To ensure construction worker and Soldier safety when operating within the IPBC footprint, known MEC/UXO will be removed/destroyed at the proposed IPBC site within a 20-foot (6.1-meter) to 30-foot (9.1-meter) buffer area surrounding the IPBC access road, Range Operations Control Area, and IPBC trails, objectives, firing points, and targets.

9.4 Wildfires

- To reduce potential for wildfires, the Army will adhere to the requirements of the BO, to include the fire threat minimization measures in the Installation Integrated Wildland Fire Management Plan. Wildland fire risk on the IPBC will be mitigated through a system of fuels monitoring corridors and a constructed firebreak.
- Continue Soldier education to reduce potential for wildfires. Training units will be provided with informational brochures to increase Soldier awareness of the threat that wildfires pose to natural and cultural resources. Soldiers will be briefed prior to training about fire prevention and fire danger-rating restrictions of incendiary ammunition, smoking, and other ignition sources.

For all of the mitigation above, the Army will adopt a monitoring and enforcement program in accordance with 32 CFR Part 651.15.

10. MITIGATION NOT CARRIED FORWARD FOR IMPLEMENTATION

All practicable means to avoid or minimize environmental harm have been adopted, with one exception. The mitigation measure below was identified as a proposed mitigation measure in Section 4.18 of the FEIS; due to cost and safety concerns this measure is not reasonable to carry forward while the ranges and impact area at PTA are still active.

10.1 Hazardous and Toxic Substances

- To reduce potential for lead contamination, provide monitoring and additional studies to better characterize the potential hazards from lead contamination or other munitions constituents; and if necessary, take remedial action.

11. SIGNATURE PAGE

I have considered the results of the analysis in the FEIS, supporting studies, and comments provided during public comment and review periods, and the Army mission requirements. Based on this review, I have determined that Alternative 1, as specified in Section 6.0 above, best meets the purpose and need for the proposed action. This decision provides the proper balance for addressing the shortfall in collective (group) live-fire standard training capabilities for units stationed in Hawai'i, and optimizes training readiness by providing training ranges that are readily accessible and up to standard so that units using PTA can meet their doctrinal training requirements.

Approved By:



Roger F. Mathews
Major General, U.S. Army
Deputy Commanding General
U.S. Army Pacific

28 Jun 2013

Date

Concurred By:



Joe Capps
Executive Director
U.S. Army Installation Management Command

10 Jul 13

Date

Record of Decision

12. ACRONYMNS

Acronym	Full Phrase
AC	Active Component
ACHP	Advisory Council on Historic Preservation
BMP	Best Management Practice
BO	Biological Opinion
CFR	Code of Federal Regulations
DU	depleted uranium
EIS	Environmental Impact Statement
FEIS	Final Environmental Impact Statement
HIARNG	Hawai'i Army National Guard
ICM	Improved Conventional Munitions
ID	Infantry Division
IPBA	Infantry Platoon Battle Area
IPBC	Infantry Platoon Battle Course
MEC/UXO	Munitions and Explosives of Concern/Unexploded Ordnance
METL	Mission Essential Task List
MOUT	Military Operations on Urban Terrain
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NOA	Notice of Availability
NOI	Notice of Intent
PA	Programmatic Agreement
PEIS	Programmatic Environmental Impact Statement
PM ₁₀	inhalable particulate matter (10 microns)
PM _{2.5}	fine particulate matter (2.5 microns)
PTA	Pōhakuloa Training Area
ROD	Record of Decision
SDZ	Surface Danger Zone
SHPD	State Historic Preservation Division
SOP	Standard Operating Procedure
U.S.	United States
USAG-HI	United States Army Garrison-Hawai'i
USAG-P	United States Army Garrison-Pōhakuloa
USARPAC	United States Army Pacific
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
VEC	Valued Environmental Component

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