

### Comments

### Responses

Letter  
L1

#### CITY AND COUNTY OF HONOLULU

DEPARTMENT OF DESIGN AND CONSTRUCTION

850 SOUTH KING STREET, 11<sup>TH</sup> FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 523-4584 • Fax: (808) 523-4567  
Web site: www.co.honolulu.hi.us

JEREMY HARRIS  
MAYOR



TIMOTHY E. STEINBERGER, P.E.  
DIRECTOR

October 20, 2003

Ms. Cindy S. Barger  
SBCT EIS Project Manager  
U.S. Army Corps of Engineers  
Honolulu District  
Bldg. 230, Rm. 306 ATTN: CEPOH-PP-E  
Ft. Shafter, Hawaii 96858-5440

Dear Ms. Barger:

This is in response to your request for comments on the Draft Environmental Impact Statement detailing the impacts of Army Transformation in Hawaii.

The selection of Hawaii as one of six locations for an interim force based on the Stryker vehicle, called a Stryker Brigade Combat Team (SBCT), is not expected to have an environmental impact on the operations of City and County of Honolulu governmental facilities.

L1-1

U.S. Army training activities on Oahu, particularly in the Schofield Barracks area, have been an accepted part of the scene for the last 100 years. It does not appear that the conversion to SBCT, particularly in the remote training areas, will significantly alter the existing operation of public facilities.

Should you have any questions, please contact Don Griffin of the Facilities Division, at 527-6324.

Very truly yours,

TIMOTHY E. STEINBERGER, P.E.  
Director

TES:gc

L1-1

We thank you for your comment and participation in this public process. Your comment has been considered and included in the administrative record for this process.

Comments

Responses

Letter  
L2

JEREMY HARRIS  
MAYOR

0192



DEPARTMENT OF PLANNING AND PERMITTING  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET • HONOLULU, HAWAII 96813  
TELEPHONE: (808) 523-4414 • FAX: (808) 527-6743 • INTERNET: www.cc.honolulu.hi.us

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ERIC G. CRISPIN, AIA  
DIRECTOR

BARBARA KIM STANTON  
DEPUTY DIRECTOR

2003/ELOG-3167 (MW)

January 2, 2004

Ms. Cindy S. Barger  
SBCT EIS Project Manager  
U.S. Army Corps of Engineers  
Honolulu District  
Building 230, Room 306 ATTN: CEPOH-PP-E  
Ft. Shafter, Hawaii 96858-5440

Dear Ms. Barger:

Draft Environmental Impact Statement for the Transformation of the 2<sup>nd</sup>  
Brigade, 25<sup>th</sup> Infantry Division (L) to a Stryker Brigade Combat Team in Hawaii

L2-1 |

We have no comments on the draft EIS.

Should you have any questions, please contact Mike Watkins of our Policy Planning Branch at 523-4406.

Sincerely yours,

ERIC G. CRISPIN, AIA  
Director of Planning and Permitting

EGC:lh  
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L2-1

We thank you for your comment and participation in this public process. Your comment has been considered and has been included as part of the administrative record for this process.

### Comments

Letter  
L3

JEREMY HARRIS  
MAYOR

FIRE DEPARTMENT  
**CITY AND COUNTY OF HONOLULU**  
3375 KOAPAKA STREET, SUITE H425 • HONOLULU, HAWAII 96819-1869  
TELEPHONE: (808) 831-7761 • FAX: (808) 831-7750 • INTERNET: www.honolulufire.org



#22



ATTILIO K. LEONARDI  
FIRE CHIEF

JOHN CLARK  
DEPUTY FIRE CHIEF

October 17, 2003

Ms. Cindy S. Barger  
SBCT EIS Project Manager  
U.S. Army Corps of Engineers  
Honolulu District  
Building 230, Room 306  
Attention: CEPOH-PP-E  
Fort Shafter, Hawaii 96858-5440

Dear Ms. Barger:

Subject: Draft Environmental Impact Statement  
Transformation of the 2<sup>nd</sup> Brigade,  
25<sup>th</sup> Infantry Division (L) to a Stryker Brigade Combat Team in Hawai'i

We received your letter dated October 3, 2003, requesting our comments on the above-mentioned project.

L3-1

The Honolulu Fire Department has no comments, as we do not have any jurisdiction on federal property.

Should you have any questions, please call Battalion Chief Lloyd Rogers of our Fire Prevention Bureau at 831-7778.

Sincerely,

ATTILIO K. LEONARDI  
Fire Chief

AKL/SK:bh

### Responses

L3-1

We thank you for your comment and participation in this public process. Your comment has been considered and has been included as part of the administrative record for this process.

Comments

Responses

Letter L4



DEPARTMENT OF WATER SUPPLY • COUNTY OF HAWAII

345 KEKUAHAOA STREET, SUITE 20 • HILO, HAWAII 96720  
TELEPHONE (808) 961-8050 • FAX (808) 961-8657

December 23, 2003

U.S. Army Corps of Engineers  
Honolulu District  
Building 230, Room 306  
Fort Shafter, HI 96858

DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)  
TRANSFORMATION OF THE 2<sup>ND</sup> BRIGADE, 25<sup>TH</sup> INFANTRY DIVISION TO A STRYKER  
BRIGADE COMBAT TEAM (SBCT)

This is in response to your call for comments on the subject DEIS.

From Figure 8-9, it appears that the roadway corridor for the Stryker Brigade passes through our well field and reservoir facilities in Lalamilo, which is our sole water source for Kawaihae, Puakō, and the high-end resorts in South Kohala. Because of this, we have serious concerns as follows:

- L4-1 | 1. Although this roadway would be restricted to military use only, it does not ensure unauthorized use by the public or other undesirable elements. Specifically, with the heightened threat of worldwide terrorism, this raises serious vulnerability concerns for our facilities.
- L4-2 | 2. More importantly, with the anticipated vehicular traffic that may be transporting hazardous or petrochemical material along this roadway, there is a heightened potential for a spill that could seriously impair our groundwater aquifer.

L4-3 | In conclusion, with serious vulnerability and wellhead protection concerns, this Department hereby requests, if not requires, that the proposed road be relocated as far away as possible from our well fields and reservoirs. A more palatable alternative would be to upgrade and maintain the existing trail that is presently being used. This trail is far enough away that it would probably not raise vulnerability or water quality issues.

We appreciate the opportunity to comment on this DEIS and request you seriously consider our concerns. If you have any questions, please contact Mr. Glenn Ahuna, Engineering Division Head, at (808) 961-8070, extension 238.

Sincerely yours,

Milton D. Pavao, P.E.  
Manager

GGA:dms

... Water brings progress...

*Red 1/05/04 go*

DEC 2003	
DE	<i>DP</i>
DD	<i>RP</i>
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PPM	<i>W</i>
EC	

*-E Cury*

L4-1

The EIS has determined that there would be no significant impact from vandalism to other facilities by the implementation of the proposed action. If the Army decides to implement the proposed action, gates on the PTA trail will be coordinated with the property owner to prevent unauthorized use, reducing the risk of vandalism to other facilities in the area.

L4-2

The general issue of spills and spill mitigation was briefly discussed under impact 1b. There are numerous potential locations where spills could occur, now and under the project, and our focus was on the fact that there are regulations in place to protect the environment, and that by complying with those requirements, the Army's actions would be protective of the environment. We point out that the potential for spills and accidents cannot be entirely eliminated, but that the Army would respond to spills with trained personnel and using standard procedures that are already in place to address spills. In the particular case of the PTA trail, however, we have added additional text to point out that the project would heighten the potential for spills along this route, while reducing the potential for spills elsewhere.

L4-3

Based on public comment, the Army confirmed the locations of existing wellheads and aquifers in relation to the proposed Kawaihae to PTA military vehicle trail. Based on site investigations, there is no need to relocate the proposed alignment for this trail. In order to mitigate for any potential damage to the wellheads by vehicles breaking down and inadvertently going off the trail, the Army will construct protection devices around the well heads in consultation with the Water Company and land owners. In addition, the EIS analysis has shown that the potential for inadvertent spills from vehicles or vehicle accidents to impact the aquifers is less than significant. However, the Army has a Spill Prevention and Response Plan for all vehicles and vehicle travel. If the Army decides to acquire and construct these trails, this plan will be implemented for these areas as well. If the Army decides to implement the proposed action, the Army will coordinate with the property owners over the location of the proposed alignment. If the coordination results in a change in alignment which results in environmental impacts not analyzed in the EIS, the Army will conduct all appropriate NEPA, ESA and NHPA consultations prior to a final decision on a new alignment.

Comments

Responses

Letter Larry Kim  
L5 Mayor



County of Hawaii  
PLANNING DEPARTMENT

101 Pauahi Street, Suite 3 • Hilo, Hawaii 96720-3043  
(808) 961-8288 • Fax (808) 961-8742

Christopher J. Yuen  
Director

Roy R. Takemoto  
Deputy Director

January 23, 2004

Ms. Cindy Barger  
SBCT EIS Project Manager  
U.S. Army Corps of Engineers, Honolulu District  
Building 230, Room 306 CEPOH-PP-E  
Fort Shafter, Hawaii 96858-4812

Dear Ms. Barger:

**Subject:** Draft Environmental Impact Statement (DEIS) Comments  
**Project:** Army Transformation of the 2<sup>nd</sup> Brigade, 25<sup>th</sup> Infantry Division (I) to a Stryker Brigade Combat Team in Hawaii  
**Location:** Pohakuloa Training Area (PTA)  
Kaohe, Waikalua, Puuanahulu, Hamakua, South Kohala,  
North Kona, Island and County of Hawaii

This is in response to your request for comments, dated October 3, 2003, on the DEIS for the proposed project. The proposal includes the construction of new facilities, the renovation and/or replacement of existing facilities, land altering activities, and additional land acquisition at various locations on the islands of Oahu and Hawaii. Comments from this office shall be limited to the proposed uses and activities on the island of Hawaii and their environmental impacts on the County of Hawaii.

The PTA consists of several Tax Map Key (TMK) parcels and is situated in the State Land Use (SLU) Conservation district. As such, the existing PTA is not subject to any overlying zoning designations by Hawaii County. The proposed West PTA Acquisition Area (WPAA), containing between 15,000 and 23,000 acres of TMK parcel (3) 6-7-001:003 lies west (makai) of the adjacent PTA and is situated in the SLU Agricultural district. The WPAA is zoned Agricultural (A-40) by Hawaii County. The Land Use Pattern Allocation Guide (LUPAG) of County of Hawaii General Plan (GP) designates all of the lands situated within the existing PTA for Conservation. The LUPAG designation for the WPAA area is for Extensive Agriculture and Intensive Agriculture.

## Comments

## Responses

Ms. Cindy Barger  
SBCT EIS Project Manager  
U.S. Army Corps of Engineers, Honolulu District  
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January 23, 2004

### 1. Distribution List

The Distribution List provided in Chapter 13 of the DEIS is not organized so as to facilitate the identification of agencies, departments and organizations. It should be organized to list the notified affiliations and organizations alphabetically. Implementation of the project is likely to have a significant impact on the following agencies, departments, and organizations that are notably absent from the Distribution List.

- a) County of Hawaii, Department of Public Works (DPW)
- b) County of Hawaii, Department of Parks and Recreation (P&R)
- c) County of Hawaii, Department of Water Supply (DWS)
- d) County of Hawaii, Department of Environmental Management (DEM previously under DPW)
- e) County of Hawaii, Police Department
- f) County of Hawaii, Fire Department
- g) County of Hawaii, Department of Civil Defense
- h) University of Hawaii at Hilo, Institute for Astronomy

### 2. Land Use

- a) The discussion should provide support for the assertion (pg. 8-27) that "*general military training within the proposed acquisition area is not expected to affect off-post land use.*" The "*impact issues*" (Table 8-8 and pages 8-27 through 8-30) should include the following:
  - i. The potential impacts to off-post land use and possible future development in the areas proposed for a change in LUPAG designation that is situated to the north of Waikoloa Village and makai (west) of the proposed PTA Trail (Fig. 8-4).
  - ii. The potential impacts to off-post land use and possible future development in the areas proposed for a change of LUPAG designation by the proposed revision to the GP (Fig. 8-6).
- b) The discussion (pg. 8-27) regarding the conversion of the 23,000-acre WPAA from agricultural use to military training use is not adequate to support the conclusion that

### L5-1

The Distribution list is organized by type of recipient. There are headings for local, state, and federal agencies as well as private organizations and individuals. Within each group the recipients are listed alphabetically. These agencies have been added to our mailing list.

### L5-2

These types of impacts are too speculative to be addressed in the EIS, if they are only proposed. They will be mentioned in the cumulative section but a full analysis cannot be completed until these changes to the General Plan are complete.

### L5-3

The Army's evaluation considered conversion of farmland. The farmland conversion rating was completed and coordinated with DLNR and NRCS and was used in the Army's evaluation. The Farmland Conversion forms are included in Appendix E of the Final EIS.

## Comments

## Responses

Ms. Cindy Barger  
SBCT EIS Project Manager  
U.S. Army Corps of Engineers, Honolulu District  
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L5-3  
cont'd

the proposed change in land use would have a less than significant impact. The discussion does not address the significance and suitability of the subject pasturelands with respect to the total pasture or rangeland on the island.

- c) The discussion on the construction and use of the PTA Trail (pg. 8-28) requires clarification. *"PTA Trail construction would require approximately 132 acres (53 hectares) of land easements. The trail alignment is generally along undeveloped property boundaries, existing roads, and existing utility easements. Hence, trail construction and use is not expected to significantly affect land use. This would result in the land being more intensively used following the Proposed Action, with vehicle traffic between PTA and Kawaihae Harbor increasing in vehicle density from 40 to between 40 and 145 (an actual average increase of approximately 53 vehicles on the road at any given time)."*

L5-4

- i. The discussion should reconcile the stated conclusion that the construction and use of the PTA Trail is not expected to significantly affect surround land use with the statement (pg. 8-78) *"After the Proposed Action is implemented, users of those plantation roads would use other roads to access their agricultural lands.*
- ii. Explain what is meant by an actual average increase of 53 vehicles on the road at any given time. The discussion does not make clear how often an average of 53 vehicles will be on the road between PTA and Kawaihae Harbor.

L5-5

- d) The discussion (pg. 8-28) on the use of the Integrated Training Area Management (ITAM) program to identify and mitigate potential impacts on the land and coordination between the Army and the National Resources Conservation Service (NRCS) in light of the objectives and guidelines of the Farmland Protection Policy Act (FPPA) does not adequately explain how ITAM will identify and mitigate potential impacts. Neither does the discussion demonstrate how coordination between the Army and the NRCS in light of the objectives and guidelines of the FPPA further identify and mitigate potential impacts.

L5-6

- e) The discussion does not support the proposed establishment of *"a cooperative relationship with the landowner to allow continued grazing at WPAA in conjunction with training on the land, subject to constraints posed by training"* (pg. 8-28) as a mitigative measure for the conversion of agricultural lands to military training lands.
- i. How is grazing on WPAA lands during periods when no training maneuvers are underway consistent with the proposed mitigation (pg. 8-52) of substantial adverse impact on air quality by re-vegetation of disturbed areas?

L5-4

The Army would consult with local land owners to provide for joint use of plantation roads after construction of the PTA Trail. According to Table 2-7, only four SBCT exercises per year would take place requiring the PTA Trail, the same as the current forces.

L5-5

The farmland conversion rating forms are included in Appendix E of the Final EIS.

L5-6

It is possible that cattle grazing would continue on the WPAA. If the Army decided to implement the proposed action, the Army would weigh the potential of continued cattle grazing on the proposed West PTA acquisition area based on the potential benefits to fire reduction, potential interference with ongoing Army training, and requests of local cattle ranchers. If the Army decided that cattle grazing were appropriate, cattle would be managed so as to avoid any overgrazing and any resulting significant soil erosion. In accordance with Army Regulations 350-4, the mandate of the ITAM program is to manage land for Army training and repair damage incurred by Army training. As part of this mandate, this would also include any related actions such as managing land for grazing or repairing damage caused by the cattle. Continued use of the WPAA for agricultural purposes, consistent with Army use, would result in a less than significant impact on the community.

## Comments

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Ms. Cindy Barger  
SBCT EIS Project Manager  
U.S. Army Corps of Engineers, Honolulu District  
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L5-6  
cont'd

- ii. What amount of suitable pasturage would be available for grazing during a given period of training inactivity?
- iii. How many non-training periods per year would the WPAA lands be available for grazing periods of sufficient duration to be economically viable to any local ranching interest?

### 3. Visual Resources

L5-7

- a) The EIS states (pg. 8-32) that the "*General Plan of Hawai'i designates no sensitive views at or near PTA (County of Hawai'i 1989).*" However, the GP lists the following locations as examples of natural beauty:
  - i. The scenic countryside around Waikii (TMK 6-7-01:003).
  - ii. The mauka & makai view plane from various locations along Queen Kaahumanu Hwy. in South Kohala and North Kona.
  - iii. The Mauna Kea State Park area (TMK 4-4-16:003).

L5-8

- b) The methodology employed to determine potential impacts on visual resources fails to consider impacts resulting from fugitive dust. It does not consider the potential degradation of view planes resulting from the estimated 2,039 tons per year of additional fugitive dust suspended in the atmosphere (pg. 8-50 & 8-53) as a result of training exercises and wind erosion of WPAA lands and the extended use of PTA facilities.

L5-9

- c) The impacts on visual resources resulting from fugitive dust emissions generated from the use of helicopters and other aircraft that may be used in concert with training maneuvers in the WPAA should be discussed.

L5-10

- d) The discussion regarding increased artificial light pollution (pg. 8-41) resulting from the new facilities and increased training activities is inadequate and should include the following:
  - i. Current artificial light levels and the increased light levels anticipated from the proposed project in comparison to artificial light levels acceptable to observatory operations on Mauna Kea.
  - ii. Documentation to support the assertion that ongoing night training use of flares and light emitting munitions and explosives is not detrimental to observatory operations.

L5-7

Text has been revised. Please see Section 8.3 - Visual Resources.

L5-8

As discussed in Sections 4.5, 5.5, 6.5, 7.5, and 8.5, the Army is developing mitigation techniques in consultation with the USEPA to reduce fugitive dust emissions to a less than significant level. This would negate any visual impacts from fugitive dust.

L5-9

As discussed in Sections 4.5, 5.5, 6.5, 7.5, and 8.5, the Army is developing mitigation techniques in consultation with the USEPA to reduce fugitive dust emissions to a less than significant level. This would negate any visual impacts from fugitive dust.

L5-10

Under the Proposed Action, non-training lighting, such as for the ammunition storage area and cantonment, would use low sodium vapor lighting and would mostly be used during the day. It would also be properly oriented and shielded to illuminate specified areas. The use of nighttime lighting devices, such as flares, during training would increase. The use of these devices is not expected to increase dramatically because training with night vision goggles would be conducted in training areas. The increased use of lighting devices for training would mostly be in the WPAA and not in Army areas closest to, for example, nearby observatories, which require dark surroundings during nighttime operations. The Army has not received complaints regarding nighttime light and glare from nearby observatories. Visual impacts would be less than significant with respect to altering nighttime light and glare.

L5-11

Projected training schedules for PTA indicate that the limited frequency of use that the PTA Trail would receive, and the low level of traffic on Saddle Road (currently approximately 400 vpd) would result in no significant impacts on visual resources by the military traffic on PTA Trail. See Chapter 8.3 for an analysis of traffic and dust on visual resources.

**Comments**

Ms. Cindy Barger  
 SBCT EIS Project Manager  
 U.S. Army Corps of Engineers, Honolulu District  
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 January 23, 2004

**L5-10  
 cont'd**

iii. A realistic evaluation on the likelihood that nighttime training exercises will be conducted during periods of full moon in order to minimize the impact of an increase in the overall light pollution from additional night training.

**L5-11**

e) A discussion should be included on the potential adverse impacts to view planes resulting from the use of the PTA Trail and WPAA that would affect the proposed realignment corridors for Saddle Road and the Waimea-Kawaihae Road. Such impacts should include the potential mauka and makai views from the current and/or realigned corridors resulting from the significant increase in airborne fugitive dust from vehicular convoys, training maneuvers, and wind erosion.

**L5-12**

f) Overall cumulative impacts are stated as less than significant *"because the proposed project and the cumulative projects listed above (Table 9-1, pages 9-3 through 9-5) would be spread out over a large area and would not be confined to one region in particular."* This seems to be saying that the adverse visual impacts are not significant because they are spread out over a greater area of Oahu and Hawaii. However, the greater the area adversely impacted actually increases the significance of the impact.

**4. Air Quality**

**L5-13**

a) No effective measures are proposed for mitigation of the significant adverse impact on the air quality, and resulting health hazards, due to the increase in fugitive PM<sub>10</sub> (inhalable particulate matter) emissions resulting from the increased off-road vehicular maneuvers and wind erosion in the PTA and WPAA (pg. 8-51).

**L5-14**

b) The discussion on air quality impacts either dismisses or ignores the impacts from the additional PM<sub>10</sub> emissions resulting from increased ordnance firing and vehicular convoys on the PTA Trail. The cumulative impacts (pg. 8-51) should consider the fugitive dust from these activities since they would typically be conducted immediately prior to, during, and after other training activities and the typically ever-present wind erosion processes.

**L5-15**

c) The impacts on air quality resulting from fugitive dust emissions created by the use of helicopters and other aircraft that may be used in concert with training maneuvers in the WPAA should be discussed.

**L5-16**

d) The basis for emissions from wildfires (80 acres being burned per year) may be faulty if the potential causes of wildfires include only tracers, flares, and pyrotechnics (pg. 8-56). This discussion should substantiate the assumption of 80 acres being burned per year in calculating the estimated emissions resulting from wildfires.

**Responses**

**L5-12**

Normally, the larger the ROI, the less likely that an impact is cumulatively significant. For example, conversion of 20 hectares of land from agricultural to military use could be significant if the ROI is only the northwest corner of SBMR. However, if the ROI is the island of O'ahu, that same land conversion would probably not be significant due to the fact that the impact is a small percentage of the total land of O'ahu.

**L5-13**

As noted in the Final EIS, the Army has committed to mitigating dust from vehicle traffic on unpaved roads through a combination of dust control chemical applications and the use of washed gravel for surfacing military vehicle trails. In addition, the Army would implement a Dust and Soils Management and Monitoring Plan that would include ambient air quality monitoring of PM10 conditions. The monitoring of ambient PM10 concentrations would help guide the development and implementation of an adaptive management program to manage training area lands and modify training procedures as necessary to ensure compliance with federal air quality standards.

**L5-14**

The DEIS estimates PM10 emissions from all vehicle travel activities, including convoy traffic on military vehicle trails. Emission quantities produced by ordnance firing are too small to have measurable impacts away from the actual firing location or detonation location.

**L5-15**

Low level helicopter and aircraft flights are not a significant source of fugitive dust. Helicopter landings on unpaved and unvegetated areas can be a brief and very localized source of fugitive dust, but would not be a significant contributor to overall fugitive dust generation at Army facilities in Hawai'i. Since the Proposed Action would not have a significant effect on overall flight operations by the Aviation Brigade, there would be little or no net increase in fugitive dust emissions associated with helicopter operations. The DEIS analyses focused on those activities most likely to change and most likely to contribute large quantities of fugitive dust under the Proposed Action.

## Comments

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Ms. Cindy Barger  
SBCT EIS Project Manager  
U.S. Army Corps of Engineers, Honolulu District  
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L5-17

- e) A discussion should be included on the potential adverse impacts, if any, on the observatory operations on Mauna Kea, Mauna Loa, and Haleakala resulting from the significant increase in the volume of fugitive dust that will be suspended in the atmosphere.
- f) Potential mitigation of fugitive dust resulting from off-road military vehicle use and wind erosion of devegetated areas includes the use of gravel, paving, spraying of water, the application of dust control treatments to unpaved roads, and rotating and reseeded on maneuver areas (pages 8-52 & 8-53). Issues not discussed with respect to these proposed measures include:

L5-18

- i. The quantities of synthetic dust control chemicals that would be required for effective dust control and the environmental impacts resulting from their use.
- ii. The amount of water that is anticipated for use in dust control measures and the impact on the water supply.
- iii. Reconciliation of germination time required for reseeded of maneuver training areas between repeated training events and the proposed use of WPAA lands for grazing and recreational hunting during the relatively infrequent gaps in training operations.

### 5. Noise

L5-19

- a) The noise buffers (pg. 8-70) around Waikii Ranch and Kilohana Girl Scout Camp (KGSC) being proposed as a mitigative measure for the significant impact resulting from increased training activities (40-60 events annually with some lasting more than one day) in WPAA and/or artillery firing in training areas 15 and 16 (see Fig. 8-2) are not adequately supported by the discussion.

L5-20

- b) The discussion does not mention the possible use of helicopters in connection with training maneuvers in WPAA and potential noise impacts on Waikii Ranch and KGSC.

L5-21

- c) The discussion should identify the nearest occupied dwellings to the PTA firing points, PTA Trail and WPAA that will be most impacted by noise associated with the proposed vehicular convoys and military training exercises.

L5-22

- d) The discussion on noise levels (pg. 8-70 and Fig. 8-17) does not account for the topographical variations between potential noise pollution sources on the PTA Trail, WPAA and PTA and impacted surrounding properties. In particular the discussion should address the difference in the distance sound travels from a low elevation to a

L5-16

The evaluation of emissions from wildfires was based on historical records for the number and size of wildfires at different installations.

L5-17

Given the elevation differences between PTA and the Mauna Kea observatories and the feasibility of controlling fugitive dust from vehicle travel on unpaved roads, no significant impact on observatory operations is expected. Predominant wind directions are downslope, away from the observatories. A discussion of impacts on the observatories has been added to Section 8.3 - Visual.

L5-18

The discussion of dust control chemicals has been expanded in the Final EIS. The frequency and quantity of dust control chemical applications would be determined by actual experience and monitoring changes in dust generation in response to changing weather conditions. As noted in the expanded discussion in Section 5.5 of the Final EIS, the recommended dust control chemicals could be mixed with either fresh water or sea water. Where alternative water sources are available, potable water supplies would not have to be used. The feasibility of any revegetation program would be determined in the context of the Army's established NRMP and ITAM programs. It is unlikely that any revegetation programs could be implemented for dust control purposes at SBER or KTA. Until actual use patterns at WPAA are assessed, it is premature to speculate on the feasibility or effectiveness of revegetation programs for that area. Management programs to control dust from off-road maneuver areas at SBER and KTA are likely to focus on scheduling of maneuver activities for periods when there is adequate surface moisture to control dust generation. Management programs to control dust from the WPAA are likely to focus on dispersing vehicle activity over a large enough area to avoid significant damage to vegetation cover.

L5-19

The Final EIS has a revised discussion of noise impacts from training activities in WPAA, and recommends somewhat larger buffer zones than discussed in the DEIS. Final decisions on noise buffer zone issues may be made as part of the ENMP.

**Comments**

Ms. Cindy Barger  
 SBCT EIS Project Manager  
 U.S. Army Corps of Engineers, Honolulu District  
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 January 23, 2004

- L5-22 cont'd** | higher elevation as compared to across the same elevation or from a higher to lower elevation.
- L5-23** | e) A proposed noise mitigation measure (pg. 8-65) includes improved notification of surrounding communities of scheduled training exercises, which would thereby reduce the number of complaints. This does not mitigate the adverse impact of the noise pollution being created, but may only reduce the number of complaint calls.
- L5-24** | f) The first sentence of the first paragraph on page 8-65 does not make any sense.
- 6. Traffic**
- L5-25** | a) Under the proposed action (pg. 8-78), *"troops will be transported from Kawaihae Harbor to PTA by Strykers or trucks up to one brigade level plus support vehicles. There would be up to 10 trucks and 24 Strykers per trip."* This statement indicates a maximum convoy size of 34 vehicles. However, the level-of-service (LOS) analysis (pages 8-78 & 8-79) identifies a maximum number of vehicles per convoy at twenty four vehicles.
- L5-26** | b) The discussion (pg. 8-79) does not include reference to the effect that operation of the military vehicle trail crossing may have on the proposed Waimea-Kawaihae Road to the south of the existing Kawaihae Road.
- L5-27** | c) Potential traffic impacts resulting from the PTA Trail intersection with the proposed W-3 realignment of the Saddle Road should be discussed and assessed.
- L5-28** | d) Potential traffic impacts resulting from the PTA Trail intersection with the proposed realignment of the Waimea-Kawaihae Road (DOT Proj. No. 19D-01-79) should be discussed and assessed.
- 7. Water Resources**
- L5-29** | a) The discussion on the quality of surface and ground water in the PTA and WPAA concludes that no significant effect is expected from the increased amount of explosives residue in soils due to the lack of perennial streams and surface water bodies in the project area and due to the depth of the groundwater (pg. 8-89). Additional discussion should include:
  - i. The potential for explosive residue build up in the soil over long dry periods that may be carried to the near shore waters by seasonal heavy rains?

**Responses**

Artillery firing points are far enough from Waiki'i Ranch and Kilohana Girl Scout camp so that noise buffer zones are not a relevant mitigation measure. The noise contours presented in Figure 8-14 account for firing activity patterns at all artillery firing points.

**L5-20**

Noise impact discussions regarding training activities at WPAA have been expanded in the Final EIS to include current estimates of helicopter flight activity at WPAA as well as additional information on small arms firing noise. As noted in the DEIS and the revised discussion in the Final EIS, potentially significant noise impacts from such training activities can be mitigated to a less than significant level. The Army acknowledges that local residents may not agree with the criteria the Army uses to determine acceptable noise levels.

**L5-21**

Topography is accounted for in the modeling of noise from heavy weapons use. The modeling of noise from vehicle operations deals with distances that are too short to have significant terrain effects unless there are abrupt terrain features that act as noise barriers. Terrain features have little effect on noise propagation from in-flight aircraft unless the flight path is below the elevation of a terrain feature that acts as a noise barrier. In general, ground absorption of noise is increased and noise levels are reduced when the noise propagates up slope from lower elevations. Terrain features that block line of sight to the noise source act as partial barriers to noise propagation. When line of sight is not blocked, ground absorption of noise is reduced when the noise propagates down slope from a source at a higher elevation. Figure 2-6 in the DEIS shows the location of vehicle maneuver areas, the PTA Trail alignment, and artillery firing point locations at PTA. Figure 8-2 also shows the locations of artillery firing points and the upper section of the PTA Trail. Artillery firing points at PTA are located at distances of 3 to 14 miles from the Waiki'i Ranch boundary, with most firing points more than 6 miles from the closest part of Waiki'i Ranch. The closest point on the PTA Trail to Waiki'i Ranch is about 1.25 miles from the southeast corner of the Ranch boundary.

**L5-22**

The munitions noise modeling accounts for topographical features and their affects on noise. The resulting contours found in the EIS reflect this. The noise analysis for the vehicle trail and WPAA training use a straight line analysis from the point of origin for the noise source. Any differences due to purely elevation are considered insignificant for modeling. They would result

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- L5-30 | ii. The possible petrochemical pollution of water resources resulting from the accumulation of spilled and leaked materials from vehicles engaged in the much-increased vehicular activity on PTA Trail, WPAA and PTA.
8. **Human Health and Safety Hazards**
- L5-31 | a) The discussion should identify specific measures and assurances that the significant impact resulting from elevated levels of munitions byproduct contamination, such as lead and RDX (cyclotrimethylenetrinitramine) (pages 4-77 & 4-78) will be mitigated when and if any range is closed and transferred out of DoD control. In view of the military's poor track record in cleaning up air, soil & water contamination resulting from use of munitions and cleaning up of unexploded ordnance, and the dangers these types of contamination present to the environment and citizenry, such discussion is considered critical by the County of Hawaii.
- L5-32 | b) Additional live-fire ranges and the increased transport of hazardous and combustible materials over the PTA Trail presents a significant wildfire risk (pg. 8-192). An expanded discussion should also include potential for additional risk possible mitigation for wildfires resulting from increased mounted and unmounted maneuvers in PTA and WPAA.
9. **Public Services and Utilities**
- L5-33 | a) Adverse impacts affecting police, fire and emergency medical services are listed as less than significant (pg. 8-213) without any apparent justification.
- L5-34 | b) The additional long-term demand on City of Hilo (*sic*) potable water resources is identified as less than significant without justification (pg.8-210).
- L5-35 | c) The discussion on potable water consumption (pg. 8-210) indicates that water consumption on PTA ranges from 10,000 gallons per day to 250,000 gallons per day, depending on camp occupancy, and that average consumption is 100,000 gallons per day. In view of the discontinuation of the use of spring water (pg. 8-210) as a source of potable water at PTA all potable water must now be trucked in to supply the two 670,000 gallon storage reservoirs and the three 10,000 gallon distribution reservoirs. Based on these capacities, the camp occupancy could operate at full capacity for less than six days without compromising fire reserves before the number of 5,000-gallon truck deliveries of water would have to be tripled.
- L5-36 | d) A discussion should be included on the impacts on public roadways resulting from use of up to 14 trucks (pg. 8-210) daily to transport potable water from Waimea to PTA.

## Responses

in no discernable difference. The discussion in Section 8.6 - Noise does describe impacts on the nearest noise receptors, including dwellings and public areas, such as the Girl Scout camp.

### L5-23

This fact is noted in the DEIS. But as is clear from several public comments received on the DEIS, there is a concern about inadequate information and inadequate complaint handling procedures.

### L5-24

Text has been corrected to add missing word at end of sentence; corrected text reads:

"... both of which share fence boundaries with the WPAA."

### L5-25

The maximum convoy size would be 24 vehicles, including up to 10 trucks or 24 Strykers.

### L5-26

The proposed Waimea-Kawaihae Road project is discussed in Chapter 9 - Cumulative Impacts. At the present time there are no plans for completion of this project or funds allocated. If the Army decides to implement the proposed action, the Army would coordinate with FHA to have crossing go under the road if practicable versus across grade, thereby minimizing any impact to traffic along the new road.

### L5-27

The new Saddle Road alignment is proposed through the southern portion of the West PTA Acquisition Area. The U.S. Department of Transportation, Federal Highway Administration (FHA), could not provide a firm construction date at this time for this section of the new Saddle Road. If the Army decides to implement the proposed action, the Army will coordinate all road crossings with the FHA to minimize impacts to traffic along the new Saddle Road. Phase III of the Saddle Road realignment (which is from PTA West) has not yet been designed. Upon a favorable Record of Decision (ROD), the Army would purchase the Keamuku and own the land bordering both sides of this section to Saddle Road. The Army would request that the road design be

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- L5-37 e) The discussion should include the potential impacts on the County of Hawaii water supply system resulting from the proposed addition of a new water line from the existing water main on Kawaihae Road to the tactical vehicle wash site (pg. 8-213).
  - L5-38 f) A discussion on the potential impacts on traffic resulting from the construction of a new water line from Kawaihae Road to the tactical vehicle wash site should be included (pg. 8-213).
  - L5-39 g) The discussion (pg. 8-214) on "minor long-term adverse effects" from the proposed action with regards to solid waste management should identify what landfill will realize a reduced useful life. The discussion does not specify the "minimal increase in solid waste" expected as a result of increases in training and does not identify the capacities of the existing waste collection and disposal systems stated to be adequate.
- 10. Cumulative Impacts**
- L5-40 a) Although less one mile from Kilohana GS Camp and within three miles of Waikii Ranch Subdivision, no discussion (pg. 9-16) is provided regarding the 1010 Land Acquisition Area (1010 LAA), consisting of 990 to 1,010 acres, to establish that *"the land to be acquired has no significant impact on the local community."* Furthermore, the proposed uses and activities in the 1010 LAA are not discussed in this DEIS and no reference is provided for the EIS in connection with this proposed land acquisition.
  - L5-41 b) The proposed new Waimea-Kawaihae Road (DOT Proj. No. 19D-01-79) project (Fig. 8-4) is not included in the discussion on Cumulative Impacts or is incorrectly identified on Figure 9-2.
  - L5-42 c) The repeated reference to consideration by the Army to establish a cooperative relationship with the landowner to allow continued grazing at WPAA in conjunction with training as a mitigative measure to further reduce the cumulative impacts of having agricultural lands converted to military training (pg. 9-21) requires reconciliation with the suggested training schedules, proposed re-vegetation efforts, proposed recreational hunting mitigative measures, and the questionable suitability of WPAA lands between training periods for grazing purposes.
  - L5-43 d) *"Overall, cumulative impacts would be less than significant because the proposed project and the cumulative projects listed above would be spread out over a large area and would not be confined to one region in particular. Consequently, any impacts on visual resources are more likely to be localized."* (pg. 9-23) On the contrary, the significance of the cumulative impacts is increased by their effect on a wider area of the State and the County of Hawaii in particular.

**Responses**

conducive to training needs ,which would include a possible road crossing with traffic control devices and an appropriate number of troop underpasses (which has not been determined yet). Proper use of these two means of crossing the public road would not seriously hamper military training, as many realistic scenarios found in real world situations involve consideration of public roadways.

**L5-28**  
 Please refer to Chapter 9, Cumulative Impacts for a discussion on the Saddle Road Realignment Project. Also see Section 8.7 for traffic impacts.

**L5-29**  
 These impacts are unlikely due to the distance from the ocean, and the low concentrations of residues in the soils.

**L5-30**  
 Small spills of diesel fuel are unlikely to result in impacts on water resources. Compared to the impacts from spills and leaks from vehicles that occur frequently on streets in urban areas, and involve gasoline constituents, small spills of diesel fuel from large Army vehicles that are regularly maintained are not likely to significantly impact water resources. Diesel fuel is relatively immobile in soils and is rapidly biodegraded by organisms that occur naturally in soils. Large spills that occur due to ruptures in hydraulic lines or tanks, etc., will be cleaned up using standard remediation methods.

**L5-31**  
 The Army retains responsibility under CERCLA/SARA for cleanup of past contamination. However, the ranges and other areas that are the subject of this EIS are not scheduled for closure and therefore the impacts of closure are not addressed in the EIS. Impacts of closure actions would be subject to evaluation under NEPA if and when they occur in the future.

**L5-32**  
 Actually once the land is acquired WPAA the WFMP for PTA will be modified to included plans to reduce the potential for wildfires in the area included those from the trail. And we did evaluate the potential for a slight increase in wildfires and their impacts on Bio, Haz waste, Water Resources, and Geo sections for PTA.

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L5-43  
cont'd

It should also be noted that the impacts on visual resources discussed does not include those visual impacts resulting from airborne dust created by mounted training maneuvers, additional live-fire training, unpaved road construction and maintenance, aircraft operations in support of training maneuvers, and wind erosion of devegetated land areas.

L5-44

e) The stated unlikelihood that PTA Trail and Saddle Road (realigned) construction activities would result in a cumulatively significant impact on visual resources partly because of the separation (pg. 9-24) is not consistent with the W-3 preferred alignment of Saddle Road and the PTA Trail through the WPAA (see Fig. 9-2).

L5-45

f) The discussion on cumulative impacts to air quality (pg. 9-26 & 9-27) does not include any reference to the potential impacts resulting from the increased ozone precursor emissions and PM<sub>10</sub> emissions when combined with the ongoing volcanic gas emissions from Kilauea or likely further volcanic events.

L5-46

g) The discussion (pg. 9-29 & 30) regarding the potential conflicts with right-of-way acquisitions needed for the Saddle Road realignment resulting from the expanded use of PTA combined with other local land acquisition and development projects talks about two impacts the Saddle Road project will have on the Proposed Action.

L5-47

i) The first impact relates to the anticipated increase in traffic on Saddle Road "*will have no impact on the proposed military trail element of the project because the trail would not cross Saddle Road.*" Additional discussion is required to reconcile this statement with the proposed alignment of the military trail and the preferred W-3 realignment for Saddle Road within the WPAA (see Fig 9-2), which clearly shows these two alignments having at least one intersection.

L5-48

ii) The second impact relates to the impact of right-of-way acquisition on the expansion of PTA. The discussion states that: "*While the road project may affect PTA expansion, SBCT project actions at PTA would not contribute to right-of-way impacts on Saddle Road.*" Additional discussion should explain how the acquisition and use of the WPAA lands would not impact the right-of-way acquisition of the W-3 alignment of Saddle road.

iii) The preferred W-3 alignment for Saddle Road is located in the middle of the proposed WPAA 23,000-acre parcel. This DEIS fails to provide an adequate analysis or discussion on the potential impacts of the proposed project on the preferred W-3 realignment. Such discussion on the W-3 alignment should include, but not be limited to:

L5-33

Section 4.14.1 provides the factors considered for determining significant impacts to public services, which is an increase in demand beyond the capacity of the utility provider. Section 8.14.2 determines that there are less than significant impacts on the provision of public services because existing fire, police, and emergency services would be capable of handling any increase in training activities at PTA.

L5-34

Section 8.14.2 incorrectly identifies the tactical vehicle wash as requiring 13.5 million gallons of water/year. The vehicle wash would recycle used water, and would require only 500,000 gallons/year. The total requirement after the addition of the vehicle wash would be approximately 8,500 gallons per day, which is well within the range of water currently supplied by trucking in from Waimea.

L5-35

Public and firefighter safety is the first priority in every fire management activity. The Army will fully implement The Integrated Wildland Fire Management Plan (IWFMP) for Pohakoloa and O'ahu Training Areas as updated on October 2003. The Army will manage water resources at PTA to ensure that there is adequate water for troops training at PTA as well as appropriate fire response measures in accordance with the IWFMP. The plan is available upon request.

L5-36

The number of military vehicles using PTA Trail would be minimal. The maximum number of vehicles per convoy would be 24, and convoys would be sequenced at 15- to 30-minute intervals, so the maximum hourly volume would be 96 vehicles per hour. Convoys would be scheduled during non-peak traffic hours, thus reducing potential impacts on peak-hour traffic conditions. No mitigation would be required. Because military vehicles would use PTA Trail, there would be fewer military vehicles on public roadways that could adversely affect roadway segment operations. With the increase in the number of water trucks, the potential impact would still be less than significant.

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L5-48  
cont'd

- (1) Any economic impacts resulting from the possible need to reassess the completed studies and adopted realignment;
- (2) Possible impacts on visual resources, including mauka and makai view planes from the W-3 alignment;
- (3) Potential impacts from noise and dust resulting from maneuver activities in close proximity to a major public highway; and
- (4) Any impacts on traffic resulting from training maneuvers near or within sight of the W-3 alignment.

L5-49

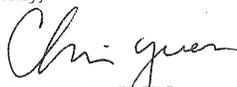
- h) The potential increases in unexploded ordnance (UXO) from increased live-fire training activities on PTA combined with existing UXO on PTA, Waikoloa Maneuver Area, Nansay Sites and Pu'u Pa Maneuver Area presents a significant impact. (Pg. 9-46 & 9-47) Proper abatement and removal techniques under EPA and USARHAW guidelines are offered as mitigative measures, but their implementation is neither proposed or has historically been satisfactorily carried out.

L5-50

- i) The cumulative impacts from training in the WPAA (pg. 9-47) are considered less than significant because the area has been leased in the past to conduct training maneuvers without any discussion on the frequency or size of previous training events in the WPAA lands.

Should you have questions, please feel welcome to contact Larry Brown or Esther Imamura of my staff at 961-8288.

Sincerely,



CHRISTOPHER J. YUEN  
Planning Director

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## Responses

### L5-37

The tactical vehicle wash would require the use of only approximately 500,000 gallons per year. The total requirement after the addition of the vehicle wash would be approximately 8,500 gallons per day, an amount insufficient to create a significant adverse impact on the County of Hawai'i water supply system.

### L5-38

As noted in Section 8.7.2 and Table 8-15, the construction associated with the Proposed Action, which includes construction of a new water line, would generate additional traffic from worker vehicles and trucks. The construction traffic would be temporary and less than significant. To minimize traffic impacts to the surrounding community during construction, a construction traffic management program would be implemented. The program would stagger work hours to reduce impacts from construction workers during peak hours, would identify truck routes to limit truck traffic to major streets, and would designate parking for construction workers. No mitigation would be required.

### L5-39

The EIS has determined that there would be no significant impacts to solid waste management from the implementation of the proposed action. PTA disposes of its solid waste through a solid waste management service that delivers the waste to County landfills and disposal areas. The County regulates the landfills and disposal areas to ensure that there is adequate capacity for all those that it services.

### L5-40

Chapter 9 does include a discussion of the 1010 land acquisition project (project # 3) as well as the other land acquisitions proposed as part of SBCT. Figure 9-3 also identifies the location of the land acquisition projects, including the 1010 project, near PTA. The 1010 Land Acquisition Area would be used in the same manner as the WPAA. Since the 1010 Acquisition Area is further from Kilohana Girl Scout Camp and Waiki'i Ranch than is the WPAA, use of the 1010 Acquisition Area would have less impact than use of the WPAA. The discussion of impacts related to the WPAA adequately addresses impacts of use of the 1010 Acquisition Area.

## Comments

## Responses

### L5-41

Chapter 9, Table 9-2 (project #6) identifies project and the section discusses the possibility of work on the Waimea-Kawaihae Road. However, there are no proposals at this time that could assist in impact analysis.

### L5-42

The WPAA acquisition is part of the project description. Impacts caused by this project component are discussed under the appropriate resource categories in Chapter 8. Comment issues could be addressed in prepared land management planning documents for WPAA.

### L5-43

Normally, the larger the ROI, the less likely that an impact is cumulatively significant. For example, conversion of 20 hectares of land from agricultural to military use could be significant if the ROI is only the northwest corner of SBMR. However, if the ROI is the island of O'ahu, that same land conversion would probably not be significant due to the fact that the impact is a small percentage of the total land of O'ahu. Dust impacts on visual resources are discussed in the respective direct impact sections. For instance, such impacts are discussed in Section 5.3.4 under less than significant impacts to Proposed Action.

### L5-44

The new Saddle Road alignment is proposed through the southwestern portion of the West PTA Acquisition Area. The U.S. Department of Transportation, Federal Highway Administration (FHWA), confirmed that there are no scheduled funds and no scheduled construction date at this time for this section of the new Saddle Road. If the Army decides to implement the proposed action, the Army would coordinate with FHWA to reduce the number of crossings of the new Saddle Road and where practicable have crossing go under the road versus across grade, thereby minimizing any impact to traffic along the new Saddle Road. If the Army decides to implement the proposed action, the Army would coordinate with FHWA to limit training activities likely to disturb traffic in proximity to Saddle Road during high traffic periods. WPAA acquisition is part of the project description and impacts caused by this project component are discussed under the appropriate resource categories in Chapter 8.

## Comments

## Responses

### L5-45

Volcanic gas emissions are not ozone precursors. The dominant emissions are acidic compounds or their precursors (sulfur dioxide, hydrogen sulfide, hydrogen chloride, hydrogen fluoride, etc.). Other major components of volcanic gas emissions include water vapor, carbon dioxide, carbon monoxide, and hydrogen gas. The atmospheric chemistry of these compounds would result in ozone scavenging and a competing atmospheric reaction process that would generate acid deposition products rather than ozone and photochemical smog products. Volcanic eruptions are also a source of PM10 emissions, including volcanic ash and condensed metals vaporized from magma and lava. High concentrations of PM10 emissions are produced by explosive eruptions. Explosive eruptions of Hawai'ian volcanoes are infrequent, with the last significant explosive eruption being the 1790 eruption of Kilauea. Historical PM10 monitoring data from Hawai'i Island (at Captain Cook, Hilo, and Honoka'a) do not show any PM10 levels close to the values of the federal and state PM10 standards (see Table 2 in Appendix G1). The proposed action will not contribute gases similar to those emitting from Kilauea volcano. Refer to Chapter 2, Section 2.3

### L5-46

The new Saddle Road alignment is proposed through the southwestern portion of the West PTA Acquisition Area. The U.S. Department of Transportation, Federal Highway Administration (FHWA), confirmed that there are no scheduled funds and no scheduled construction date at this time for this section of the new Saddle Road. If the Army decides to implement the proposed action, the Army would coordinate with FHWA to reduce the number of crossings of the new Saddle Road and where practicable have crossing go under the road versus across grade, thereby minimizing any impact to traffic along the new Saddle Road. If the Army decides to implement the proposed action, the Army would coordinate with FHWA to limit training activities likely to disturb traffic in proximity to Saddle Road during high traffic periods. WPAA acquisition is part of the project description and impacts caused by this project component are discussed under the appropriate resource categories in Chapter 8.

**Comments****Responses****L5-47**

The new Saddle Road alignment is proposed through the southern portion of the West PTA Acquisition Area. The U.S. Department of Transportation, Federal Highway Administration (FHA), could not provide a firm construction date at this time for this section of the new Saddle Road. If the Army decides to implement the proposed action, the Army will coordinate all road crossings with the FHA to minimize impacts to traffic along the new Saddle Road. Actions taken to minimize impacts may include separate grade crossings. However, any impacts caused by the WPAA activities would be more than offset by the reduction in military convoy traffic on Saddle Road afforded by the construction of the PTA trail.

**L5-48**

The new Saddle Road alignment is proposed through the southwestern portion of the West PTA Acquisition Area. The U.S. Department of Transportation, Federal Highway Administration (FHA), confirmed that there are no scheduled funds and no scheduled construction date at this time for this section of the new Saddle Road. If the Army decides to implement the proposed action, the Army would coordinate with FHA to reduce the number of crossings of the new Saddle Road and where practicable have crossing go under the road versus across grade, thereby minimizing any impact to traffic along the new Saddle Road. If the Army decides to implement the proposed action, the Army would coordinate with FHA to limit training activities likely to disturb traffic in proximity to Saddle Road during high traffic periods. WPAA acquisition is part of the project description and impacts caused by this project component are discussed under the appropriate resource categories in Chapter 8.

**L5-49**

As discussed in Section 8.12, if the Army decides to implement the proposed action the following mitigation measure would be implemented. Prior to initiation of any construction activities, USARHAW will employ qualified professionals to perform UXO clearance of the proposed construction area, remove all UXO encountered to ensure the safety of the site, and document UXO surveys and removal actions in full accordance with applicable laws, regulations, and guidance. In addition, if the Army chooses to relinquish ownership of the land as a result of a Base Realignment and Closer (BRAC), the Army will clean up unexploded ordnance left on the lands in accordance with all applicable laws and regulations, including but not limited to the implementation of the Formerly Used Defense Site (FUDS) program.

**Responses**

**L5-50**

As noted in the Draft EIS (Chapter 8, page 8-19), the WPAA has in the past been used four or five times a year for maneuver training exercises. The Draft EIS (page 8-28) notes that the Proposed Action and RLA Alternative would result in the WPAA being used 40 to 60 times per year, with some use events lasting more than one day. The direct impacts of training in WPAA are discussed in Chapter 8. Chapter 9 considers the combination of these direct effects with other actions proposed by the Army and other entities.

**Comments**

### Comments

Letter  
L6

JEREMY HARRIS  
MAYOR

OUR REFERENCE CS-KP

POLICE DEPARTMENT

CITY AND COUNTY OF HONOLULU

801 SOUTH BERETANIA STREET  
HONOLULU, HAWAII 96813 - AREA CODE (808) 529-3111  
<http://www.honolulu.org>  
[www.co.honolulu.hi.us](http://www.co.honolulu.hi.us)



*Received 17 01/04*  
*ALO*

LEE D. DONOHUE  
CHIEF

OLEN R. KAJIYAMA  
PAUL D. PUTZULU  
DEPUTY CHIEFS

November 26, 2003

Ms. Cindy S. Barger  
SBCT EIS Project Manager  
U.S. Army Corps of Engineers  
Honolulu District  
Attention: CEPOH-PP-E  
Building 230, Room 306  
Fort Shafter, Hawaii 96858-5440

Dear Ms Barger:

I thank you for the opportunity to review and comment on the Executive Summary of the Draft Environmental Impact Statement for the Transformation of the Second Brigade, 25<sup>th</sup> Infantry Division (L) to a Stryker Brigade Combat Team in Hawaii.

L6

Any increase in population as well as more vehicles on the public roadways will have an impact on calls for police services.

If there are any questions, please call Lieutenant Brian Chang of District 2 at 621-8442 or Ms. Carol Sodetani of the Support Services Bureau at 529-3658.

Sincerely,

LEE D. DONOHUE  
Chief of Police

By *Karl Godsey*  
KARL GODSEY  
Assistant Chief of Police  
Support Services Bureau

### Responses

L6-1

The Army has determined that, though there would be an increase in police services, these increases would not cause a significant impact on public services as a result of the proposed project. See Chapter 4.14 - Public Services and Utilities for a summary of these impacts.