

Comments

Responses

October 21, 2003

Letter
N1

Cindy Barger
SBCT EIS Project Manager
US Army Corps of Engineers
Honolulu district, Bldg 230, Room 306
ATTN: CEPOH-PP-E
Fort Shafter, HI 96858-5440

Dear Ms. Barger

N1-1 | I am writing to request an extension of the comment period for the Draft EIS for Transformation of the 2nd Brigade, 25th Infantry Division (L) to a Stryker Brigade Combat Team in Hawai'i to a minimum of 90 days.

The document is lengthy, complex and technical. The present 45 day comment period is inadequate for meaningful public participation. My conversations with many people in the community have confirmed this general sentiment.

We need more time to review the source documents from which findings and conclusions are drawn in the DEIS.

Thank you very much.

Sincerely,


Kyle Kajihiro
Program Director

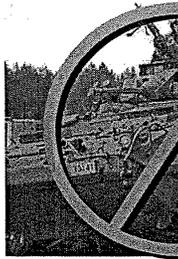
N1-1

The public comment period was extended to 90 days and closed on January 3, 2004.

Comments

Letter N2

The Stryker is an experimental 20-ton armored combat vehicle that the Army wants to deploy at six locations including Hawai'i. **The Army wants to station 296 Strykers in Hawai'i.** Here are some impacts taken from the Draft Environmental Impact Statement (DEIS) for the Stryker Brigade and other sources:



- The military controls around 200,000 acres of land in Hawai'i. The military already controls nearly 1/4 of the island of O'ahu.
- The Army wants to **acquire 25,663 acres of land**, an area nearly the size of the entire island of Kaho'olawe, including **23,000 acres at Pohakuloa** on Hawai'i island, and **1,400 acres at Honouliuli** on O'ahu. This would be a 12.8% increase in military land holdings, the biggest military expansion since World War II.
- The Army Stryker brigade would increase the **percentage of military-controlled land in Hawai'i from 10.8% to 11.4%.**
- Army expansion will have a **significant impact on Hawaiian cultural sites and practices.**
- **Live ammunition use would increase by 25%.** There will be an overall **significant increase in Unexploded Ordnance hazards.** Live-fire training would take place in Kahuku where no live fire was allowed in the past.
- Increased live fire training will **elevate the already alarming levels of toxic chemicals released**, such as:
 - **RDX**, an explosive compound, affects the **central nervous system and may cause cancer.**
 - **TNT**, an explosive compound, is a **carcinogen and also causes genetic mutations.**
 - **HMX**, an explosive compound, **damages the central nervous system and liver.**
 - **Nitroglycerine**, an explosive compound, affects the **blood and circulatory system.**
 - **Arsenic**, a poisonous metal and **Lead**, a poison that **affects the nervous system.**

N2-1

Where do these hazardous chemicals go when the bombs explode? What are the health impacts of these contaminants in our community?

Responses

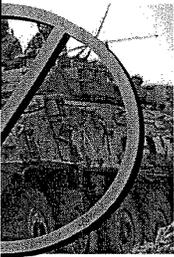
N2-1

Most of the compounds released by munitions use on military training ranges would be present as metal fragments, metal particles, or solid residues of various energetic materials. Small quantities of these materials would be released into the air during munitions firing and detonations. Some of the airborne releases would be carried by the wind beyond military installation boundaries, but the concentrations of these compounds would be too low to have any significant health effects. Weathering, corrosion, and leaching of munitions residues present on military training ranges would result in the slow migration of small quantities of various compounds from surface layers of soil into deeper soil layers, with soluble compounds slowly leaching into groundwater bodies. However, there are no indications that the weathering and leaching process is causing any significant contamination of groundwater resources.

Comments

Responses

N2-2



• The **military is the largest polluter in Hawai'i**, with over 1,000 military contamination sites and many that have not yet been identified. *What is the cumulative impact of all of this military contamination on the health, cultural survival and quality of life of our communities? How much total contamination and unexploded munitions have been released into our 'āina over the years?*

- Army vehicle **miles in maneuver will increase 300% overall, and 700% on Hawai'i island.**

- **Dust emissions would increase by 7 million pounds per year to a total of 13.4 million pounds per year.** How does this contribute to our disproportionately high levels of respiratory ailments such as asthma?

- **Fires will be a major threat** to endangered species, cultural sites and human health and safety. The Army relies on the same fire control plan that failed miserably in Mākua in July. *How will smoke and toxins released by wild fires affect the health of affected communities?*

N2-3

- **Significant impacts on endangered species.** *In the long run, how many species will be lost or severely diminished due to increased training, fires and alien species introductions?*

N2-4

- *Why does the DEIS not consider impacts of the C-17 cargo aircraft?*

N2-5

- **THE PROCESS IS INVALID:** Opponents of the Stryker Brigade were excluded from participating in two of the Stryker EIS meetings, and meeting locations are not accessible. Army regulations on NEPA state in part 651 of title 32 of the Code of Federal Regulations, Appendix E, (a) "EISs will: ... (4) Serve as a means to assess environmental impacts of proposed military actions, rather than justifying decisions." However Senator Inouye's press release June 26, 2003 stated: "Senator Inouye has been assured that one of the six Stryker Brigades will be based in Hawaii, and Schofield Barracks will be building new facilities, adding personnel, and increasing its land area to accommodate this unit."

For more information contact: AFSC Hawai'i at (808) 988-6266, email: afschawaii@afsc.org, or visit our website at www.afschawaii.org or Malu 'Āina (808) 966-7622.

N2-2

Chapter 3 of the EIS describes the affected environment for the proposed action's region of influence.

Cumulative impacts on health, cultural resources and socio-economics are addressed in Chapter 9. However, quantification of soil contaminants and UXO released over the past several decades is not available. The EIS does state in Section 9.5.2 that there would be a significant cumulative impact regarding UXO. The analysis in the EIS has been revised with an expanded discussion of UXO.

N2-3

Most wildfires caused by military training activities are relatively small, and generate correspondingly small quantities of smoke with little potential for health impacts to off-post locations. Chapter 4. 5 discusses the impacts of air borne contaminants. The Army has determined that the impacts to air quality from wildfires would be less than significant.

N2-4

Consultation between USFWS and Army has detailed measures that will serve to stabilize over 30 sensitive species in the ROIs on O'ahu and on the island of Hawai'i. Individual impacts to species are described in sections 4.10, 5.10, 6.10, 7.10, and 8.10.

N2-5

The EIS does acknowledge C-130 aircraft flights into and out of Wheeler AAF, and addresses the potential for impacts to aviation safety. The C-17 will not fly into WAAF but will fly into and out of Bradshaw Army Airfield and the impacts for PTA are considered in Section 8.4 - Airspace Use. The impacts of basing of C-17s at Hickam Air Force Base is a separate action and the NEPA document was prepared by the US Air Force for that project.

Comments

Responses

May 2004

Stryker Brigade Combat Team Final EIS, Hawaii

Letter
N3

STEVEN HURT

From: <CHURKEL@msn.com>
To: <eis@poh01.usace.army.mil>
Cc: <mjt93@juno.com>; <kiamanu@cuhawaii.net>; <meltan131@HOTMAIL.COM>
Sent: Friday, December 26, 2003 10:56 PM
Subject: STRYKER BRIGADE E.I.S. COMMENT

BIG ISLAND BIRD HUNTERS
17-124 PALAAI st
KEAAU HI
96749

Ms CINDY BARGER
US ARMY CORPS of ENGINEERS, HONOLULU DISTRICT
BLDG 230, CEPOH-PP-E
Ft.SHAFTER, HI96858-5440

Please accept the following comments for the DRAFT ENVIRONMENTAL
IMPACT STATEMENT for the "Transformation of the 2nd Brigade Combat Team in
Hawaii"

- N3-1 | 1. Purchase Keeamoku
- N3-1 | 2. Train our Military personnel
- N3-2 | 3. Continue cooperative efforts with recreational groups to revegetate
areas where practical

RESPECTIVELY
STEVEN HURT

PRESIDENT
BIG ISLAND BIRD

HUNTERS

N3-1

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.

N3-2

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.

Appendix P. Comments and Responses

Comments

Responses

Letter N4 Castle & Cooke Homes Hawaii, Inc.

P.O. Box 898900, Milliani, Hawaii 96789-8900

November 18, 2003

Ms. Cindy S. Barger, Program & Project Manager, Biologist
US Army Corp of Engineers
Building 230, Rm. 306
Fort Shafter, Hawaii 96858-5440

Re: Draft Environmental Impact Statement
Transformation of the 2nd Brigade,
25th Infantry Division (L) to a Stryker
Brigade Combat Team in Hawaii

Dear Ms. Barger:

Aloha and thank you for this opportunity to submit comments on the subject Draft
Environmental Impact Statement (DEIS). I am Ronald G. Nishihara, AIA of Castle &
Cooke Homes Hawaii, Inc. (CCHHI), which is acting as an authorized agent on behalf of
Dole Food Company Hawaii (Dole).

Our position is that the transformation of the 2nd Brigade to a Stryker brigade will have
generally positive impacts on the state and we are supportive. However we do have some
concerns with the routing of the Helemano and Dillingham Trails since they will impact
agricultural operations of both Dole and its lessees.

Comment #1: We take exception to the Army's position that our farm vehicles will not
be able to use the trails that will be constructed over our existing plantation roads.

Specific DEIS citations:

- "A perpetual easement of 55 acres (22 hectares) would be acquired for the
Dillingham Trail. The road would be constructed on private plantation roads owned
by Dole Food Co., Inc., and other private landowners. After the Proposed Action is
implemented, users of those plantation roads would use other roads to access
agricultural lands." [page 6-48]
"A perpetual easement of 27 acres (11 hectares) would be acquired for the Helemano
Trail and an easement for Drum Road (also known as Kahuku Trail) upgrade to
KTA. Helemano Trail is shown in Figure 2-7 in Chapter 2. The roads are proposed
on private plantation roads. If the Proposed Action were implemented, Dole Food
Co., Inc. would use other roads to access its agricultural lands." [page 7-50]

N4-1

N4-1

If the proposed project is selected and the Army decides to acquire this
easement, it will be a joint use road, accessible by both the property owner and
the Army. The Army will work with the property owners on a notification
process to minimize potential interference with regular farming practices. This
information has been added to Section 6.7.

Comments

Responses

Ms. Cindy Barger
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Page 2

N4-1
cont'd

Specific concerns:

- The plantation roads that are being considered for the Army's trails are some of the most critical to the operations of Dole and its lessees. In most cases, they are the widest and most efficient of the plantation roads. The taking of the primary plantation roads by the Army would create great economic hardship and inefficiency.
- Some equipment (such as our harvesting conveyor belt) cannot be moved on public streets because of their slow speed. In some cases, the main plantation road is the only access to certain fields for these pieces of equipment. Entire fields may become unusable for pineapple cultivation if the Army takes the main plantation roads.
- In the cases of some parcels, the plantation roads split the parcel. If access across the Stryker trail is not allowed, portions of these parcels will be landlocked and inaccessible.

Comment #2: We take exception to the finding that there will be "less than significant impact" to agricultural activities if the transformation plan proceeds as outlined in the DEIS.

Specific DEIS citations:

N4-2

- "Helemano Trail and Dillingham Trail would be constructed along agricultural roads or undeveloped land. Trail construction and use is not expected to significantly affect land use. Therefore, impacts from conversion of agricultural land to training land for the construction and use of military vehicle trails is a less than significant impact." [page 4-8]
- "All military vehicle trails would be made available for public use during state and national emergencies." [page 4-41]
- "The Proposed Action would also involve the acquisition of up to 1,400 acres of land, of which approximately 600 acres are currently under cultivation for pineapples. Some portions of the land acquired would no longer be useable for pineapple production. The military would use this area as rangeland. Economic effects could include reducing crop production and decreasing taxes paid to local and state government entities by land owners. Some employment could be affected, but the impact would likely be minor, given the size of the parcel and the minimal role agricultural production plays in the ROI [Region of Influence] economy. For example, agriculture accounts for only 0.5 percent of employment and only 0.4 percent of earnings in Honolulu County, and 1.7 percent of employment and 0.8 percent of earnings statewide (BEA 2002a). Since World War II, the role of the pineapple industry in the state economy has declined in place of tourism and defense." [page 4-95]

N4-2

The Dillingham military vehicle trail alignment shown in the EIS is the Army's preferred alignment. 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. If the proposed project is selected and the Army decides to acquire this easement, it will be a joint use road, accessible by both the property owner and the Army. The Army will work with the property owners on a notification process to minimize potential interference with regular farming practices. The farmland conversion rating forms are included in Appendix E of 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/or 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. The Final EIS concludes that the potentially significant impacts from fugitive dust can be mitigated to a level that is less than significant.

Comments

Responses

Ms. Cindy Barger
November 18, 2003
Page 3

N4-2
cont'd

- “According to the LOS [Level of Service] analysis, both state highway crossings would operate at LOS C under worst-case conditions. Convoy traffic would experience delays because they would yield to traffic along the state highways. Because the convoys would yield to through traffic, there would be no impact on LOS on public highways. The identified impact would be less than significant, and no mitigation would be necessary.” [page 6-49]
- Vehicle travel on unpaved areas at DMR and along the Dillingham Trail would increase by an estimated percent under the Proposed Action. The resulting PM₁₀ emissions would be approximately 537 tons (487 metric tons) per year, an increase of about 211 tons (191 metric tons) per year compared to the No Action conditions. Approximately 32 percent of the net increase in fugitive PM₁₀ emissions would be associated with vehicle travel on unpaved roads, while the remaining 68 percent represents potential emissions from off-road vehicle maneuvering activity.” [page 6-34]

Specific concerns:

- The concerns raised in Comment #1 also apply to this comment.
- We are concerned about the possibility of the roads being made available for public use during times of state or national emergency. Having public traffic traversing through the middle of our fields will be very disruptive to our farm operations. There will also be a tremendous increase in potential liability if two-way traffic is allowed on the 15-foot wide road, especially if the traffic is a mix of civilian vehicles, farm vehicles and Stryker or Stryker-related vehicles.
- While we do not necessarily dispute the facts in the bullet point above regarding the contribution of pineapple to Hawaii’s economy, the statement underlines that fact that it is very difficult to compete in a global economy with a commodity crop. Despite the tenuous nature of large scale farming, Dole recently invested \$4 million to change the variety of pineapple it grows in Hawaii in an effort to better compete in the global market. Any challenges to agriculture caused by the Army Transformation will only exacerbate the existing challenges facing large-scale farming. Should the challenges be the “straw that breaks the camel’s back”, and one of the two large companies shuts down its pineapple production, the impact on the rural landscape would be dramatic.
- Approximately 98% of Dole’s Hawaii operations are in pineapple cultivation employing between 250 to 300 people. While this may be a small number of people relative to the island’s population, the pineapple plantations remain a nostalgic icon in the minds of many local residents. Losing pineapple cultivation on Oahu will be another bitter pill for the residents to take.
- The DEIS also does not address the impact on our smaller diversified farmers. Larry Jeffs’ farm on TMK 6-8-002:005 and 6-8-002:009 is one of the most successful diversified agricultural operations in the state. The Stryker trail cuts through the

N4-3

N4-4

N4-5

N4-3

Thank you for your comment. Your comment has been considered and incorporated into the administrative record. The overall impacts from the Proposed Action on agricultural production and economy are discussed in Section 4.2 and 4.13.

N4-4

Thank you for your comment. Your comment has been considered and incorporated into the administrative record. The overall impacts from the Proposed Action on agricultural production and economy are discussed in Section 4.2 and 4.13.

N4-5

Future property values are based on several factors that fall outside of the purview of the Army action. It would be speculative in nature for the Army to assume either positive or negative impacts to adjacent property values. If the Army decides to implement the proposed action, the Army will implement mitigation measures to help keep the proposed action to less than significant levels of impact where practicable.

Comments

Responses

Ms. Cindy Barger
November 18, 2003
Page 4

N4-5 | lands he leases from Dole (see Figure 6-6 on page 6-13). The trail will not only
cont'd | greatly impact his operations, it will lower the value of the parcels.

N4-6 |

- The LOS analysis that was done only considered vehicular traffic on the public streets. No analysis was done on the backlog of vehicular traffic that will occur on private property, especially near the Dole packing plant. As summarized in the attached Exhibit A, Dole is in the processes of shifting from in-field packing to centralized packing in the packing plant. \$2.2 million will be spent to execute this conversion, which will be completed by April, 2004. Once the conversion is completed, we anticipate that one truck will be arriving at the packing plant to unload every twelve minutes. The exact routing of the Dillingham and Helemano Trails is not clear in the DEIS and we will be in a better position to comment if we could review a site plan of the proposed trails relative to the fields and structures. Vehicular congestion around the packing plant will create hazardous conditions because of the frequency of the vehicle arrivals.
- Currently, the pineapple crops along the sides of the plantation roads are damaged as a result of being coated by fugitive dust. Generally, the majority of this fruit is either lost or must be used for fresh-cut product as opposed to fresh whole fruit. The increase in fugitive dust could result in further crop damage and lost revenue for Dole.

N4-7 |

- The added fugitive dust will also negatively impact Castle & Cooke's Dole Plantation. Dole Plantation is an agricultural tourism operation, which receives worldwide publicity because it's the home to the world's largest maze. An average of 2,500 visitors per day enjoy the outdoor attractions at Dole Plantation.

In conclusion, despite the challenges of local large-scale agriculture competing in a global market, Dole has invested over \$6.2 million in the past year to remain competitive. In addition, the success of diversified agriculture has increased dramatically in the past few years. We ask for your kokua in working with our lessees and us to minimize the impact on our operations. To this end, we look forward to working cooperatively with the US Army to insure the viability of agriculture in Hawaii, responsible stewardship of the land, and the successful transformation of the 2nd Brigade into a Stryker Brigade Combat Team.

God Bless America!



Ronald G. Nishihara, AIA
Project Manager-Special Projects

N4-6

In the Final EIS, the Army has expanded the discussion in Chapter 9 on the cumulative impacts to land use from the conversion of agricultural lands and on socioeconomic impacts. The Army determined the cumulative effect on the loss and conversion of agricultural land from past, present, and reasonably foreseeable actions is significant.

N4-7

Based on EPA guidance, we have conducted a more detailed air quality analysis incorporating mitigation measures into the air quality modeling to reduce the impacts from dust to levels within EPA standards for the Clean Air Act. To ensure dust remains within these levels, if the Army decides to implement the proposed action, the Army will develop an SBCT Off Road Maneuver Dust and Soils Management and Monitoring Plan for the training area. The plan will determine how training will occur in order to keep fugitive dust emissions below CAA standards for PM10 and soil erosion and compaction to a minimum. The Army will monitor the impacts of off road maneuver training activities to ensure that emissions stay within the acceptable ranges as predicted and environmental problems do not result from excessive soil erosion or compaction. The plan will also define contingency measures to mitigate the impacts of off road maneuver training activities which exceed the acceptable ranges for dust emissions or soil compaction.

HONOLULU ADVERTISER 10/25/03

\$2.2M upgrade planned at Dole packaging plant

By Sean Hao
ADVERTISER STAFF WRITER

Dole Food Company Inc. said yesterday that it will spend about \$2.2 million upgrading its pineapple packing plant in Central O'ahu. The goal is to increase efficiency and the level of quality of packed pineapple, said Brian Orlopp, general manager for Dole's Hawai'i operations.

The upgrade, which involves acquiring new equipment, comes amid growth in pineapple sales in Hawai'i.

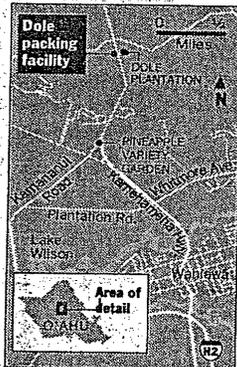
After falling 5 percent in 2001, farm-level sales of pineapple rebounded 4 percent last year to \$100.6 million. The gains were a result of a greater mix of sales from higher-value fresh pineapple products.

The industry is shifting production to increasingly popular, extra-sweet pineapples. Maui Land & Pineapple Co. now is shifting all of its Hawai'i production to its new premium Hawaiian Gold variety, while Dole is shifting production to its comparable Premium Select brand.

"We've got a lot of resources here and we want to make a go of it the best we can in Hawai'i," Orlopp said.

The Dole factory upgrade will have no impact on the company's employment level, which ranges between 250 to 300 people in Hawai'i, Orlopp said.

The company's packing plant is on Kamehameha



The Honolulu Advertiser

Highway, across from the Dole Plantation Store.

In addition to the Pineapple Express Train, the Pineapple Garden Maze and the Pineapple Garden Tour, the store plans to open a restaurant. The company closed its Hawai'i cannery in the early 1990s.

Dole, which generated \$4.4 billion in sales last year, typically has between 3,000 and 4,000 acres of pineapple planted at any time. Earlier this year Dole was taken private by David Murdock in a \$2.5 billion deal, which propelled the billionaire into position as one of Hawai'i's biggest private landowners with more than 123,000 acres in the Islands.

Reach Sean Hao at shao@honoluluadvertiser.com or 525-8093.

Comments

Responses

May 2004

Stryker Brigade Combat Team Final EIS, Hawaii

P-169

Letter
N5
Castle & Cooke
Homes Hawaii, Inc.

P.O. Box 898900, Mililani, Hawaii 96789-8900

January 2, 2004

Ms. Cindy Barger, Program & Project Manager, Biologist
Bldg. 230, Room 306, ATTN: CEPOH-PP-E
Ft. Shafter, Hawaii 96858-5440

Re: Written Testimony supporting the Army Transformation

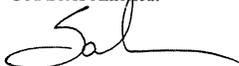
Dear Ms. Barger,

I am Harry A. Saunders, III, President of Castle & Cooke Homes Hawaii, Inc., which is acting as an authorized agent of Dole Food Company, Inc. (Dole) with regard to its lands on the North Shore of Oahu. Both the Helemano and Dillingham Trails are proposed to be located on Dole-owned lands.

While this may pose a minor inconvenience for our plantation operations, we understand and appreciate the importance of a well-trained military. Any sacrifice we make is small compared to the sacrifices of the men and women in our armed forces.

We are writing in support of the Army Transformation and look forward to working cooperatively with the US Army.

God Bless America!



Harry A. Saunders, III
President

cc: Ronald Borne – U.S. Army Garrison
Brian Orlopp – Dole Food Hawaii, Inc.

N5-1

N5-1

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.

Appendix P. Comments and Responses

Comments



The Chamber of
Commerce of Hawaii

Since 1850

Responses

Letter
N6

November 14, 2003

Ms. Cindy Barger
U.S Corps of Engineers, Honolulu District
Bldg 230, CEPOH-PP-E
Ft. Shafter, HI 96858-5440

Dear Ms. Barger:

The Chamber of Commerce of Hawaii submits written testimony in favor of the decision to proceed with transformation and designating Hawaii as one of six locations for the initial positioning a Stryker Brigade Combat Team (SBCT).

N6-1

The Chamber is well aware of the U.S. Defense Department's security plans for the Asia Pacific region. The forward presence of a strong military force in the region has been very successful in deterring war and quelling internal strife in unstable nations. This has enabled the region to enjoy unprecedented peace and stability, which, in turn, has provided economic security within the region and facilitated the growth of a thriving global economy. We are well aware that a war or any uncontrolled internal strife within a nation could disrupt the economies of the nations in the region.

Moreover, we strongly advocate a policy of deterrence as it provides for peaceful means to settle disputes and avoids the needless loss of lives and property.

We believe that the positioning of a SBCT in Hawaii will add greater visibility in the U.S. policy of deterrence and provides a means by which the U.S. can respond quickly to protect the U.S. homeland and nations in the region and the lives of U.S. citizens serving abroad.

N6-2

We do, however, believe that the EIS should clearly state that the Makua Military Reservation would still be needed to train U.S. combat forces in Hawaii. It has been stated publicly by the Army, and implied in the EIS, that Makua may not be needed once the training facilities on Schofield Barracks are upgraded to handle dismounted CALFEXs. We understand that the Marines, National Guard, and Reserve forces will have a need for the training facilities at Makua.

We appreciate the opportunity to provide testimony on this EIS.

Sincerely,

Jim Tollefson
President & CEO

N6-1

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.

N6-2

As stated in Chapter 1, SBCT training requirements are not dependent on the use of the Makua Military Reservation (MMR). While MMR is an integral part of USARHAW training capabilities and historically used by other services, SBCT units could perform dismounted CALFEX training at other ranges. SBCT may use MMR if the range were available only after completion of the Makua EIS and ROD. The Makua EIS will analyze the potential environmental impacts associated with dismounted CALFEXs for both Current Force and SBCT; therefore, this SBCT EIS does not analyze training impacts of SBCT at MMR.

Comments

Responses

Conservation Council for Hawai'i

P.O. Box 2923
Honolulu, Hawai'i 96802
(808) 593-0255 phone, fax
info@conservehi.org www.conservehi.org



Letter
N7

January 3, 2004

Cindy Barger
U. S. Army Corps of Engineers, Honolulu District
Bldg. 230, CEPOH-PP-E
Fort Shafter, Hawai'i 96858-5440

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

Dear Ms. Barger:

Aloha. The Conservation Council for Hawai'i offers the following comments on the Department of the Army's Draft Environmental Impact Statement Transformation of the 2nd Brigade, 25th Infantry Division (L) to a Stryker Brigade Combat Team in Hawai'i, dated October 2003 (DEIS). CCH is a science-based community organization dedicated to preserving biodiversity and restoring the integrity of native Hawaiian ecosystems from the top of the mountains to the coral reefs for the ecological, social, cultural, and economic well-being of Hawai'i. We were lead plaintiff in legal actions to compel the listing and designation of critical habitat for over 250 endangered Hawaiian plants and animals, including species found on Army-controlled lands. We also participated in a working group convened by the Army to address species conservation issues at the Pohakuloa Training Area. We are concerned about the proposed expansion of Army training activities in Hawai'i in light of the Army's history of species conservation in the islands. The Army has violated laws enacted to protect human health and safety, native species and ecosystems, and cultural resources, and has yet to fully mitigate the impacts of its past and ongoing activities. Any decision to increase Army training activities and land under Army control must be carefully considered within the context of past and ongoing Army actions.

General Comments

N7-1

The DEIS is deficient in justifying the need to establish a Stryker Brigade in Hawai'i, as opposed to more appropriate training areas to accommodate what is, essentially, an urban-warfare capacity. The Army must identify and assess all reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions on the quality of the human environment. 40 CFR 1500.2(e). The DEIS pays short thrift to this critical alternatives analysis required by the National Environmental Policy Act.

N7-1

The decision to transform in Hawai'i was analyzed in the Final Programmatic EIS completed on March 8, 2002. The Record of Decision for this EIS was signed on April 11, 2002. All the factors considered for transforming in Hawai'i are included in that Final Programmatic EIS. The Stryker Brigade is not intended solely as an urban-warfare force. Transformation will allow it to better operate under those conditions but will be expected to operate in all battle situations. The discussion regarding why transformation is to take place in Hawai'i can be found in Chapter 1 – Purpose, Need, and Scope of this EIS. However, options of transforming in Hawai'i and training elsewhere are discussed in the EIS. Please see Section 2.6 in the EIS.

Comments

CCH comments Stryker Brigade DEIS
January 3, 2004
Page 2

N7-2

At its core, NEPA requires federal agencies to take a hard look at all of the alternatives to a proposed action before a decision is made. Despite this clear mandate from Congress, the Army has turned NEPA on its head by announcing its decision to bring the Stryker Brigade to Hawai'i while the public comment period for the DEIS is still open. The law is clear that environmental impact statements "shall serve as the means of assessing the environmental impact of proposed agency actions, rather than justifying decisions already made." 40 CFR § 1502.2(g). If a decision has already been made to bring the Stryker Brigade to Hawai'i, by way of this letter, we request a copy of the index of documents supporting the Record of Decision and a description of how this decision was made in relation to the pending DEIS.

N7-3

Furthermore, the Army is now suggesting modifications to the proposed action, including increased firepower and size of the Brigade and/or vehicles. If this is the case, NEPA requires the Army to supplement the DEIS and analyze the impacts of the proposed modifications. We request a description of any and all modifications to the proposed action and an explanation as to why these modifications were not included in the DEIS as an alternative. We also urge the Army to comply with NEPA by supplementing the DEIS so that any recent modifications to the proposed action are publicly disclosed and properly analyzed.

N7-4

Hawai'i is the endangered species capital of the U. S. Approximately one-third of the nation's listed threatened and endangered species are unique to these islands. Army training and associated activities in Hawai'i occur on extremely sensitive public-trust lands that support rare and endangered species, as well as special and unique cultural features. Military training has contributed to the imperiled status of native species on Army-controlled lands, and the proposed action has serious consequences for those species and their habitats that remain. Adverse impacts of Army training in Hawai'i include:

- recurring fires caused by live-fire training activities, subsequent invasion and displacement of native species by introduced fire-tolerant grasses and other invasive species, and increased fire fuel loads as grasses become established;
- large populations of uncontrolled ungulates (especially goats and sheep) in the absence of adequate public hunting as a control and Army removal of these animals from impact zones, subsequent loss of native vegetation, erosion, alien weed invasions, and loss of seed source for regeneration of native plants;
- rats, which are flushed out of vegetation during fires and which feed on native tree and land snails, seeds, fruits, and bark of native plants;
- trampling of native vegetation and soil compaction from foot and vehicular traffic;
- introduction of alien weeds via imported soil, gravel, and other ground covers and from landscaping, vehicles, and troops;
- controlled burns that go out of control and destroy endangered species and native vegetation; and
- contamination of soil, water, and air by dust, emissions, fire retardants, and other pollutants.

Responses

N7-2

The decision to transform in Hawai'i was analyzed in the Final Programmatic EIS completed on March 8, 2002. The Record of Decision for this EIS was signed on April 11, 2002. All the factors considered for transforming in Hawai'i are included in that Final Programmatic EIS. The discussion regarding why transformation is to take place in Hawai'i can be found in Chapter 1 – Purpose, Need, and Scope of this EIS. However, options of transforming in Hawai'i and training elsewhere are discussed in the EIS. Please see Section 2.6 in the EIS. Details on the PEIS and contacts for information can be found on the following website http://notes.tetrattech-ffx.com/army_transformation_peis/final_peis.htm or by writing to Headquarters, Department of the Army ATTN: ODCSOPS (DAMO-FMF), 400 Army Pentagon Washington, DC 20310-0400.

N7-3

After the publication of the Draft EIS, the Army announced plans for an enhancement package for SBCTs. The enhancements include an aviation task force, an increase from twelve to eighteen 155mm howitzers in the direct support artillery battalion, and improvements to command, control, communications, computer, and intelligence (C4I) assets. The announcements indicated that the aviation task force would include Comanche helicopters when the aircraft were ready for fielding. In February 2004, the Army determined that no further testing or fielding of Comanches would occur and canceled the Comanche program. The SBCT aviation task force will come from existing 25th ID(L) aviation brigade assets and will result in minor changes to training, primarily some increased aviation training over WPAA in support of units training in that area. The FEIS has analyzed the impacts of the increased aviation training over WPAA and those impacts are minimal. The Draft EIS analyzed the impacts of twelve 155mm howitzers, a change from the eighteen 105mm howitzers currently in the direct support artillery battalion for 2nd brigade. The addition of another six 155mm howitzers was analyzed in the FEIS and resulted in minimal changes to noise impacts and no change in the overall determination of effect. The C4I improvements are not expected to have any impacts on the environment. Overall, the Army has determined that the enhancements are within the original scope of the proposed action as described in the Draft EIS, are minor in nature, and do not require a supplemental Draft EIS.

Comments

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N7-5 | The DEIS is deficient in identifying and evaluating the cumulative impacts of the proposed action to rare and endangered species, their habitats, and native ecosystems, as well as cultural sites and public-trust lands. NEPA regulations define "cumulative impact" as the impact that results from the "incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions . . . taking place over time." 40 CFR § 1508.7. Determining the cumulative impacts of the proposed action should be one of the most rigorous analyses of this process.

N7-6 | We also question the qualifications of Tetra Tech to prepare the DEIS. We understand that Tetra Tech's experience is in environmental monitoring and clean up, not in preparing NEPA documents. Was there a special reason why this company was chosen?

Schofield Barracks and Makua Mitigation Plan

N7-7 | The Army must comply with the federal Endangered Species Act and other laws as they relate to training and resource protection. Schofield Barracks provides habitat for dozens of rare and endangered species. As recently as 10 years ago, fires started by military training were a regular occurrence at Schofield Barracks. What is the Army's recent record for fire prevention and control at Schofield? Has the Army completed formal consultation with the U. S. Fish and Wildlife Service for existing/ongoing live-fire training and associated activities at Schofield, as required by the Endangered Species Act? If so, what was the result of the consultation? What, specifically, is the Army required to do to mitigate adverse impacts to rare and endangered species and their habitat? How does the proposed action affect any existing mandates and conservation programs?

N7-8 | Dozens of endangered plants, endangered kahuli tree snails, and endangered O`ahu `elepaio are also found in and around the Makua Military Reservation. Endangered species populations and habitat at MMR have been destroyed or compromised by live-fire training and associated activities over the decades. A mitigation plan is required under Section 7 of the Endangered Species Act at MMR, so the Army may continue training there. Our understanding is that the mitigation plan has not been fully staffed or implemented yet, even though live-fire training and associated activities have resumed. What is the status of the mitigation plan, and why hasn't the Army implemented it yet? How are the Makua mitigation plan and proposed Stryker Brigade at Schofield Barracks related? Are any areas proposed for the Stryker Brigade at Schofield and elsewhere required for the Makua mitigation plan? What are the cumulative effects of the proposed Stryker Brigade on rare and endangered species and their habitats at Schofield Barracks, MMR, and other areas, regardless of whether the Army occupies those areas?

Responses

N7-4
 The discussions in Sections 4.10 have been expanded to better discuss the impacts to biological resources. For some of the impact areas such as the impact of wildland fires on biological resources, the Army has changed the determination of effect to significant. Mitigation measures have been identified to substantially reduce the severity of the impact but not to less than significant levels.

N7-5
 The cumulative impact analysis in Chapter 9 assesses the cumulative impact of among other resources, cultural and biological resources, including impacts to rare and endangered species, their habitats, and native ecosystems, as well as cultural sites and public-trust lands. Based on public comments and the final BOs issued by USFWS for this proposed action, Section 9.5.2 - Biological Resources section has been updated with a corrected determination of significant and unmitigable.

N7-6
 Tetra Tech has prepared EISs, EAs, and other environmental analyses for federal, state, and local agencies around the country. Recent NEPA documents include the Salton Sea EIS, Gunnison Gorge Resources Management Plan and EIS, and management plans and associated documents for Naval Air Station Fallon, Naval Air Station China Lake, and other agencies. In accordance with federal regulations, Tetra Tech was selected as the contractor best suited to prepare the EIS out of several environmental firms because of their qualifications in developing NEPA documentation overall as well as specific experience in Hawai'i and on military projects.

N7-7
 Consultation with USFWS has been completed and Biological Opinions released for Army Installations on O`ahu and Hawai'i. These documents detail extensive management directives for the Army to comply with the ESA. The Army has expanded the discussions on impacts to biological resources in sections 4.10, 5.10, 6.10, 7.10 and 8.10. In some of the cases such as the impact to biological resources from wildland fires, the Army has changed the determination to significant. Mitigation measures are proposed that will substantially reduce the impact but not to less than significant levels.

Comments

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Pohakuloa Training Area

N7-9

Up until the proposed Stryker Brigade, the Army had been training at the Pohakuloa Training Area on Hawai'i for decades without ever having prepared an environmental impact statement for training and associated activities. Similarly, the Army only began formal consultation with the U.S. Fish and Wildlife Service, as required by Section 7 of the Endangered Species Act, after it proposed to bring the Stryker Brigade to Hawai'i. Prior to that, the Army had been consulting "informally" with the Service since 1997 at PTA while live-fire training was ongoing – a clear violation of the law.

N7-10

In addition, the Army has yet to honor the terms of its settlement agreement over a lawsuit filed by the late Ruth Leilani Stemmermann over a decade ago. By way of background, in 1989, Dr. Stemmermann, a Big Island botanist who studied the native ecosystems at PTA, sued the Army for failing to prepare an environmental impact statement for the Multi-Purpose Range Complex, a proposed live-fire training range in the southwestern portion of PTA. Dr. Stemmermann agreed to settle the lawsuit on appeal in 1990. According to the settlement agreement, the Army must:

- prepare an EIS to address the impacts associated with operating the MPRC, and cannot operate the range until an EIS has been completed;
- consider the "no use" or "no action" alternative for the MPRC, which includes use for purposes other than live-fire training; and
- to the extent feasible, undertake site restoration to permit the area to revert to its natural state, if the "no use" or "no action" alternative is adopted.

For several years, the Army had no plans to use the MPRC. Then in 1997, when it was reminded of the settlement agreement, the Army proposed to use the range for limited, non-live-fire training. A year later, the Army decided it would not use the range for any training purposes. In 1999, the Army said it would prepare an EIS for the use of the MPRC for conservation purposes as mitigation for training elsewhere at PTA. At a public meeting in September 2000, the Army announced that it needed to build another MPRC somewhere else, and that it was considering site restoration. To date, the Army has not prepared an EIS for the MPRC, and the site has not been restored.

The MPRC is located in Kipuka `Alala, a biologically rich and important area for native vegetation and wildlife. The best remaining dryland ecosystems in the Hawaiian islands are found in the western third of the PTA, including the MPRC. The site is dominated by old-growth, high-elevation naio, `ohi`a, and mamane dry forests, and other uncommon native ecosystems. The site provides habitat for several rare and endangered species, including the `ope`ape`a, nene, `io, `elepaio, honeycreepers, Hawaiian plants, and dozens of native land snails and insects.

Responses

N7-8

The results of ESA Section 7 consultation include development of an O'ahu Implementation Plan funded by the Army. The individual measures determined in Section 7 to substantially mitigate from Army actions are outlined in the biological resource sections of each chapter; 5.10, 6.10, 7.10, 8.10 though not to less than significant levels in all cases.

N7-9

Army activities at the Pohakuloa Training Area began in the 1940s with the cantonment area constructed in 1955. Many of the Army actions in this area were either constructed and implemented before NEPA (1969) and therefore grandfathered in under the statute or have been covered under individual NEPA evaluations such as environmental assessments. The Biological Opinion issued by the USFWS in December 2003 covered ongoing actions under the current force and those proposed under SBCT.

N7-10

As discussed in Chapter 8, there is no SBCT training planned for the Multi Purpose Range Complex (MPRC).

Comments

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**N7-10
 cont'd**

Construction of the 1,500-acre MPRC began in 1988 and was nearly complete in 1990. Features of the range include an elaborate network of access roads, moving and stationary armor and personnel targets, administration area, control tower, water towers, storage building, 18 miles of power line, 495 power poles, and softened sites, which were graded, cleared of vegetation, and covered with gravel or cinder.

The full extent of the destruction caused by MPRC will never be known because the Army did not allow its biological consultants to complete environmental surveys and analyses before construction began. Instead, hundreds of thousands of dollars were spent and extensive biological surveys were conducted only after the MPRC was constructed. The studies confirmed what Dr. Stemmermann and others knew all along: that the MPRC site is a biological treasure full of rare and endangered species and ecosystems, and that the range never should have been built at Kipuka `Alala.

In 1993, the U.S. Army Audit Agency issued a scathing report criticizing Army Support Command, Hawai`i for failing to obtain information from its environmental experts during the MPRC site selection process, failing to ensure that projects (including the MPRC) are reviewed by its environmental committee, and failing to ensure that recommendations made by outside organizations other than the military are adequately considered. Native species and ecosystems were undoubtedly destroyed when the MPRC was constructed, and, although the range has never been used, the ecological integrity of the area has been compromised by alien species.

What is the status of the settlement agreement with Dr. Stemmermann and the Army's use of the MPRC area? How will Kipuka `Alala and other sensitive areas at PTA be affected by the proposed Stryker Brigade, including cumulative effects on rare and endangered species and their habitats?

Mitigation for Past and Ongoing Actions

N7-11

Our review of the Army's environmental activities in Hawai`i indicates that the Makua mitigation plan is only half staffed, and that at a minimum, the existing environmental field staff of roughly 18 people and the current budget of approximately \$1-1.5 million for species/ecosystem conservation need to be doubled just to meet existing commitments and requirements for Army-controlled lands on O`ahu. If the Stryker Brigade is brought to O`ahu, at least three times the existing staff and budget would be needed to float existing staff and mandates and to try and mitigate the additional impacts of the Stryker Brigade, including resource-intensive surveys and weed control.

N7-11

Thank you for your comment. If the Army decides to implement the proposed action, the Army will ensure that the mitigation programs are adequately staffed as part of the commitment to mitigation. In accordance with federal hiring practices, the Army is required to be fair in all hiring practices - specifying only the specific requirements or training for a position. However, the Army is committed to working with the local communities and individuals throughout the implementation of any of the Army actions.

Comments

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Page 6

**N7-11
cont'd**

On the Big Island, weeds and fire are the most significant threat to the survival of rare and endangered species at PTA. In addition to the existing environmental field staff of around 12 people, a field crew of at least 20 people to control weeds is needed for the next 3-5 years (possibly longer), and a tripling of the current budget for species/ecosystem conservation at PTA are needed to control existing weeds and implement existing projects.

A long-term commitment by the Army to fund species/ecosystem conservation is appropriate mitigation for past destruction and losses, and for ongoing training and associated activities, regardless of how long the Army occupies these lands. We recommend that technical review committees for each Army installation in Hawai`i be established to oversee the protection and management of natural and cultural resources. Concerned citizens, government agencies, and non-government organizations would be invited to participate as members. We also urge the Army to hire local biologists, cultural practitioners, and other experts to protect natural and cultural resources on Army-controlled lands.

N7-12

Finally, we were disappointed in the Army's exclusion of certain concerned citizens from meetings and field trips to PTA, and its treatment of citizens participating in recent public hearings on the DEIS. We hope that, in the future, the Army will treat everyone fairly and with respect, including those who do not agree with the Army's point of view.

Mahalo nui loa for the opportunity to comment on the DEIS. We look forward to your response.

Sincerely,

Marjorie Ziegler
Executive Director

c: Hawai`i Congressional Delegation
Office of Environmental Quality Control

N7-12

We thank you for your comment and understand your concern. It was not the intent of the Army to restrict the public through the format and location of the public meetings. Once the issue arose, we worked to correct the situation by working with the other facility locations to allow signs in the actual meeting rooms and provide tables for members of the public to display signs and information. In addition, we worked with the facilities and the City and County of Honolulu's prosecutor to have all charges dropped against the individuals involved in the situation. Through these measures and the extension of the public comment period, we believe we allowed opportunity for the public to comment either orally or in writing.

Comments

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Letter N8

Subject: Comments - Draft Environmental Impact Statement (DEIS)

Transformation of the 2nd Brigade, 25th Infantry Division (L)
To a Stryker Brigade Combat Team in Hawaii

DMT Consultant Engineers has been contracted by the Hawaii State Department of Transportation (HDOT) to conduct engineering studies and prepare an Environmental Impact Statement (EIS) for the Saddle Road Extension Project, DP-HI-0200 (5) (Notice of Intent published in the Federal Register on July 13, 1999). The Saddle Road Extension is located in the South Kohala District of the Big Island and is a proposed highway connection between Mamalahoa Highway (SR 190) and the Queen Kaahumanu Highway (SR 19). The Saddle Road Extension will begin at the intersection of Waikoloa Beach Drive and the Queen Kaahumanu Highway and will end in the vicinity of the intersection of Mamalahoa Highway and the W-3 alignment of the proposed Saddle Road Improvement Project, Project No. HI A-AD-6 (1), as developed by the Federal Highways Administration (FHWA).

For the proposed Saddle Road Extension, preliminary engineering plans for three alternative alignments have been prepared and a significant portion of the associated environmental fieldwork has already been completed. Publication of the Draft Environmental Impact Statement (DEIS) is anticipated in late Summer of 2004.

Based on our experience with the project area, we would like to provide supplemental information to that stated on page 8-79 of the Transformation DEIS. The second paragraph states that one of the recommendations of the Hawaii Long Range Land Transportation Plan (LRLTP) is to:

N8-1

Realign the western section of the Saddle Road to the intersection with Mamalahoa Highway at Waikoloa Road

The DEIS goes on to state that this improvement may have impacts to the proposed action but that a schedule was not available at the time of publication. The Transformation EIS preparers should be aware that the proposed Saddle Road Improvements, Project No. HI A-AD-6(1) by FHWA has studied the realignment of the western section of the Saddle Road (W-3 Alignment)

N8-1

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 (FHWA), 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 FHWA to minimize impacts to traffic along the new Saddle Road.

Comments

Responses

**N8-1
cont'd**

and has selected a location for the intersection which is different from that indicated by the LRLTP (approximately three miles South of Waikoloa Road). In order to achieve an appropriate intersection location for both Saddle Road Projects, studies of the proposed Saddle Road Extension, Project No. DP-HI-0200 (5), have further indicated that the W-3 Alignment/Mamalahoa Highway intersection should be relocated to an area which is approximately 1.2 miles to the North of the original location proposed.

We believe that it may be prudent for your studies and for the location of your permanent facilities and operations to consider these latest revisions of the W-3 alignment. For your information, the proposed minimum right-of-way width to accommodate improvements along Saddle Road is 150 feet.

Should you have any questions or require any additional information please do not hesitate to call me at (808) 961-5527.

Sincerely,
Joel Nakamoto, P.E.
Project Engineer
DMT Consultant Engineers
Hilo Office
200 Kohola Street
Hilo, HI 96720
Ph: (808) 961-5527
Fax: (808) 961-5529

May 2004

Stryker Brigade Combat Team Final EIS, Hawaii

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Responses

See next page

**CLEAN UP, NOT BUILD UP
NO MILITARY EXPANSION IN HAWAII**

1. We oppose military expansion in Hawaii, including the build up and destruction of Hawaiian lands by military forces in Mākuā, Pohakuloa, Honouliuli and Waikāne, the restriction of access to Nohii, Kāua'i and Keawe'ūia, O'āhu; Navy testing of sonar and missile defense systems off of Kaua'i, and warfare-related research using high-tech computer and astronomy facilities on Mauna Kea and Haleakala.
 2. The military must clean up, restore and return military-controlled lands, including Kahaloawe, Pohakuloa, Mākuā, Waikāne, Nohii, Mokuapu, Lāhualāe, Wāhiawā, Waimānalo/Bellows, Pu'uolo/Pearl Harbor, Kalia/Port DeKanyssy and Kahuku.
 3. End Hawaii's economic dependency on military spending by redirecting funds to clean up the environment and to develop environmentally sustainable, community-based economic alternatives.
 4. The military must pay just compensation for its use of and damage to Hawaiian lands.
- We are taking back our land and our lives from militarism. Our common security depends on having clean air, land and water, an economy that meets basic human needs and the perpetuation of our cultures.

NAME	ADDRESS	TELEPHONE	EMAIL
1. Sandy Sathya	94094 Anua Dr #109 Milpau, HI 96719	(808) 6250512	
2. Lindsay Mahuereka	47-633 Laka Pl Kaneohe 96744	(808) 239-6389	lmauereka@aol.com
3. Cathy Dwyer	95-528 Waiola Ln Milpau, HI 96719	625-3551	
4. Jacek Szymonye	42-1195 Makamui Ln Kapolei, HI 96767	672-4758	
5. Linda Ketaki	2733 Kapiolani Blvd #1 Honolulu, HI 96826	949-4597	
6. Kiko Mulla	2591 Ave St Honolulu HI 96822	777-1814	
7. Justin Kim	65-48 Lindbergh Pl Milpau HI 96719	451-1520	
8. Kaimo Frank	P.O. Box 482 Hilo HI 96720	(808) 940-1119	kaimo@frankgroup.com
9. Imani Kalinara	P.O. Box 69 Waiwala, HI 96796	(808) 692-2461	KALIMANARA@YAHOO.COM
10. Brittany Manardic	1324 Heketaia Hwy Kula, HI 96740	(808) 283-0214	

810002 DMZ Hawaii - Aloha 'Aina Campaign c/o:
(O'ahu) American Friends Service Committee Hawaii, 2426 O'ahu Avenue, Honolulu, HI 96822; (808) 988-6266; afshawaii@afsc.org
(Hawaii) Malu Aina Center for Nonviolent Education and Action, P.O. Box AB, Olu'a, HI 96760; (808) 966-7622; www.malu-aina.org

Letter N9 See next page

Comments

Responses

- N9-1** | 1. We oppose military expansion in Hawai'i, including the build up and destruction of Hawaiian lands by military forces in Makua, etc.
- N9-2** | 2. The military must clean up, restore and return military controlled lands
- N9-3** | 3. End Hawai'i's economic dependency on military spending by redirecting funds to clean up the environment and to develop environmentally sustainable community-based economic alternatives.
- N9-4** | 4. The military must pay just compensation for its use of and damage to Hawaiian lands.

N9-1

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.

N9-2

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. If the Army chooses to relinquish ownership of the land as a result of a Base Realignment and Closure (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.

N9-3

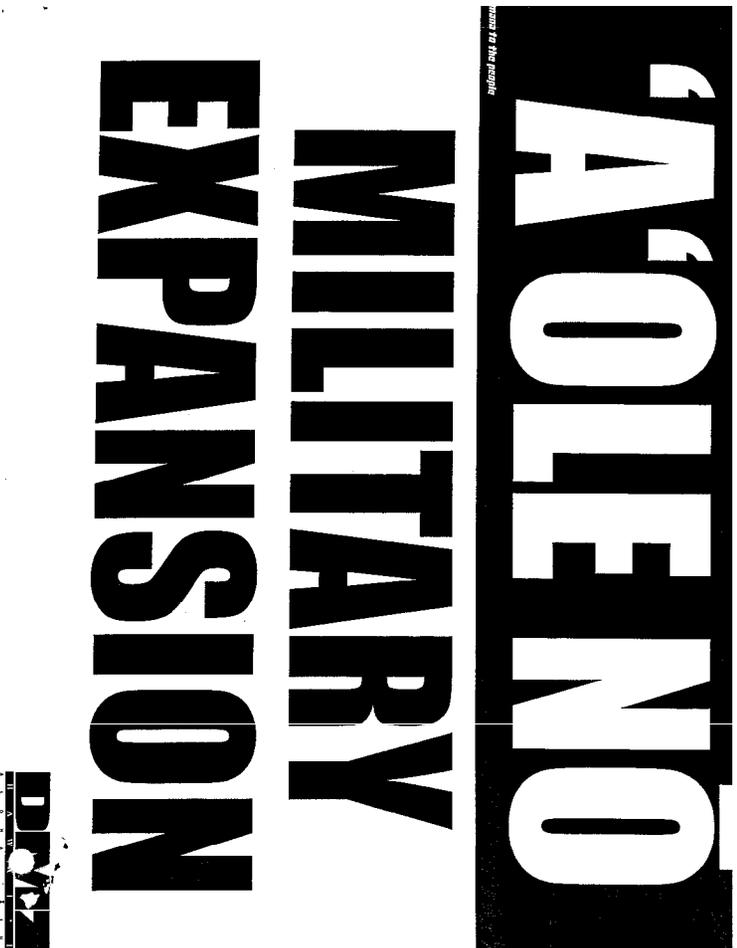
We thank you for your comment and participation in this public process. Your comment has been considered and has been included as part of the administrative record for this process.

N9-4

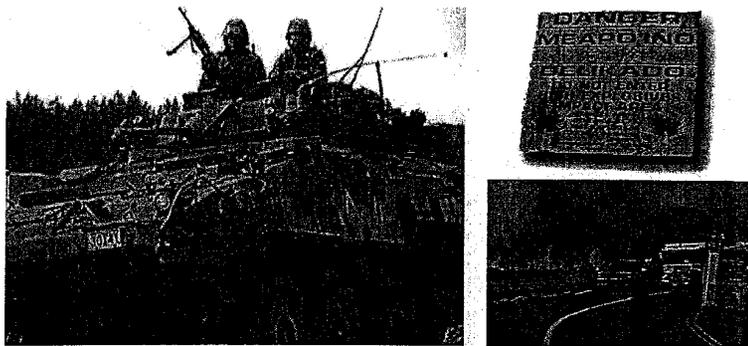
We thank you for your comment and participation in this public process. Your comment has been considered and has been included as part of the administrative record for this process. For any land purchased by the Army in support of this project, appropriate compensation will be provided to landowners at fair market value. The Army also proposes to mitigate significant impacts resulting from this project (see Chapters 4-8 of the EIS).

Responses

Comments



Comments

STOP THE STRYKER INVASION

The Army wants to station a Stryker Brigade in Hawai'i - 291 20-ton armored attack vehicles. They will seize up to 24,400 acres of land, damage cultural sites, kill endangered species, generate thousands of tons of dust, and contaminate our 'āina and threaten our health with bombs and hazardous chemicals. This would be the largest Army expansion in Hawai'i since World War II. The Army has released a draft environmental impact statement for the Stryker Brigade expansion and is taking questions and comments.

1. **PROTEST:** Attend one or more of the following public meeting to protest and testify against Army expansion. Demand that local, state and federal elected politicians oppose the Stryker invasion. Write letters to the editor in local newspapers, and call in to radio talk shows.
2. **TESTIFY:** Submit written questions and comments to: Cindy Barger, US Army Corps of Engineers - Honolulu, Bldg 230, Rm 306, ATTN: CEPOH-PP-E, Ft Shafter, HI 96858-5440. Tel: (808) 438-4812; Fax: (808) 438-7801; Email: SBCT_EIS@poh01.usace.army.mil. You can read the draft environmental impact statement on the website: www.sbtetis.com. Deadline for comments is November 18, 2003, but we urge everyone to demand that the comment period be extended to at least 90 days.

RALLY at EACH site at 5:30 - 6:45 pm. ATTEND the PUBLIC MEETINGS at 7:00 pm:

- | | |
|---------------------|---|
| 28 Oct. 2003 | Honolulu Country Club, 1690 Ala Pu'umalu St., Salt Lake |
| 29 Oct. 2003 | Helemanō Plantation, 64-1510 Kamehameha Hwy., Wahiawā |
| 30 Oct. 2003 | Makaha Resort Golf Club, 84-626 Makaha Valley Rd., Wai'anae |
| 04 Nov. 2003 | Turtle Bay Resort, 57-091 Kamehameha Hwy., Kahuku |
| 05 Nov. 2003 | Waikōloa Beach Marriott, 69-275 Waikōloa Beach Dr., Waikōloa |
| 06 Nov. 2003 | Hilo Hawaiian Hotel, 71 Banyan Dr., Hilo |

For more information and to get involved contact DMZ-Hawai'i / Aloha 'Āina c/o AFSC Hawai'i, (808) 988-6266 (O'ahu); Malu 'Āina, (808) 966-7622 (Hawai'i). Visit www.afschawaii.org and follow the demilitarization link.

STOP THE MILITARY LAND GRAB! CLEAN UP, NOT BUILD UP!

Responses

Comments



BOZEMAN, MONTANA DENVER, COLORADO HONOLULU
JUNEAU, ALASKA NEW ORLEANS, LOUISIANA SAN FRANCISCO, CA
SEATTLE, WASHINGTON TALLAHASSEE, FLORIDA WASHINGTON
ENVIRONMENTAL LAW CLINIC AT UNIVERSITY OF
ENVIRONMENTAL LAW CLINIC AT STANFORD UP

December 31, 2003

By U.S. Mail and Facsimile Transmission

Cindy Barger
U.S. Army Engineer District, Honolulu
Programs and Project Management Division
Building 230
CEPOH-PP-E
Fort Shafter, HI 96858-5440
Fax No.: (808) 438-7801

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

Dear Ms. Barger:

I submit these comments on behalf of Earthjustice, in response to the U.S. Army's
request for public input on the draft environmental impact statement ("DEIS") for the
transformation of the 2nd Brigade, 25th Infantry Division (L) to a Stryker Brigade Combat
Team in Hawai'i.

N10-1

These comments necessarily will be brief because, frankly, the Army has failed to
provide the public with adequate time to wade through the approximately 1500 pages
of the DEIS' three volumes. Extending the comment period for 45 days from November
19, 2003, to January 3, 2004, did little to help the public comment thoughtfully on this
massive and dense document. The DEIS is approximately five times the maximum
length that the Army's regulations implementing the National Environmental Policy
Act ("NEPA") state an EIS for a complex project should be, meriting a public comment
period at least five times the minimum 45-day comment period required under the
Army's regulations. See 32 C.F.R. § 651.40(b); id. § 651.45(e). Moreover, it is common
knowledge that the period between Thanksgiving and New Year's is not the ideal time
to seek considered input from anyone. If the Army truly wished to hear from the
people of Hawai'i regarding their concerns about the potential environmental impacts
associated with this project, it would have given them more time.

N10-2

Given the limited time to review the DEIS, we will focus our comments on two
fundamental points. First, this DEIS fails completely to provide an adequate
alternatives analysis, which courts have repeatedly declared is at the heart of the NEPA
process. The DEIS clearly started from the assumption that transformation to a Stryker
Brigade must happen here in Hawai'i, dismissing out-of-hand all alternatives that

Responses

N10-1

The public comment period was extended to 90 days and ended on January 3,
2004. According to NEPA regulations, the main text of a Final EIS should
normally be no longer than 300 pages for proposals of unusual scope or
complexity (40 CFR 1502.7). In practice, this recommended page limit is
typically exceeded. The main text of this SBCT document is well over the
suggested 300 pages in length, but the scope of the proposal, involving twenty-
eight projects, acquisition of over 24,000 acres of land on two Hawaiian
islands, and the comprehensive and complex evaluation of a multitude of
resource impacts on the affected environment on O'ahu and Hawai'i
necessitates an impact statement of this magnitude. For reviewers not electing
to read the entire main text, an Executive Summary provides a comprehensive
impact evaluation overview, including a mitigation matrix. Regarding time for
EIS review, this is a large, comprehensive document requiring considerable
time to thoroughly review. In view of this, the 45-day minimum comment
period for draft environmental impact statements required by NEPA was
extended to 90 days. Three months was considered an adequate period of
time to review the document and provide written comments.

Comments

Earthjustice Comments on Transformation DEIS
December 31, 2003
Page 2

**N10-2
cont'd**

involve transformation elsewhere. See, e.g., DEIS at 2-45 to -46. That is completely inappropriate and unlawful. Neither the Army's programmatic EIS nor this DEIS compare the environmental impacts of transformation in Hawai'i versus the environmental impacts of transforming elsewhere. This renders the Army's NEPA process fundamentally flawed. The only way to remedy this defect is to prepare a new draft EIS for public review that contains a real alternatives analysis.

N10-3

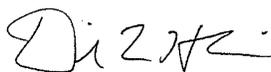
Second, it appears that, without waiting for the end of the public comment period, much less a final EIS, the Army has already committed itself to fielding a Stryker Brigade Combat Team in Hawai'i. Attached hereto is a Pentagon news release to that effect, dated December 17, 2003. This puts the cart before the horse. An EIS is supposed to "[s]erve as a means to assess environmental impacts of proposed military actions, rather than justifying decisions" already made. 32 C.F.R. Part 651, app. E, § (a)(4). Moreover, by announcing its decision in the middle of the public comment period, the Army has undoubtedly discouraged many Hawai'i residents concerned about transformation from submitting comments since, at this point, transformation is generally viewed as a done deal.

N10-4

I have attached a corrected version of the transcript of the comments I offered at the October 30, 2003 public hearing on the DEIS. Fortuitously, I happened upon the transcript while looking for your address on the DEIS website earlier today. I had not previously received any notification from the Army either that the transcript was available for review or that there is a January 9, 2004 deadline for making corrections thereto. The Army would do well to notify the public of such matters, especially if it expects people to submit corrections by a deadline.

Please feel free to contact me if you would like to discuss our concerns or if you have difficulty reading the corrections to my testimony.

Sincerely,



David L. Henkin
Staff Attorney

Responses

N10-2

As discussed in Section 1.6 of the FEIS, the ROD for the Programmatic EIS directed the 2nd Brigade, 25th Infantry Division (Light) at Schofield Barracks, Hawai'i to transform to an SBCT. The Commanding General of the 25th ID (L) is charged with deciding how best to achieve that directive and provide for military training, readiness, and facility requirements to meet SBCT transformation needs, while enabling the current forces to continue carrying out their missions and giving due consideration to environmental factors. This decision will be based on the results of this EIS, and on consideration of all relevant factors including mission, cost, technical factors, and environmental considerations. This EIS considers a reasonable range of alternatives including several alternatives that involve transforming and/or training on the U.S. mainland. As discussed in Section 2.6, the mainland alternatives were not analyzed in detail because they did not meet the purpose and need of the proposed action. (Complete details on the proposed action are presented in Chapter 2 and Appendix D.)

N10-3

Although Department of Defense, Department of the Army, and Congressional representatives have issued statements that the 2d Brigade, 25th ID(L) will transform to a Stryker Brigade, these statements refer to programmatic level decisions necessary to continue the planning, funding and assessment processes for the proposed transformation efforts and set the conditions for implementing an action once a final decision has been made. The final decision on whether the 2d Brigade, 25th ID (L) will transform to an SBCT will be made by the appropriate local commander, subject to environmental assessment and other appropriate reviews and compliance with applicable federal law.

N10-4

The suggested changes have been made to the transcript as requested.

Comments

Responses

DOD News: Additional Stryker Brigade Acquisitions Approved/etenseLINK template Page 1 of 1



United States Department of Defense

News Release

On the web: <http://www.dod.mil/cgi-bin/diprint.cgi?>

<http://www.dod.mil/releases/2003/nr20031217-0790.html>

Media contact: +1 (703) 697-5131

Public contact: <http://www.dod.mil/faq/comment.html> or +1 (703) 428-0711

IMMEDIATE RELEASE

No. 959-0
December 17, 2003

ADDITIONAL STRYKER BRIGADE ACQUISITIONS APPROVED

The Department of Defense approved plans for the Army to field six Stryker Brigade Combat Teams (SBCT). Secretary of Defense Donald Rumsfeld approved an Army enhancement plan on Dec. 8 that provides for the acquisition of Stryker Brigade Combat Teams (SBCT) 5 and 6. The Army's plan focused on enhancing the aviation, fire support, network, and sensor capability of SBCTs 5 and 6, and retrofitting brigades 1 through 4 with newer technology as it becomes available. The approval gives the Army permission to begin expending funds for the new brigades' acquisition and fielding.

Rumsfeld directed the Army to prepare the plan in a Dec. 2002. The memorandum approved SBCTs 1 through 4, but directed further study of SBCTs 5 and 6 before the Army would receive final approval to field them.

Additionally, the plan reviewed basing options for the brigades and the desirability of associating Stryker brigades with Air Force aerial expeditionary forces to facilitate development of joint doctrine, training, and deployment.

The fifth SBCT, scheduled for fielding in 2006, will be in the 2d Brigade, 25th Infantry Division (Light) at Schofield Barracks, Hawaii. The sixth SBCT, scheduled for fielding from 2008 - 2010, will be the 56th Brigade (Mechanized), 28th Infantry Division (Mechanized), of the Pennsylvania Army National Guard.

<http://www.dod.mil/releases/2003/nr20031217-0790.html>

May 2004

Stryker Brigade Combat Team Final EIS, Hawaii

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Appendix P. Comments and Responses

Comments

Responses

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1 MR. DAVID HENKIN: Aloha kakou.
2 AUDIENCE: Aloha.
3 MR. DAVID HENKIN: My name is David Henkin.
4 I'm an attorney with Earth Justice. And I appreciate so
5 many people sticking around so long. I figured I'd go
6 towards the back because unlike the other speakers
7 tonight, I'm not from this part of the island, therefore
8 I do not have any -- I can't speak ^{as} ~~from~~ somebody from
9 this part of island.
10 But I can speak as a resident of Hawai'i
11 and someone who is very concerned with the proposals that
12 the military is currently putting out.
13 Because of my legal background I'd
14 primarily like to focus on some of the legal deficiencies
15 of the draft EIS because sometimes through public comment
16 there is a lack of -- or at least agencies sometimes say
17 they don't really know what you're referring to. They
18 don't quite get the point.
19 I'll be primarily referring to the
20 Department of Defense Department of Army's Environmental
21 Analysis of Army Actions Regulations at 32 CFR part 651.
22 But first I'd like to do something just to
23 give you a flavor of this EIS. I picked a random page of
24 acronyms just to give a flavor of what going through this
25 volume is like. I'll just read one of the pages:

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Comments

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1 "I3A, IAF, IA^{R11}, ~~RAF, IF~~, IAV, IBCT, ICM,
 2 ICRMP, IDG, IDP, IFR, Initial ~~Backs~~^{Backs}, INRAN, IOC, anyway,

3 you get the idea. It's extremely dense reading. I'd like

4 to refer to appendix E to part 150 -- or 651. ^{of the Army's NEPA}

5 And it says that the "likely environmental ^{regulations.}

6 impacts need to be written in simple, non-technical

7 language for the lay reader." This document fails

8 miserably on that account, which is why we would support

9 the requests that have been made for additional time for

10 people to go through this document.

11 Those of us who were around in April of

12 last year when the scoping process was happening, this is

13 like deja vu all over again. That was another instance in

14 which the Army took a look at its regulations and saw it

15 had a minimum period of time that must be provided for

16 scoping ^{and if why} that [^] was initially offered to the public.

17 It took a lot of community sticking

18 together to insist on more time. And more time was

19 eventually given. That same type of penny wise, pound

20 foolish approach has been taken here. You have a [^] massive

21 document.

22 I do think it has to be more than the 300

23 pages that the regulations provide for complex projects

24 because never before in this state have we seen a

25 proposal, such a large proposal for an increased military

Comments

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1 presence presented to the public for consideration.

2 So I don't think it can be made any
3 shorter. In fact, in many respects, I think in order to
4 respond to the concerns and some of the issues raised it
5 needs to be longer.

6 But given the impossibility of making it
7 shorter, given the impossibility of making it more
8 incomprehensible because maybe I've been doing this too
9 long working with the military, after a while other than
10 the acronyms, if they actually spelled out, everything out
11 in full this thing would be six times as long. So maybe
12 there do need to be all these acronyms. Maybe it does
13 need to be this long.

14 Being five times longer than what a complex
15 EIS is supposed to be, written in military acronym speak
16 it's absolutely impossible to expect anyone to provide
17 rational commentary on this in the time provided.

18 I don't think ^{the} 120 days that OHA has
19 requested is generous to the military. ~~And~~ a longer
20 period of time would be appropriate. = much

21 In fact, switching to another point here,
22 this document is a good starting place for the discussion
23 but it is not adequate as a draft Environmental Impact
24 Statement.

25 The most telling problem with the document

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Responses

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1 is the complete lack of adequate alternatives analysis.
2 I'd like to turn back the clock because some of the people
3 here -- in fact most of the community here was with us
4 back in April 2002 at the scoping session.

5 We all sat through, I believe, about a four
6 hour scoping session to try and educate the Army regarding
7 the concerns the community has that this proposal raised
8 up.

9 And quoting again from your regulations
10 having to do with scoping -- this is Section 651.50D. I'm
11 sorry. That was not the section I wanted to refer to.

12 ~~601-432-2~~ "Proper scoping identifies reasonable
13 alternatives and the information needed for their
14 evaluation." I'll emphasize this last point. "Thereby
15 increasing public confidence in the Army decision-making
16 process."

17 In other words, the reason why we sat
18 through four hours of discussion during the scoping
19 sessions, was, among other things, to identify a range of
20 alternatives, reasonable range of alternative that the
21 Army should consider.

22 William Aila and others have emphasized --
23 I would just refer the Army back -- there was a court
24 reporter present -- there was a transcript. And speaker
25 after speaker emphasized the need to think a little bit.

6/7/04 (b)(2):

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1 outside the box.

2 If we're going to be completely retooling

3 one of three brigades of this division -- if we are going

4 to be spending -- and the numbers I've heard range from

5 half a billion to 1 and a half billion dollars -- but any

6 ~~an~~ event, a substantial amount of money to create a new

7 fighting force, then you have to think about whether

8 forward deployment of this brigade in Hawai'i makes any

9 sense in an era where we no longer send our troops to the

10 battlefield by ship.

11 Yes, maybe it made sense at one point that

12 this really was a forward deployment. But we have one of

13 brigades on the mainland in Washington, Washington State

14 that is.

15 Presumably they're going to be able to get

16 to the battlefield the way that these troops will get to

17 the battlefield which is by airplane.

18 The testimony that was offered at the

19 scoping session last April was, if you want to move troops

20 safely to the battlefield, do you want to fly them in an

21 airplane over open ocean until they hit Asia?

22 Or do you want them to fly from Washington

23 State over our allies in Canada, to Alaska, over to our

24 Asian allies in Northwestern Asia -- Northeastern Asia,

25 excuse me.

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May 2004

Stryker Brigade Combat Team Final EIS, Hawai'i

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Appendix P. Comments and Responses

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1 It's that type of analysis that's
2 completely lacking from this document. If you take a look
3 at the executive summary -- and many people, frankly,
4 aren't going to make it out of the executive summary -- it
5 talks about alternatives analyzed and it gives a statement
6 that's fairly accurate.

7 It says, "The alternatives analyzed must
8 reasonably meet the purpose of the need for the action.
9 Alternatives must also be practical and feasible. That is
10 they must be capable of being implemented by the Army or
11 another agency, be technically feasible and not require a
12 commitment of resources they cannot practically be
13 obtained." All of that is accurate and fair.

14 What do we get in terms of a document? We
15 get "doing nothing" which I think all of us can agree the
16 Army is unlikely to conclude that's what it should do.

17 "Doing the preferred alternative" which is
18 the full-blown transformation with all the land
19 acquisition.

20 And "doing that, minus a little bit."
21 Those are the alternatives that are given. This is a
22 fatally flawed document because it does not -- it does not
23 analyze a reasonable range of alternatives.

24 One of the major purposes of an
25 Environmental Impact Statement -- and I'm referring again

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1 to appendix E of your regulations, ^{(a)(4)} 4. It says "EIS's
2 will serve as a means to assess environmental impacts of
3 proposed military actions rather than justifying
4 decisions."

5 Unfortunately, what we seem to have here is
6 the cart before the horse, a decision to do the
7 transformation in Hawai'i and then a document generated to
8 justify that decision. And that is simply not the way
9 that it's supposed to be done.

10 What you need to do is look at all
11 reasonable alternatives for accomplishing your goal. And
12 if you've determined that transformation through Stryker
13 Brigades is the goal and what you want to do, you actually
14 do need to do the hard work of considering your
15 alternatives. Different brigades in different locations
16 and what the relative ^e advantages and disadvantages are.

17 If it's not in your programmatic EIS and if
18 it's not in this EIS, the question, quite simply, is where
19 is it?

20 NEPA requires nothing less than that
21 analysis so that you can make a decision based on all the
22 information rather than merely ratify a preordained
23 conclusion.

24 Now, this morning I read in the paper
25 something really disturbing. It had to do with the

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1 arrests. And an Army spokesperson -- I forget who it
2 was -- responded to a media inquiry about the arrests and
3 they said, "Well, these ~~troublemakers~~ basically represent
4 a vocal minority. The silent majority of people in
5 Hawai'i support the transformation."

6 Now, this was a shocking statement to me
7 because I thought the purpose of the public comment period
8 of the draft EIS was to solicit public input so that you
9 would know what we all thought about it and what our
10 concerns were with it, about it.

11 Apparently you've already come to the
12 conclusion this is what we all want. And, again, one is
13 left asking the question, is this all a show? Is this all
14 a sham?

15 I hope it's not. You've had a lot of
16 people taking time out of their lives, staying late in the
17 evening on a worknight when they have families at home
18 waiting for them to return.

19 You owe us nothing less than a full
20 alternatives analysis. You owe us nothing less than an
21 adequate opportunity to provide feedback on the draft EIS.

22 Now, given the total lack of alternatives
23 analysis in this document, it would do a disservice to the
24 process and it would undermine the basic values of the
25 National Environmental Policy Act to go from this document

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May 2004

Stryker Brigade Combat Team Final EIS, Hawai'i

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Appendix P. Comments and Responses

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1 to a final. But, fortunately, we have right here in this
2 community examples of situations where the Army, I think
3 quite appropriately, has recognized the deficiency of ~~the~~ ^{its}
4 NEPA documents and has gone back, taken another crack at
5 it. That's with the Makua documents which ended up in
6 court.

7 But what you really need to do is take
8 public comment on this and use this as an expanded scoping
9 period.

10 Because, again, if you'll go back to the
11 critique that I offered back in April 2002, during the
12 scoping process, we didn't have adequate information to
13 provide feedback on what you were proposing because it was
14 one huge black box.

15 At the time that we held those meetings we
16 had no idea precisely what you were proposing to do at
17 all. You failed completely to fulfill the minimum
18 requirements of your regulations Section ~~651-40~~ ^{651.50} where you
19 had to tell us really what you were thinking about doing.

20 Well, finally, in this document I feel that
21 we have a better sense of what you'd like to do. This now
22 provides a spring board for people to be able to provide
23 informed comments on what those concerns they have about
24 what really you propose to do.

25 It may have taken 18 months to actually

Comments

Responses

1 come up with that information which we were entitled to
2 back in 2002. But we're talking about a total overhaul, a
3 total transformation of the military as a fighting
4 machine. Perhaps that will take a little extra time.

5 But I would respectfully submit ~~it~~ ^{that} ~~is~~ ^{the Army} ~~not~~ ^{need} ~~be~~
6 go completely back to the drawing board. But to truly
7 look back at the scoping comments that were given to you a
8 year and a half ago, analyze those alternatives, use this
9 time as an opportunity for people to point out some of the
10 gaps in analysis in this draft and come back with
11 something that really tells us what the alternatives are,
12 really tells us what the impacts are so that, hopefully,
13 you can make an informed decision based on public input,
14 and feedback rather than simply ratifying a decision that
15 you've made and expect us to just sort of play along with
16 the game.

17 I thank you for your time. And I hope to
18 have an opportunity to talk on a true draft EIS.
19 (Applause).

20 MR. CHANG: Thank you, Mr. Henkin. You
21 guys were counting. I did not miscount. But since I
22 mentioned that, there were a few -- there are a couple
23 more people who would like to provide testimony. So next
24 we have Vince Dodge followed by Andrew Cabebe.

25 MR. VINCE DODGE: Aloha kakou.

Comments

Responses

THE ESTATE OF JAMES CAMPBELL

Letter
N11

October 22, 2003

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

Dear Ms. Barger:

Comments Re Draft EIS Transformation of the Second Brigade ("Draft EIS")

We are pleased to offer these comments on the Draft EIS.

Overall, we are very supportive of the Army's efforts to improve its ability to respond quickly and efficiently and we appreciate the effort that went into the Draft. We are also grateful for your continuing efforts with our tenants, most notably the Nature Conservancy, in resolving any remaining issues.

N11-1

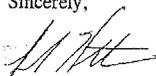
Specifically, we support the Army's preferred alternative regarding the 1400-acre South Range land acquisition. The addition of these lands appears to be an important feature of the transformation process on Oahu. Likewise, we support your plans to expand use of the Kahuku Training area.

N11-2

We have reviewed your efforts aimed at assessing the potential impact of the transformation process and your suggested mitigation measures. Given your conclusion that the transformation process will impact the environment, responsible mitigation of those impacts is very important to us. We look forward to your implementation of the proposed mitigation measures and ask that you carefully review, monitor, and revise the measures periodically, when necessary.

Thank you very much for your consideration. Please contact me directly at 674-3232 should you have any questions or require further information about our comments.

Sincerely,



Bert L. Hatton
Manager, Agriculture/
Natural Resources

N11-1

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.

N11-2

Mitigation measures likely to occur are outlined in the Executive Summary. These proposed mitigation measures were included for public comment. The Army reviewed the measures based on public comments and the benefits of each measure to reduce impacts. The Army has listed those mitigation measures that are high priority and those that are unlikely to occur because of limited resource, unfeasible or there are similar measures already in place. The ROD will indicate which mitigation measures will be implemented.

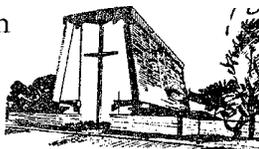
Comments

Letter
N12



Harris United Methodist Church

20 South Vineyard Boulevard
Honolulu, Hawaii 96813-2317
Ph: (808) 536-9602
Fax: (808) 536-9604



IN MINISTRY SINCE 1888

December 29, 2003

Cindy Barger
U.S. Army Corps of Engineers - Honolulu
Bldg. 230, Room 306
Fort Shafter, HI 96858-5440

ATTN: CEPOH-PP-E

Dear Ms. Barger:

The Commission on Church and Society (Commission) of Harris United Methodist Church is grateful for the opportunity to provide testimony on the Army Draft Environmental Impact Statement for the Stryker Brigade in Hawai'i. We have read information about the experimental 20-ton armored combat vehicle, called the Stryker, and the potential impact - environmental, human, and cultural - which 296 of them being stationed and used for training in Hawai'i would have.

N12-1

The Commission opposes the stationing of a Stryker Brigade in Hawai'i. Especially here on O'ahu, we are very aware of how much land is already off-limits to island residents and used exclusively for U.S. military and their personnel. **We find it troubling that the U.S. Army intends to expand its land use to include some 25,663 acres on the islands of O'ahu and Hawai'i,** lands which are now safe for living creatures, while returning the island of Kaho'olawe, which had been used for military training, much of which remains unsafe for humans to even traverse. Live-fire training at Makua, Kahuku, and Pohakuloa will only exacerbate existing damage. An island eco-system is uniquely interdependent, therefore, taking away significant number of acres, not for preservation or conservation purposes, will definitely affect the quality of life of island residents and other life forms.

As United Methodists we are guided by the Social Principles of The United Methodist Church, a denomination of some 9,000,000 members. Paragraph 165C of these Social Principles state that *"We believe war is incompatible with the teachings and example of Christ. We therefore reject war as a usual instrument of national foreign policy and insist that the first moral duty of all nations is to resolve by peaceful means every dispute that arises between or among them, that human values must outweigh military claims as governments determine their priorities, that the militarization of society must be challenged and stopped, that the manufacture, sale and deployment of armaments must be reduced and controlled and that the production, possession, or use of nuclear weapons be condemned. Consequently, we endorse general and complete disarmament under strict and effective international control."*

As Christians, our greatest commandment is to love God and love our neighbors as ourselves. While we support our chaplains who are present to minister to the needs of those who are in the Armed Services, we nonetheless are guided by our belief that it is mutual respect and concern for justice rather than war-making which will bring the peace that all humankind longs for. Thank you for this opportunity to express our thoughts.

Respectfully,

Delores Glover, chair
for the Church & Society Commission

Responses

N12-1

We share and understand your concern on this issue. Our soldiers and their families live and work on our installations. As summarized in Section 4.12, the Army proposes mitigation measures to include UXO clearance activities prior to construction and during training activities to reduce the overall UXO accumulation and potential risk to human health and safety through the life of the project. This issue has the highest level of attention at the Department of Army and it is addressed by a centrally managed program that involves the identification, investigation, evaluation, and, if needed, remediation of potential sites. This program, called the Installation Restoration Program, is coordinated with the state and the US EPA to insure compliance with all laws and regulations. It is not, however, possible to estimate cost or time required related to a specific site until the evaluation phase has been completed. The Army is committed to cleaning up existing sites in accordance with applicable laws regulations. In addition, if the Army chooses to relinquish ownership of the land as a result of a Base Realignment and Closure (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.

Comments

- Earth Justice and the Sierra Club is seeking an extension.

5. DRAFT EIS DISCUSSION:

Comments recorded below were random and not in any particular priority.

- N13-2** | • HCC: Cultural Landscape is hinted but meaningful descriptive language is missing.
- PTA: "Cultural landscape information not complete; Programmatic Agreement (PA) will enhance greater meaning of the landscape (native traditions, folklore, land history)...the PA is seen as a dynamic on-going dialogue."
- N13-3** | • HCC: Hawaii Island Burial Council, a concurring body re PTA project, is not listed in the draft PA on page 2.
- HCC: Cultural Landscapes – these intangibles are very important and should be included in the final EIS document (traditional / cultural properties).
- N13-4** | • PTA: "Cultural landscape material received from public meetings and cultural resources. The material was considered lengthy. The military decided to edit for "brevity" purposes.
- HCC: All agreed strongly the edited material must be re-inserted into the final EIS document!
- N13-5** | • HCC: Hawaiian culture is not uniform. Hawaii Island is unique to its properties / history/ lore's.
- HCC: Impact statements should indicate how it affects the Hawaiian cultural resources.
- N13-6** | • HCC: DEIS page 8-52, "Additional Mitigation 1: "Use of synthetic dust chemicals...what impact will this have on Hawaiian fauna?"
- PTA: "A record of spraying an area is documented and filed. All unusual situations are also documented."
 - OHA:
 - "There should be more alternatives for a project of this magnitude".
 - Mitigation's listed, as "possibilities" should be stated for clarification.
 - There is a lack of cumulative impact statements. OHA can provide case law (history) to Dr. Lucking
- N13-7** | • HCC: DEIS page 8-165 lists site#19528 as a "Transportation Trail".
- HCC suggest this be listed as the *Na Ohule Elua Trail*. HCC wants this trail accessible to Hawaiians.
 - PTA states that portions of the trail are non-distinguishable in the field as well as from arial reconnaissance.
- N13-8** | • HCC: DEIS page 8-16: "Continue current public access policies and procedures from 2002 to 2006...". What happens after year 2006?"
- PTA: "There is a five year review and evaluation period to determine continuity of policy"
 - HCC: EIS should have a footnote for clarification.
- N13-9** | • HCC: DEIS does not specifically state who is the final authority for project.
- PTA: "The Record of Decision (ROD) constitutes *accountability*."
- N13-10** | • HCC: How does PTA deal with underground resources?
- PTA: " PTA activities (maneuver zones) avoid lava tubes and blisters.
- N13-11** | • HCC: The UXO contractor should meet with the impacted communities to educate / orient them on the process as well as safety precautions. Local resources may also assist uxo contractor with local knowledge of terrain/ terrain history.
- N13-12** | • HCC: Cultural background for place names eliminated from the DEIS. Reinstate this information! In this regard, it is important to be careful of Hawaiian name spellings. A misspelled word or phrase could alter the intended meaning.
- PTA: PTA will host HCC on site visits following the DEIS activity.

Responses

N13-3

The Hawai'i Island Burial Council is listed in the Final PA.

N13-4

Tables found in IARII's report that include a large amount of this information will be included in the Cultural Resources Appendix.

N13-5

The analysis of Native Hawaiian culture for each specific region is derived from individuals or groups specific to that region.

N13-6

Additional discussion of dust control chemicals has been added to Sections 5.5 and 8.5 of the Final EIS. The recommended dust control chemicals (calcium chloride and/or magnesium chloride) are considered virtually non-toxic. Toxic concentrations for these salts are similar to those for common table salt. Only direct spills of the concentrated chloride solutions would pose any environmental risks. The maritime climate of Hawai'i creates a high natural exposure to chloride salts, suggesting that most native vegetation and fauna have a reasonable tolerance for exposure to chloride salts. The dust control chemicals would be applied directly to road and parking lot surfaces that do not support vegetation growth.

N13-7

This change has been made. The Army will take the access request into consideration.

N13-8

The text has been revised.

N13-9

Chapter 1 has been updated to reflect the final decision process for the EIS. Following completion of the Final EIS, the U.S. Department of the Army (DA) will select an alternative from those proposed in the Final EIS. Under the National Environmental Policy Act (NEPA), that decision does not become final until the DA certifies the Record of Decision (ROD) on the Final EIS. The ROD certifies the adequacy of the project's environmental review process and itemizes the Army's commitments to mitigate project impacts. Issuance of the ROD is a prerequisite to execution of federal funding for project construction. The ROD is anticipated in June 2004.

Comments

N13-13

- HCC: Group feels it needs another meeting to cover issues yet discussed.
- PTA: Agree to reconvene on Monday, October 27 at 09:00 at PTA.
- PTA: Will convene the community meeting in the evening of the 27th of October.
 - In preparation for the 10/27meeting , HCC participants are asked to review PA (page 4) "Consultation with Native Hawaiians." In addition, DEIS page 3-3, "Ceded Lands" definition – HCC suggest that language be replaced with the Apology Bill (public law 103150).

EVALUATION OF TODAY'S MEETING

POSITIVE

Candid
 Flexible
 Adequate time allotted
 Presenter
 Curtis is o.k!
 Purpose of meeting met
 Great input from OHA

NEED ADJUSTMENTS

Colonel Clarke needs more practice on his Hawaiian Pronunciation beginning with POHAKULOA

Any errors / omissions noted will be corrected at our 10/27 meeting.

Meeting concluded at 2:00pm

Dickie

PS: Col. Clarke, a big mahalo for the pizza lunch and not MREs!

Responses

N13-10

This "comment" is a question that was asked in a public meeting of October 14, 2003, attended by representatives of PTA. Based on the response reported by the commenter, the answer given by the PTA representatives was that "PTA activities (maneuver zones) avoid lava tubes and blisters." This suggests that the comment was more specifically about lava tubes as an underground resource. Text has been added to Section 8.9 discussing lava tubes at PTA.

N13-11

The community outreach plan included members of Cultural groups, Focus groups, Community Support Groups and Public Sessions. This outreach plan ensured a balanced coverage of all concerned community groups both on O'ahu and the Big Island. Moreover, we held two comprehensive scoping meetings and two comprehensive public meetings on the Big Island to ensure the public was aware of our proposals and had various opportunities to be a part of the process and provide input in the form of comments, suggestions and ideas.

N13-12

Tables found in IARIP's report that include a large amount of this information will be included in the Cultural Resources Appendix.

N13-13

We thank you for your comment and your comment has been considered and included into the administrative record for this process. Hawai'i was adopted as a territory of the U.S. Government in 1900 and was granted admission into the Union in 1959 via Pub L 86-3, 73 Stat 4 when the people of Hawai'i petitioned the U.S. Congress for statehood and adopted by vote in the election held on November 7, 1950 the Act of the Territorial Legislature of Hawai'i entitled "An Act to provide for a constitutional convention, the adoption of a State constitution, and the forwarding of the same to the Congress of the United States, and appropriating money therefore", approved May 20, 1949 (Act 334, Session Laws of Hawai'i, 1949). We understand that some individuals do not agree with or support the formal annexation of Hawai'i in 1898. However, issues of statehood and Hawaiian Sovereignty are outside of the scope of the NEPA process.

Comments

Responses

Letter
N14



**HAWAII
ISLAND
Economic
Development
Board**

November 5, 2003

US ARMY CORPS OF ENGINEERS
Honolulu Engineer District, Building 230
Ft. Shafter, Honolulu, Hawaii 96858

PMB-281
200 Kanoolehua Avenue
Hilo, Hawaii 96720-4648
Ph: (808) 968-5418
Fax: (808) 968-5792
e-mail: hiedb@verizon.net
website: www.hiedb.org

Re: ARMY TRANSFORMATION TO A STRYKER BRIGADE COMBAT TEAM IN HAWAII
Public Hearing Thursday, Nov. 6, Hilo Hawaiian Hotel, 5:30PM/7:00PM meeting

To Whom It May Concern:

My name is Paula Helfrich and I am President of the Hawaii Island Economic Development Board.

HIEDB has participated in numerous public dialogues and hearings on Saddle Road realignment and the Mauna Kea Science Reserve since 1994. Both issues involve cultural and environmental matters discussed in the referenced draft EIS under consideration for the Pohakuloa Training Area.

In general, HIEDB has supported the US Army's training and readiness mission at PTA, and found them to be good neighbors. The Army Environmental Center at PTA has established an excellent track record in identifying and protecting the area's natural resources and endangered species. In recent years, expanded fire controls and rescue crews have provided important public safety services. We applaud the mention of establishing a Mauna Kea Environmental Center for public education as part of the draft EIS, and recent designation of a community partnership for the area. We note that the actual construction projects under consideration for this EIS at Pohakuloa are limited to a realignment of the existing tank trail, two ranges and five modest projects such as an aircraft parking apron at Bradshaw Air Field, a wash rack and a consolidated control building. A proposed land acquisition is also discussed, either as a purchase or continued lease arrangement. In terms of socio-economic impact, these are relatively minor projects as noted in Appendix L as an EIFS model, and under Table 9-2 (14) Cumulative Projects on Hawaii.

The complexity and breadth of this draft EIS covers a much larger scope, far beyond impacts at the Pohakuloa Training Area. HIEDB's comments are related only to the PTA components of this draft EIS. As such, we have found it extremely difficult to evaluate the relatively minor socio-economic impact noted against anticipated costs in environmental and/or cultural impact.

N14-1

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.

N14-2

Project-specific costs relating to Army expenses on construction, mitigation, and O&M are not generally discussed in NEPA documents except where such financial issues relate to feasibility.

Comments

Responses

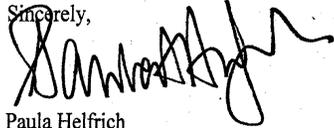
N14-2
cont'd

As has been requested at numerous public hearings (most recently at a meeting with Gen. Jacoby on July 16, 2003), we recommend that the Final EIS document RELATING TO THE POHAKULOA PROJECTS contain specific and quantifiable information on estimated costs of proposed construction, estimates of expanded mitigation costs, annual operations estimates for the PTA base operation, any expanded training costs, and especially annual maintenance and operations cost estimates for mitigation, environmental control and cultural preservation in the PTA site.

We believe that a great deal of misunderstanding may have been inadvertently fostered by a tendency to overstatement during the technical development of the EIS procedure. In any event we need to focus on impact, challenge and opportunities on Hawaii Island.

We look forward to reviewing this information. Thank you for your consideration of these comments.

Sincerely,



Paula Helfrich
President

Comments

November 12, 2003



Letter
N15

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, HI 96858-5440

Dear Ms. Barger:

**Re: Army Transformation to a
Stryker Brigade Combat Team in Hawaii**

N15-1

Thank you for the opportunity to comment on the October 2003 draft EIS of the Army Transformation to a Stryker Brigade Combat Team in Hawaii. HECO contacted Clifford Takano and Lynette Kwock of the USACE, Fort Shafter on October 31, 2003 to discuss the impact of the proposed Stryker Brigade Motor Pool at Schofield. As a result of that discussion, relocation of the existing 46kv line (Wahiawa-Mikilua) will not be requested at this time.

Our point of contact for this project, and the originator of these comments, is Paul Nakagawa (543-7062) Lead Engineer. I suggest that your staff and consultants deal directly with Paul to coordinate HECO's continuing input, especially during the design phase of this project, as there may be other impacts to HECO's facilities that were not identified in the DEIS.

The DEIS has been forwarded to Clyde Nagata, Manager, Engineering Department, Hawaii Electric Light Company. Comments by HELCO on the Pohakuloa Training Center will be submitted shortly.

Sincerely,

Kirk S. Tomita
Senior Environmental Scientist

cc: OEQC
P. Nakagawa

Responses

N15-1

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

November 17, 2003

Responses

Letter N16

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

Gentlemen:

Subject: Transformation To Stryker Brigade Combat Team Draft EIS
Pohakuloa Training Area, Island of Hawaii

Thank you for the opportunity to comment on the subject Draft EIS of October 2003. We will be commenting on Pohakuloa Training Area on the Island of Hawaii and our parent company, Hawaiian Electric Company Inc. will be commenting on the other areas.

We do not have any objections to the proposed Stryker Brigade Combat Team facilities at the Pohakuloa Training Area; however, have the following comments:

- | | |
|--------------|---|
| N16-1 | 1. Section 8.14.2, Page 8-214, Electricity - The unit for energy is Kilowatt-Hours (kWH) thus, "1,498.2 kW" should be "1,498.2 kWH". |
| N16-2 | 2. Section 8.14.2, Page 8-215, Electricity - Similarly, "43.2 kW" and "89.2 kW" should be "43.2 kWH" and "89.2 kWH", respectively. The sentence, "The average daily energy demand of the tactical vehicle wash would be approximately 89.2 kW" should read, "The average daily energy demand of the ammunition storage area would be approximately 89.2 kWH". The average daily energy demand of the tactical vehicle wash was already stated on Page 8-214. |
| N16-3 | 3. Electrical line easements will be required along the P3/P4 Pohakuloa to Kawaihae Trail to provide electrical service to the properties bisected by this roadway. |
| N16-4 | 4. The subject area is currently served by our Pohakuloa 2,500 KVA electrical substation, which has adequate capacity to serve the proposed facilities. The existing dual 12,470-volt circuits from the substation feed a primary switchgear at the Pohakuloa Training Area. |
| N16-5 | 5. Additional 12,470-volt distribution line extensions may be required to serve the proposed facilities along with transformers and other associated secondary equipment. Line easements will be required if these line extensions will be owned and maintained by HELCO. |
| N16-6 | 6. HELCO's current system peak load is 183,500 KW and our total generation system capability is 233,700 KW. Our reserve margin is 27% and has adequate generation to serve the project. In addition, HELCO has been given approval to recommence construction of its Keahole Generation Expansion project, CT4 and CT5. This expansion will add 39,800 KW of generation capacity in 2004. |

N16-1

Change made.

N16-2

Change made.

N16-3

Comment has been considered; Section 8.14.2 has been revised to reflect this new information. The section now includes the following: "Electrical line easements may be required along the PTA Trail to maintain continued electrical service to the properties bisected by this roadway. The Army would consult with HELCO in order to make these arrangements prior to construction."

N16-4

Comment has been considered and added to sections 8.14.1 and 8.14.2.

N16-5

The Army will coordinate with HELCO to provide service to the new facilities.

N16-6

Comment has been considered; Section 8.14.1 has been revised to reflect this new information.

Comments

Responses

SBCT EIS Project Manager
November 17, 2003
Page 2 of 2

N16-7

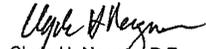
- 7. We strongly recommend that energy efficient and conservation features suitable to reduce the peak electrical demand are part of the development's plans. We recommend that this development take full advantage of waste heat recovery equipment to recycle and reuse the waste heat rejected by air conditioning and refrigeration equipment. If this equipment is incorporated in the development's original design, the amount of energy required will be substantially reduced.

N16-8

- 8. The project consultants and engineers are urged to contact HELCO's Engineering Department as soon as practicable to open a service request to insure timely procurement of long lead equipment.

Should you have any questions, please contact me at (808) 969-0321 or Hal Kamigaki at (808) 969-0322.

Sincerely,



Clyde H. Nagata, P.E.
Manager, Engineering Department

CHN:HK:ln

cc: Kirk Tomita, HECO

N16-7

The EIS has determined that there is no significant impact to public services by the implementation of the proposed action. The Army designs all of its projects, including those in this proposed action, in accordance with Executive Order 13123 "Greening the Government through Efficient Energy Management" (June 2001), Executive Order 13101 "Greening the Government through Waste Prevention, Recycling, and Federal Acquisition" (September 1998), and Department of the Army Engineering Technical Letter 1110-3-491 "Sustainable Design for Military Facilities" (May 2001) and the U.S. Army Corps of Engineers Sustainable Project Rating Tool (SPiRiT). These documents and tools provide design guidelines and standards for sustainable development - addressing water resources, energy and atmospheric resources, indoor environmental quality, material and other resources.

N16-8

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

Cindy
 -----Original Message-----
Letter N17
 From: Philip Hyatt [mailto:kawehi11@msn.com]
 Sent: Monday, January 12, 2004 9:16 AM
 To: Barger, Cindy S
 Subject: Comments To Stryker Brigade In Hawai'i

Aloha,

As President of the Hawaiian Womens Patriotic League and due to the illegal U.S. occupation of our lands and country, the independent Kingdom of Hawai'i it is our duty to address this issue meanwhile, until this issue is politically resolved by the proper authorities. At the bottom of this issue is land. (see: "Hawaiiakingdom.org" for more facts and documented evidences).

N17-1

Land for us is a gift from God and a very sacred place that we get our food from, raise our children on and make decisions according to Hawaiian law on Hawaiian land for everyone to understand that it is not "owned" but to use and that is how it was for thousands of years of evolution. However, it was usurped illegally and due to U.S. occupation the lives of most Hawaiians have been worse off and continues to go down hill.

Our goals are simple. The title to the lands in Hawai'i continue to remain in the Hawaiian Kingdom and secured to the Hawaiian people as it was written in the laws of the Hawaiian Kingdom which states: in Sec. 6, Chapter II, Title 1, Civil Code of the Hawaiian Islands; "The laws are obligtory upon all persons, whether subjects of this Kingdom, or citizens or subjects of any foreign State, while within the limits of this kingdom...The property of all such persons, while such property is within the territorial jurisdiction of this kindom, is also subject to the laws."

We would like to get your comments on our statement in writing.

Me Kealoha Pumehana
 R. Kawehi Kanui

N17-1

We thank you for your comment and your comment has been considered and included into the administrative record for this process. Hawai'i was adopted as a territory of the U.S. Government in 1900 and was granted admission into the Union in 1959 via Pub L 86-3, 73 Stat 4 when the people of Hawai'i petitioned the U.S. Congress for statehood and adopted by vote in the election held on November 7, 1950 the Act of the Territorial Legislature of Hawai'i entitled "An Act to provide for a constitutional convention, the adoption of a State constitution, and the forwarding of the same to the Congress of the United States, and appropriating money therefore", approved May 20, 1949 (Act 334, Session Laws of Hawai'i, 1949). We understand that some individuals do not agree with or support the formal annexation of Hawai'i in 1898. However, issues of statehood and Hawaiian Sovereignty are outside of the scope of the NEPA process.

Comments

Responses

Letter N18 -----Original Message-----
From: Alan Mefford [<mailto:alanhawaii@yahoo.com>]
Sent: Wednesday, November 05, 2003 12:17 PM
To: sbct_eis@poh01.usace.army.mil
Subject: Stryker Training Area

My name is Alan Mefford and I represent Hawaii Offroad Association on the Big Island. This is a statewide association representing the interests of off highway vehicle enthusiasts.

We have the greatest military force in the world today because of it's professionalism and constant training.

These brave, dedicated men and women risk and give their lives to protect our freedom and way of life; more personally, to protect my freedom and way of life. Giving a small piece of our State for the Stryker Force training just doesn't seem like a big deal. You have my full support and thanks for what you do. May God bless you all and keep you safe.

N18-1

Alan Mefford
Hilo, Hawaii
alanhawaii@yahoo.com

N18-1

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 December 31, 2003
N19

RESPONSE TO DRAFT ENVIRONMENTAL IMPACT STATEMENT
ARMY TRANSFORMATION, STRYKER VEHICLES, HAWAII

From: Patricia L. Patterson, Hui Malama o Makua

Second Presentation, First Written, Following Presentation at Makaha Resort

N19-1 A. Even though the Pentagon has approved and Congressman Neill Abercrombie has announced the siting of a Striker Brigade in Hawaii, I strongly believe it should not happen. I also question Abercrombie's assertion that this will result in \$10 million for Hawaii.

Most of that \$10 million will probably go directly to the Mainland developers like Actus Lease and Lease, which got the 50-year contract for military housing rent receipts—with very little "trickle-down" money or permanent, well-paying jobs for Hawaii's civilian residents.

N19-2 B. ES.9.2. Both "short-term" and "long-term" damage to cultural resources in the future are mentioned. Please define "short-term cultural damage". Isn't this the material that should be described in ES.9.3?

N19-3 I do applaud your plan to use solar power. However, you have a long way to go in using natural energy sources. Both Kahuku and Pohakuloa have great proven potential for windpower. Please address that.

N19-4 C. Page ES-50, ES.9.3. This is an inadequate consideration of resources that future generations would not be able to reverse. No reference is made to cultural, archeological damage or to high usage of water and imported oil to make electricity for the primary facilities or for all the extra people, nor of the gasoline, oil and other fluids just to operate and maintain the Stryker.

N19-5 D. Figure D-5. SUBJECT: PRECIOUS WATER. This map shows current one-million-gallon water-storage tanks plus proposed one-million-gallon tank. Already in November 2003, Honolulu Board of Water Supply has announced the need to find additional water resources for the current population of Oahu. We can't live here long, any of us or the fauna and flora if you bring the Stryker Brigade here.

N19-6 Tom Whitehead prepared the "Geology and Water Resources" portion of the DEIS. His schooling includes Arizona and California. What is his experience, if any, that qualifies him to evaluate water resources in Hawaii—and where do I find his detailed report?

N19-7 E. Page ES-52, Table ES-21.10. What are those "synthetic dust control chemicals"? Have they been used at other military installations? What have been the results in ongoing human, plant and animal health?

N19-1

Although Department of Defense, Department of the Army, and Congressional representatives have issued statements that the 2d Brigade, 25th ID(L) will transform to a Stryker Brigade, these statements refer to programmatic level decisions necessary to continue the planning, funding and assessment processes for the proposed transformation efforts and set the conditions for implementing an action once a final decision has been made. The final decision on whether the 2d Brigade, 25th ID (L) will transform to an SBCT will be made by the appropriate local commander, subject to environmental assessment and other appropriate reviews and compliance with applicable federal law. The Department of the Army issued a Programmatic EIS for Army Transformation in 2001, and issued its Record of Decision to implement Army Transformation on April 11, 2002. In that ROD, Lieutenant General David McKiernan confirmed a series of previously announced conversions of 6 brigades to interim brigade combat teams, "subject to appropriate evaluation of potential environmental effects in accordance with the National Environmental Policy Act" (ROD, page 11). The Department of the Army will make a decision whether or not to transform the 2d Brigade, 25th ID(L) in Hawai'i only after a full consideration of all the environmental impacts identified and analyzed under NEPA, weighed equally with considerations of strategic importance, military training and readiness, technical considerations, economic and fiscal considerations, and other considerations mandated by law or policy.

N19-2

Chapters 4.11, 5.11, 6.11, 7.11, 8.11, and 9 discuss the impacts of this project on cultural impacts in greater detail.

N19-3

The Army designs all of its projects, including those in this proposed action, in accordance with Executive Order 13123 "Greening the Government through Efficient Energy Management" (June 2001), Executive Order 13101 "Greening the Government through Waste Prevention, Recycling, and Federal Acquisition" (September 1998), and Department of the Army Engineering Technical Letter 1110-3-491 "Sustainable Design for Military Facilities" (May 2001) and the U.S. Army Corps of Engineers Sustainable Project Rating Tool (SPiRiT). These documents and tools provide design guidelines and standards for sustainable development - addressing water resources, energy and atmospheric resources, indoor environmental quality, material and other resources

Comments

Responses

May 2004

Stryker Brigade Combat Team Final EIS, Hawaii

P-209

N19-8 F. Page ES-24, ES.7.3. Regarding FORT RICHARDSON, ALASKA, a viable alternative to Hawaii. I have lived near Fort Richardson, and every day I went to work in Anchorage. Saying that "only 224 days per year" could training be conducted at Fort Richardson because of "climate limitations" is unrealistic. Training there during bad weather would be more valuable than in Hawaii's climate when potential enemy countries' weather is considered.

N19-9 In addition, the need for 270-days-per-year training for the Strykers is at great odds with the requested "required" number of days for CALFEX (Company live-fire training exercises) in Makua Valley after 9/11/01, which was fewer than thirty.

N19-10 Finally, Page ES-24, ES.7.4, paragraph three (and repeated for USAR in paragraph four) reads, "...if wartime situations required deploying Hawaii's SBCT while training on the continental US, the SBCT forces would need to return to Hawaii for full deployment, making it impossible to meet the 96-hour deployment goal."

Why? I would think the SBCT should be ready to deploy from any training location, having arrived at the training site with everything necessary to fight. As a part of their training, full preparation for deployment worldwide should be planned and carried out. It would be more work but more realistic, too. And more valuable.

N19-11 G. Figure 3-15. PALILA critical habitat on the Big Island. What is/are palila?
Lack of Acronyms: 1. QA/QC. (Quality assurance/quality control? Not everyone has that information.)
2. GIS? (Maybe this is another well known abbreviation—but not to me.)
Page 12-1. Yoshika Evans is a GIS Technician. GIS initials also appear elsewhere, but not in the list of acronyms.
Page 12-3/12-5. Millet Talada's role is listed as GIS Graphics; Chris Roos as Cultural Resources GIS.

N19-12 H. Page 12.4. Land Use/Recreation report was prepared by Belt Collins Associates that include two U.H. degree holders. Why "recreation"? We common civilians make or find our own recreation!

N19-13 Page ES-27, Table ES-5. Land use is determined less than significant on Oahu for the "Reduced Land Acquisition". How do you know that acquisition and use of that land will not affect the water table, which is already insufficient for the needs of this Island.

N19-14 Table 6-18., Page 6-77 lists Monk Seals (which are also at Makua) and Page 6-79 Green Sea Turtles. Surely runoff, noise and other impacts will be significant to them and other sea creatures and the people who enjoy them.

N19-15 **F. WASTE OF PAPER AND ITS RESOURCE**
1. Chapter 13. Distribution list. Save space by eliminating duplicates:
Page 13. "Bramlett, David, Gen. (ret.), Haleiwa; Page 13-25 "Ramlett, Gen. David, Halewa.
Page 13-11 "James Sparky Rodrigues" and Page 13-25 James Sparky Rodrigues, Hui Malama o Makua.

N19-4
Chapters 4.14, 5.14, 6.14, 7.14, 8.14, and 9 discuss the impacts of this project on Public Services and Utilities including impacts on water, fossil fuels, and electricity.

N19-5
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. Section 5.8 addresses impacts to water resources.

N19-6
Mr. Whitehead is a registered geologist and has 14 years experience in preparing impact analysis around the world.

N19-7
The recommended dust control compounds are hygroscopic salts (calcium chloride and/or magnesium chloride) with a long history of safe and effective use for dust control. They have been subjected to comparative testing against other dust control products at Fort Hood, Texas and Fort Sill Oklahoma. Calcium chloride salts were found to be the most effective and longest lasting of all of the dust control products tested at these installations. Calcium chloride and magnesium chloride are considered virtually nontoxic in normal use. Dust control compounds would be applied directly to unpaved roadways and parking areas, and thus would have no effect on areas used by cattle or wildlife.

N19-8
In fact the limitation to maneuver training is during the summer month due to potential damage to the permafrost. Maneuver training is restricted to when the permafrost is covered with a protective layer of snow.

N19-9
The CALFEX requirement for SBCT is 24 days per year depending upon mission requirements. While Makua is not required to meet this training need, if it becomes available some SBCT CALFEX training would likely be conducted there as it would be much more efficient.

Appendix P. Comments and Responses

Comments

Responses

May 2004

Stryker Brigade Combat Team Final EIS, Hawai'i

P-210

N19-15 | Page 13-11 "William and" Aila, Hui Malama o Makua; Page 13-17
cont'd | William Aila, Jr.

2. In view of the many inadequacies—together with corrections and additions—it is clear that the FEIS must contain other than the material in the DEIS. However, in order to save many trees from being sacrificed for the manufacture of paper, DO NOT REPRINT the sections of the DEIS that require no alterations. Paying anywhere near the \$25.00 to send out the FEIS with re-duplicated material is an exorbitant waste of our world's resources and our tax dollars. (For an example, I point you to the three Draft Environmental Assessments for Makua Valley in which the second and third were mostly a repeat of the first.)

N19-16

Appendix O, Page 1-4. If the Wildfire Management Plan has not been updated and revised since the last "controlled" burn at Makua Military Range and environs, it MUST BE. This is another significant reason Makua Valley EIS should be incorporated in this EIS.

N19-17

During the ten years prior to Earthjustice and Malama Makua's lawsuit to force an EIS for Makua, over 270 fires occurred. The Army claimed most of them were naturally occurring. During the 39 months immediately preceding 9/11/01 (while the Army was court-prevented from training) not a single fire occurred.

In the three drafts of the MMR EIS, a voluminous Fire Safe Management Plan was published. However, on two subsequent occasions fires got out of control. In the most recent, in the summer of 2003, over 2,000 acres burned. The Fire Management Plan was not adequate—or was not followed. Both Makua and Kahanahaiki Valleys burned, and the fire went all the way to the Satellite Tracking Station at Kaena Point.

To me, the lack of concern of the Army for the citizens camping along the beaches from Kaneana Cave to Kaena Point was most significant. When the fire became too hot and extensive to handle, all the people connect to the Army left MMR. They did nothing to warn our citizens of the fire danger, neither posting nor advertising the advent of a "controlled bum" nor making any effort to get picnickers, surfers, fishermen, divers or campers off the Coast and past the burn area.

Smoke and fire diminished the sight-distance for drivers to less than 2 feet as the long line of "endangered species"—civilians—tried to make their way to safety on the one ingress/egress road along the Waianae Coast.

The damage to the coral reef and everything, both flora and fauna, in MMR and contiguous thereto is undeniably drastic. The soot clings, the runoff from the denuded soil continues.

N19-18

Page 1-2, 1.2.2. If the goal of the WFMP is no human loss or injuries due to wildfire, remember there are humans other than the military who must be protected as well, even if they are off a military reservation but affected by your wildfires. You say, "Wildfire is the single largest impact made by military activities in the Hawaiian ecosystem." I agree, and I want also to point out that this includes the cultural and environmental damage caused by those fires.

N19-10

Not all training would be conducted in the mainland nor would all of the SBCT forces be training at the same time on the mainland. Much of the support equipment needed for combat would remain on Hawai'i. In order to deploy all troops and equipment would need to deploy together which would require the troops and equipment sent to the mainland for training would have to return to Hawai'i to prepare for full deployment.

N19-11

The palila is a bird found on the Island of Hawai'i that is federally listed as Endangered. A discussion of this species can be found in Section 8.10 of the EIS. These acronyms were added to the list.

N19-12

EISs are prepared by interdisciplinary teams. The reason that recreation was included in the analysis is that this proposal could have impacts on that aspect of the human environment.

N19-13

Selection of the RLA alternative would mean the purchase of 100 acres adjacent to SBMR. Impacts to ground water supply would be the same as those anticipated for the Proposed Action. Please see discussion on Section 5.8.

N19-14

These issues have been considered in the impact analyses for both monk seals and sea turtles. Chapter 6.10 discusses potential impacts from noise and runoff.

N19-15

Some individuals are on the list to receive a personal copy and also representing an agency or organization. We cannot remove names unless the individuals in question ask that their name be removed. Your name has been removed per your request.

N19-16

The Army is required by law to distribute copies of the FEIS to all that requested them. We cannot distribute just portions of the document.

Appendix P. Comments and Responses

Comments

- N19-19** *M*. Clean-Up After Usage. Page 6-74, paragraph 5, indicates that coral reefs are within a half mile of Dillingham. How will you clean them up if erosion or wildfire should damage them?
- N19-20** Do you intend the Strykers to be here forever, or are you planning to evacuate Schofield Barracks, Dillingham Airfield and Pohakuloa sometime and leave them destroyed and unusable like Waiahole, Waikane, Halawa and Makua Valleys?
- N19-21** L. CONCLUSION: The Islands are too fragile for 300 19-ton Strykers and their accompanying service, maintenance, personnel and dependents. This is not just an NIMBY PLEA; THERE ARE OTHER AREAS IN THE WORLD THAT COULD HANDLE THIS INVASION; neither Oahu nor the Big Island of Hawaii can do so. Go back to the drawing board!

Mahalo!

Ms. Patricia L. "Pat" Patterson

85-175 Farrington Highway, Makaha, HI 96792-2188
Telephone: (808) 696-7016

** formerly Ala Mahihee*

Responses

- N19-17**
The Wildland Fire Management Plan is now finalized for the Islands of O'ahu and Hawai'i and was revised based on lessons learned from the most recent fire at Makua.
- N19-18**
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. The WFMP goal of protecting human life includes non-military people as well.
- N19-19**
These are not expected to be project impacts.
- N19-20**
If the Army were to vacate any lands in Hawai'i it would be addressed by a centrally managed program that involves the identification, investigation, evaluation, and, if needed, remediation of potential sites. This program, called the Installation Restoration Program, is coordinated with the state and the US EPA to insure compliance with all laws and regulations. The Army is committed to cleanup existing sites as required and to prevent new sites in accordance with applicable laws and regulations.
- N19-21**
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. In accordance with NEPA regulations, the Army is conducting this EIS in order to identify the direct, indirect and cumulative environmental effects of the proposed action on the ROI. If the Army decides to implement the proposed action, the Army will mitigate all significant impacts in order to minimize the overall environmental impacts of the proposed action. This decision will be based on the results of this EIS, and on consideration of all relevant factors including mission, cost, technical factors, and environmental considerations. This EIS considers a reasonable range of alternatives including several alternatives that involve transforming and/or training on the U.S. mainland. As discussed in Section 2.6, the mainland alternatives were not analyzed in detail because they did not meet the purpose and need of the proposed action. (Complete details on the proposed action are presented in Chapter 2 and Appendix D.)

Comments

-----Original Message-----

Letter From: Pomai Bertelmann [mailto:iliahi343@yahoo.com]
20 Sent: Monday, December 01, 2003 10:28 AM
To: Barger, Cindy S
Subject: QUESTIONS REGARDING SENSITIVE AREA AT POHAKULOA TRAINING AREA

ALOHA - WE ARE THE KANU O KA AINA CHARTER SCHOOL STUDENTS IN GRADES 8-12 FROM THE COMMUNITY OF WAIMEA IN THE DISTRICT OF KOHALA. WE ARE CONDUCTING A SCIENCE FAIR PROJECT THAT POSES THE QUESTION:

N20-1 | Has the military thoroughly educated Hawaii's communities about the proposed Stryker Brigade combat unit at Pohakuloa Training Area?

WE HAVE A FEW QUESTIONS THAT HAVE COME ABOUT SINCE REVIEWING YOUR ARCHAEOLOGICAL SENSITIVE AREA MAP. WE WOULD APPRECIATE YOU ANSWERING OUR QUESTIONS TO THE BEST OF YOUR KNOWLEDGE. ANY INFO THAT YOU CAN HELP US WITH WILL BE A BENEFIT TO THE EDUCATION OF OUR HAWAII COMMUNITIES AT LARGE.

N20-2 | 1. How far back are the bombing zones or set back areas from the sensitive areas as marked on the map?

N20-3 | 2. What is the reason for having the Stryker Brigade Combat Unit expansion in Hawai'i?

N20-4 | 3. How much land is currently acquired for maneuvers at Pohakuloa Training Area?

N20-5 | 4. How much more land does the military plan to acquire for the new the proposed stryker brigade?

5. Can you please send us pictures, colored maps, overview or background information as to how this proposal came about.

N20-6 | 6. Can you please put us in touch with your cultural liasons

Mahalo,
Kanu O Ka yAina Students

Responses

N20-1

The community outreach plan included members of Cultural groups, Focus groups, Community Support Groups and Public Sessions. This outreach plan ensured a balanced coverage of all concerned community groups both on O'ahu and the Big Island. Moreover, we held two comprehensive scoping meetings and two comprehensive public meetings on the Big Island to ensure the public was aware of our proposals and had various opportunities to be a part of the process and provide input in the form of comments, suggestions and ideas.

N20-2

While it is true that the maximum range of many weapons may exceed the impact area on some ranges, the charges for the munitions used on those ranges are reduced to avoid rounds landing outside the impact areas. Therefore the chances of a round landing outside the impact area are very small. All ranges have a designated safety zone as well. The safety zone are set so that the odds of a round landing outside this zone are, statistically, one in a million. This has been determined to be a less than significant impact so no mitigation is necessary.

N20-3

As discussed in section 1.6 of the FEIS, the ROD for the Programmatic EIS directed the 2nd Brigade, 25th Infantry Division (Light) at Schofield Barracks, Hawai'i to transform to an SBCT. The Commanding General of the 25th ID (L) is charged with deciding how best to achieve that directive and provide for military training, readiness, and facility requirements to meet SBCT transformation needs, while enabling the current forces to continue carrying out their missions and giving due consideration to environmental factors. This decision will be based on the results of this EIS, and on consideration of all relevant factors including mission, cost, technical factors, and environmental considerations. This EIS considers a reasonable range of alternatives including several alternatives that involve transforming and/or training on the U.S. mainland. As discussed in Section 2.6, the mainland alternatives were not analyzed in detail because they did not meet the purpose and need of the proposed action. (Complete details on the proposed action are presented in Chapter 2 and Appendix D.)

N20-4

The Army provided maps from the DEIS to the commenter as requested.

Responses

N20-5

The proposal for the Army to transform was analyzed in a Programmatic EIS completed on March 8, 2002. The Record of Decision for this EIS was signed on April 11,2002. The process of alternative selection is presented in Chapter 2 – Description of the Proposed Action and Alternatives.

N20-6

Please contact Mr. Mike Egami, the Transformation Community Liaison at (808) 656-1168.

Comments

Comments

January 1, 2004

Letter

N21

To: Cindy Barger SBCT EIS Project Manager
U. S. Army Corps of Engineers
Honolulu District.

Fr: Ko'olauloa Hawaiian Civic Club
P. O. Box 532
Hau'ula, Hawaii 96717

Re: Comments on SBCT Draft EIS

Ko'olauloa Hawaiian Civic Club is opposed to the proposed use of lands on Oahu and Hawaii Island for the purpose of Stryker Brigade Combat Training.

The Ko'olauloa Hawaiian Civic Club was organized in June 1924 by Native Hawaiians dedicated to the preservation of our culture. To accomplish this end we are committed to preserve and perpetuate our language and history and to support the education of Native Hawaiians. To accomplish these objectives we are active participants in the pursuit of social, economic and civic development and success of our people.

Historically the United States of America has not been the best partner in our endeavors. We are the First People of Hawaii whose lands were illegally taken by the USA. We have been reduced to the lowest levels in health, education and economics of all of the residents of Hawaii. Even our culture and language are being "managed" to fit the program to lure tourists to Hawaii.

N21-1

KHCC Practices Ho'oponopono (set things right), Kokua (help), Ohana (family), Malama Pono (take good care), Lokahi (harmony), 'Ike (recognition), Aloha (love), Kupono (honesty), and Laulima (cooperation). The Stryker proposal is an offense to malama pono ka 'aina (take good care of the land). The EIS does not put concern for the impact to the land first but addresses it as a necessary evil. It has reduced the value of our land, environment and culture to zero.

N21-2

We say no to further acquisition of our land by the US military and no to the SBCT. Hawaii is a small island state limited in land and resources. There are more threatened animal and plant species in Hawaii than any where else in USA. Some of the worst damage to the environment in Hawaii can be attributed to those lands managed by the military over these many years of occupation.

N21-3

Finally, we are most disturbed that the voluminous EIS presented to the public did not include the Army's planned use of howitzers in SBCT live fire training nor does it

N21-4

include the use of helicopters. Also, during the hearings on Oahu the military limited

Responses

N21-1

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.

N21-2

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.

N21-3

After the publication of the Draft EIS, the Army announced plans for an enhancement package for SBCTs. The enhancements include an aviation task force, an increase from twelve to eighteen 155mm howitzers in the direct support artillery battalion, and improvements to command, control, communications, computer, and intelligence (C4I) assets. The announcements indicated that the aviation task force would include Comanche helicopters when the aircraft were ready for fielding. In February 2004, the Army determined that no further testing or fielding of Comanches would occur and canceled the Comanche program. The SBCT aviation task force will come from existing 25th ID(L) aviation brigade assets and will result in minor changes to training, primarily some increased aviation training over WPAA in support of units training in that area. The FEIS has analyzed the impacts of the increased aviation training over WPAA and those impacts are minimal. The Draft EIS analyzed the impacts of twelve 155mm howitzers, a change from the eighteen 105mm howitzers currently in the direct support artillery battalion for 2nd brigade. The addition of another six 155mm howitzers was analyzed in the FEIS and resulted in minimal changes to noise impacts and no change in the overall determination of effect. The C4I improvements are not expected to have any impacts on the environment. Overall, the Army has determined that the enhancements are within the original scope of the proposed action as described in the Draft EIS, are minor in nature, and do not require a supplemental Draft EIS.

Comments

N21-4
cont'd

testimony from the public by holding meetings in private locations and banning persons holding signs from testifying. We cannot accept that the requirements of EIS has been met. We expect further hearings to be scheduled to review the additional information regarding live fire exercises.

These comments are being forwarded to Senators Daniel Akaka and Dan Inouye and Congressmen Ed Case and Neil Abercrombie. Their support of this program is reprehensible. Money appears to be the primary motivation which perpetuates the further colonization and militarization of Hawaii.

We look forward to receiving full response to concerns and the announcement of future hearings.

Cathleen Pi'ilani Mattoon, President
Ko'olauloa Hawaiian Civic Club

Responses

N21-4

During the scoping meetings, the public facilities would not allow the meetings to extend beyond 10:00pm. This time restriction required that members of the public keep their oral comments short. After many public comments about the length of the meetings, and in an attempt to allow for full participation of all people present, the Army decided to hold the Draft EIS public meetings at private facilities where the facility was open as long as the Army needed. The majority of the Draft EIS public meetings did not conclude until after 12:00am.

At the first two meetings Honolulu Police Department arrested a total of seven people for trespass when they attempted to enter the facilities with signs. All individuals were advised that they were welcome to enter the facilities without the signs.

It was not the intent of the Army to restrict the public through the format and location of the public meetings. We corrected the situation by working with the other facility locations to allow signs in the meeting rooms and provide tables for members of the public to display signs and information. In addition, we worked with the facilities and the City and County of Honolulu's prosecutor and all charges were dropped against individuals involved in the situation. All of the individuals who were arrested had the opportunity to participate in subsequent meetings and most of them attended and provided public comment.

Comments

December 30, 2003

Letter

N22

Cindy Barger, CEPOH-PP-E
 SBCT EIS Project Manager
 U.S. Army corps of Engineers, Honolulu District
 Building 230
 Fort Shafter, Hawai'i 96858-5440

RE: SBCT Draft EIS

Dear Ms. Barger:

N22-1

Attached are the comments approved by the Ko'olauloa Neighborhood Board # 28 at its November meeting. The Board has significant problems with this project and this EIS. Subsequent to the Board passing the attached comments the newspaper has reported that the military is now looking at using the area for helicopter landings and howitzer fire training neither of which were addressed in the EIS. Thus the EIS is incomplete and a supplemental should be prepared. The Neighborhood Board has already on page three of its comment questioned the completeness of the document because of the action of addressing Drum Road impacts in a separate document. The increase and or addition of these two uses further question the adequacy of the Draft EIS document.

The Neighborhood Board respectfully requests an answer by its January 8th meeting on its request for a supplemental EIS document.

Sincerely,



Creighton Mattoon, Chair
 Ko'olauloa Neighborhood Board

CC: Senator Daniel Innoye
 Senator Daniel Akaka
 Representative Neil Abercrombie
 Representative Ed Case
 Governor Linda Lingle
 Mayor Jeremy Harris
 Senator Melody Aduja
 Representative Colleen Meyer
 Councilmember Donovan Delacruz

Responses

N22-1

After the publication of the Draft EIS, the Army announced plans for an enhancement package for SBCTs. The enhancements include an aviation task force, an increase from twelve to eighteen 155mm howitzers in the direct support artillery battalion, and improvements to command, control, communications, computer, and intelligence (C4I) assets. The announcements indicated that the aviation task force would include Comanche helicopters when the aircraft were ready for fielding. In February 2004, the Army determined that no further testing or fielding of Comanches would occur and canceled the Comanche program. The SBCT aviation task force will come from existing 25th ID(L) aviation brigade assets and will result in minor changes to training, primarily some increased aviation training over WPAA in support of units training in that area. The FEIS has analyzed the impacts of the increased aviation training over WPAA and those impacts are minimal. The Draft EIS analyzed the impacts of twelve 155mm howitzers, a change from the eighteen 105mm howitzers currently in the direct support artillery battalion for 2nd brigade. The addition of another six 155mm howitzers was analyzed in the FEIS and resulted in minimal changes to noise impacts and no change in the overall determination of effect. The C4I improvements are not expected to have any impacts on the environment. Overall, the Army has determined that the enhancements are within the original scope of the proposed action as described in the Draft EIS, are minor in nature, and do not require a supplemental Draft EIS. Presently Drum Road is used for access to the Kahuku Training Area (KTA) and the Kawailoa Training Area (KLOA) during current force training activities. The existing road lacks proper drainage and safety measures such as guard-rails, barriers, and warning signs. To safely continue using Drum Road for current force training activities considered mission-essential, the Army is proposing upgrades to the road, regardless of the final decisions on SBCT in Hawai'i. If the Army decides to transform to SBCT in Hawai'i, the Army would use Drum Road for access to the KTA and KLOA regions, as such the use of Drum Road is discussed in this EIS in Chapter 7. Since the proposed upgrade of Drum Road is a single and complete project separate for the proposed SBCT, the upgrade itself is discussed in Chapter 9 of this document in relation to cumulative impacts.

Comments

TO: Cindy Barger, SBCT EIS Project Manager
 U.S. Army Corps of Engineers, Honolulu District

FR: Ko'olauloa Neighborhood Board #28

RE: Comments on SBCT Draft EIS

The Ko'olauloa Neighborhood board encompasses the Kahuku Training Area and as such represents people who will be affected by this action. These comments are arranged in two parts the first are general comments about the overall proposals, impacts and the concerns the board has about the document. The second part goes through Chapter 7 section-by-section and raises questions specific to these sections.

The Board wishes to express its support for our military men and women in uniform and acknowledge that this support should not be construed to imply support for this project which the Board has significant concerns about.

PART I

N22-2

The Department of Defense (DOD/military) owns a vast amount of land in the Hawaiian Islands. The board has heard the argument that different branches of the DOD i.e. the Army and Marine Corp need their own training facilities, as it is difficult to coordinate using each other's facilities. The Neighborhood Board does not agree with this assessment and points out that there is sufficient land owned already in the state to meet training needs. The DOD should require all branches of the military to coordinate their training activities instead of purchasing more of a very limited commodity in Hawai'i i.e. 'aina (land) for destructive military purposes. The military should first learn to share its training resources before coming to the community and asking for more.

The document largely asks the community to trust the Army that they will make the best faith effort and do things right. You have picked a poor time to expect this kind of trust. The DOD in general as well as the Army in particular does not have a great track record. Just a few examples the "controlled burns" at Makua, the inability to honor any commitment to clean up and return any site that has been used for live ordinance fire.

N22-3

Although the document has done a good job of disclosing the impacts on site and admitting that the Army intends to do no mitigation to minimal mitigation, which is the purpose of the NEPA process it has failed to adequately address offsite impacts. The document also fails to look at all cumulative impacts by separating out the assessment of Drum Road into a separate document, which amounts to piecemealing of the project. This is not allowed under NEPA. Until you combine these processes under one document and timeline you fail to address all negative impacts of the action at the same time.

N22-4

N22-5

Offsite impacts not adequately addressed include:

- Long term health hazards on residents and school children of particulate dust levels that exceed the federal standard. You note that PM10 emissions (dust

Responses

N22-2

There are no other branches of DOD who own any tract of land large enough to be used for off road maneuver training on the islands. Existing ranges were evaluated for this use and were found lacking. However, the Army does coordinate with and make available it's training areas to other DOD agencies such as the Marines, Navy, and Coast Guard.

N22-3

Mitigation measures likely to occur are outlined in the Executive Summary. These proposed mitigation measures were included for public comment. The Army reviewed the measures based on public comments and the benefits of each measure to reduce impacts. The Army has listed those mitigation measures that are high priority and those that are unlikely to occur because of limited resource, unfeasible or there are similar measures already in place. The ROD will indicate which mitigation measures will be implemented.

N22-4

Presently Drum Road is used for access to the Kahuku Training Area (KTA) and the Kawailoa Training Area (KLOA) during current force training activities. The existing road lacks proper drainage and safety measures such as guard-rails, barriers, and warning signs. In order to safely continue using Drum Road for current force training activities, the Army is proposing upgrades to the road, regardless of the final decisions on SBCT in Hawai'i. If the Army decides to transform to SBCT in Hawai'i, the Army would use Drum Road for access to the KTA and KLOA regions, as such the use of Drum Road is discussed in this EIS in Chapter 7. The Transformation EIS recognizes the need to include all projects and actions directly related to or dependent upon SBCT and covers 28 projects and actions in its scope. Since the proposed upgrade of Drum Road is a single and complete project separate for the proposed SBCT, the upgrade itself is discussed in Chapter 9 of this document in relation to cumulative impacts.

N22-5

The discussion of fugitive dust issues has been expanded in the Final EIS to include results of dispersion modeling to estimate PM10 concentrations from vehicle activity on unpaved roads and in off-road maneuver areas. 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

Comments

Responses

N22-5
cont'd

particulates) would increase by 315 tons per year to 476 tons meaning that currently the community is only exposed to 161 tons per year. This amount would violate both state and federal air quality regulations. You note that the impact "poses the greatest potential for creating either nuisance conditions at nearby off-post locations or localized violations to ... standards". The document does not discuss the potential long-term impacts to the surrounding populations especially children and asthma suffers of prolonged exposure over many years to these levels of wind blown particulates. You also do not link this impact to the very real fact that as activities progress the dust may become contaminated with lead, asbestos and PCBs which makes this dust even more dangerous to the long-term health of inhabitants of the area. You describe possible mitigating measures but then say "These mitigation measures, if implemented," again we question your commitment to mitigate anything if you are allowed to proceed. There is also a proposed increase in these emissions of another 163 tons from wind generated erosion due to the activity this increase is not short term or even remotely localized in nature.

N22-6

- Impacts on the aquifer of accidents and spills of oils and other chemicals from the wash down and training activities. You claim that the wash down facility will separate and recycle the water and oil/contaminants. There are no details as to how this will be done and the remoteness and controlled access to the area assure that no state or community organization will know if it is being done or ignored.

N22-7

- You talk about fire hazards being increased and that you will do all you can to control it. As previously stated you have shown how well you do that at Makua. When this Neighborhood Board was asked to support your initial purchase at KTA from Campbell Estate the then Army Command here promised us that there would be no live fire training on the site. People in your command may change often but this is a stable community that expects institutions to honor their promises. On top of the increase in hazard from live fire (which was promised never to happen) you mention the increase from discarded cigarettes which is a clear example of the institution's lack of aloha for the `aina. That you would accept as a matter of course that your soldiers will not properly dispose of their cigarettes but will and are expected to just throw them on the ground is an indication of the level of "sensitivity training" you propose to give your personnel regarding the culture of the `aina (land) and its significance to the Hawaiian people. What happens if a fire gets to Kahuku town?

N22-8

- The community of Kahuku with the assistance of the Neighborhood Board has worked for many years to get its flooding problems under control. The document does not address the impact of your activity on flooding problems in the area. Facts: water runs down hill and water flows faster off compacted, eroded, non-vegetated land. Why would you think that this is an impact you do not have to address?

N22-9

- The military has shown this community over and over that it can not be a responsible steward of the land where live ammunition is concerned. The DOD has not honored any commitment to clean up and return land after live fire. Because of the dismal track record in this area and the fact that a promise was

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.

N21-6

Inspections of hazardous waste generating facilities are required under federal law (RCRA), and inspection records are available to the public. The State of Hawai'i is authorized to enforce sections of RCRA and will have access to perform inspections. The Army is required to maintain maintenance and inspection records and to account for all waste generation and disposal. Internal audits of waste facilities are conducted by the Army as part of its standard procedures. Wastewater discharges are regulated under the Clean Water Act, and require a permit. These provisions of the CWA are enforced by the state. It would be illegal to discharge process wastewater to the ground without a permit. These protections, and the ability of the public to access records, are built into the law and regulations that apply to the facility operations. One of the principal purposes of building a modern facility is to enable operations to be conducted in an environmentally protective manner, using limited water resources efficiently, and collecting and disposing of waste properly. At this time, the details of the design are not available. However, pollution control technology, waste containment, and wastewater recycling equipment are sufficiently standardized that the Army can estimate the cost of the facilities reasonably accurately.

N21-7

Smoking would not occur during mounted or dismounted training along any of the project trails or roads. Smoking on the installations during training would only be allowed in administrative bivouac sites or designated areas. Both types of locations would have receptacles for the proper disposal of tobacco products and associated lighting devices (e.g. matches or lighters. The munitions used will be Short Range Training Ammunition (SRTA) that, while technically considered live-fire, have plastic bullets with a range of only 500 feet. The potential for fire is also extremely low and the EIS impact analysis identified no significant impact from training activities at KTA. The munitions used will be Short Range Training Ammunition (SRTA) that, while technically

Comments

Responses

- N22-9 cont'd | made that there would be no live fire on the site as part of the prior purchase no live fire should be allowed.
- N22-10 | In general this document has more “wiggly words” to qualify mitigation measures than any this Board has ever reviewed. A mitigation measure that is implemented “if practicable” or “feasible” is not a mitigation measure but a statement of good intentions at best and more likely an empty promise.

PART II

7.1.1
Construction
- N22-11 | The washdown facility - what is its impact on ground water should the oil receptor facility breakdown or not be present or used? What is the impact of the spread of alien species into native species areas as seeds from non-natives are carried off in the wash down water? The collective training facility construction section mentions latrines – what method of disposal is proposed? What systems will be put in place to assure that if a major storm hits during construction the coastal plain will not get a mud bath? What are the possible interference impacts of the proposed antenna arrays?

Training
- N22-12 | As previously stated no live fire should be allowed in the area per the Army’s prior promise – if you are going to continue to propose it the document is incomplete without a discussion of frequency of accidents at live fire facilities world wide so that the community may better address this inappropriate use. This discussion should include wounding and mortality rates for personnel, frequency of brush fires and success with control of same, damage to property and civilians.
- N22-13 | Again the lack of the addressing of impacts of the use of Drum Road by this brigade in this EIS makes this a flawed document under NEPA.
- N22-14 | Table 7-1 the documents notes that many impacts may be mitigated to less than significant but when you get to the discussion of mitigation it is not described in the usual terms of shall and will but in terms of where practicable and where feasible. The very language implies that the will to mitigate an impact to less than significant is seriously lacking. Therefore the Board questions every instance in which the Army states its intention to mitigate an impact from significant to not significant. All such references in all tables in the document are hereby question and a request is made that in each instance the document define the concrete difference between significant and less then significant impact.

considered live-fire, have plastic bullets with a range of only 500 feet. The potential for fire is also extremely low and the EIS impact analysis identified no significant impact from training activities at KTA.

N21-8
Management practices would be implemented to reduce impacts on downstream flooding by reducing rates of runoff in areas affected by the project. However, existing flooding risks would not be mitigated.

N21-9
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. As a mitigation measure for safety, 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 Closure (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. The munitions used will be Short Range Training Ammunition (SRTA) that, while technically considered live-fire, have plastic bullets with a range of only 500 feet. The potential for fire is also extremely low and the EIS impact analysis identified no significant impact from training activities at KTA.

N21-10
Mitigation measures likely to occur are outlined in the Executive Summary. These proposed mitigation measures were included for public comment. The Army reviewed the measures based on public comments and the benefits of each measure to reduce impacts. The Army has listed those mitigation measures that are high priority and those that are unlikely to occur because of limited resource, unfeasible or there are similar measures already in place. The ROD will indicate which mitigation measures will be implemented.

Comments

Responses

May 2004

Stryker Brigade Combat Team Final EIS, Hawai'i

P-220

7.2 Land Use/Recreation

The land use as noted of agriculture, conservation resource and preservation is inappropriate for the proposed use and if the Army were not part of the federal government and had to go through the permitting process this use would be denied – therefore the expansion of the use proposed under this document should be denied.

N22-15

The section about continuing recreational use of the area appears to unrealistic, 1) it is only allowed when the military is not training, 2) safety becomes an immense issue with live fire and ordinance. The Board seriously doubts that continued recreational use will be allowed at all. This discussion seems to be to placate the current users into thinking that continued use will be allowed when in reality with the increase in activity (i.e. Sniper and machine gun training 355 days a year) and type of activity proposed continued use is not feasible. There is discussion of access permits being necessary. How would these be obtained and where – if you have to go to a military base there is no way any access permit will ever be applied for. One way to stop access while maintaining that you allow it, residents have learned, is to just make the permit incredibly difficult to get. As noted on page 7-13 to access the Schofield-Waikane trail written permission is required from the Schofield Barracks Range Control and a permit is needed from Army Support Command. How many permits have been given in the last 12 months? Where is there discussion on access for native practitioners?

7.3 Visual Resources

Sensitive Views

N22-16

The document mentions the scenic views mauka that are noted in several community plans. The document then states that it will be partially visible and will impact views and will do nothing to mitigate this impact. It also does not address the view impact of large dust plumes from equipment. Even if the equipment itself is not visible the dust it creates will be and this is not discussed. Your discussion of view impacts also only discusses the impact from ground level and not the impact from upper elevations such as the hotel.

7.4 Airspace

N22-17

The section again talks about no significant impact but never quantifies the increase in numbers of aircraft. It notes that the aircraft will be the same as those in the area now so noise impacts won't change, it notes that currently there are average movements of 3,500 aircraft per month but does not clearly state whether this number will go up or stay the same. The document states that the proposed action would not result in any major change to Army helicopter flight operations. Please define "major change" i.e. six more flight per month, 20, 400?

N21-11

Since the water is being recycled, a breakdown in the system would not result in a spill but a shut down of the facility until the problem is resolved. All water would be retained at the facility. Any temporary latrines will be port-a-pottys. They would be periodically pumped and wastes disposed of by a contractor. The EIS has determined that there is no significant change to wastewater and wastewater treatment if the proposed action is implemented. The Army abides by all applicable laws and regulations in the design and management of its wastewater facilities. All required erosion prevention measures will be installed during the construction phase to minimize erosion during storms. An Electromagnetic Compatibility (EMC) study for the SBCT-5 training sites on O'ahu and PTA was conducted. Over 65,500 frequency records were considered in this study from the civil sector and other federal government agencies. Results indicate no significant interference problems should be encountered on O'ahu and PTA during the operation of the Enhanced Position Locating and Ranging System (EPLRS), backbone of the training systems on the FTI Sites.

N21-12

The munitions used will be Short Range Training Ammunition (SRTA) that, while technically considered live-fire, have plastic bullets with a range of only 500 feet. The potential for fire is also extremely low and the EIS impact analysis identified no significant impact from training activities at KTA.

N21-13

Presently Drum Road is used for access to the Kahuku Training Area (KTA) and the Kawailoa Training Area (KLOA) during current force training activities. The existing road lacks proper drainage and safety measures such as guard-rails, barriers, and warning signs. In order to safely continue using Drum Road for current force training activities, the Army is proposing upgrades to the road, regardless of the final decisions on SBCT in Hawai'i. If the Army decides to transform to SBCT in Hawai'i, the Army would use Drum Road for access to the KTA and KLOA regions, as such the use of Drum Road is discussed in this EIS in Chapter 7. Since the proposed upgrade of Drum Road is a single and complete project separate for the proposed SBCT, the upgrade itself is discussed in Chapter 9 of this document in relation to cumulative impacts. Drum Road upgrades will be updated in a separate NEPA document.

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May 2004

Stryker Brigade Combat Team Final EIS, Hawaii

P-221

7.5 Air Quality

N22-18

Dust generation – this was previously covered under Part I due to the serious non discussion of long term cumulative health impacts. However in this section you discuss maintaining vegetation and re-vegetation as mitigating measures yet you admit that it is uncertain if effective vegetation reseeding programs could be implemented. Therefore there is no mitigation of these long-term effects as well as no mitigation for the erosion caused by 20 ton vehicles at KTA. The document further state that even if you are inclined to rotate training areas (which later in the document you note is not possible because of the topography) it is unlikely that the down time would allow for re-vegetation.

7.6 Noise

N22-19

The document notes that the activities will exceed the urban acceptable dBA levels – since the activity is taking place in a rural community and is proposed to reach in excess of 85 dBA this should be described as a significant impact. If one vehicle is 72 to 85 dBA what is the impact of up to 241 vehicles at a time?

7.8 Water Resources

N22-20

This is an area of high rainfall which will exacerbate the erosion, and run off that have already been described as happening as a result of the proposed action. The fact that there is no discussion of this impact on the areas below the training area is a significant flaw in this document. The Board also believes that there is potential for ground water contamination as a result of oil spills during training, the wash down facility activities, as well as the environmentally hazardous substances found on-site as construction takes place none of these potential impacts are discussed. This is an issue for the entire Island as Board of Water supply documents establish that all the aquifers are linked and that contamination travels from one to the other. The Windward side is the greatest source of water recharge for the island and the potential to contaminate our area with this activity is real. The Army has already shown an inability to control its activities.

N22-21

Under surface water quality there is a statement that none of the watershed in the KTA has been identified as Category I watershed in need of restoration. This is probably because the use in the area has been low. If this proposed action goes forward resulting in maneuvers involving up to 241 vehicles some weighing 20 tons and the admitted inability to control erosion or vegetation stripping caused by the activity this will probably change. Damage to this training area would impact the recharge ability of the watershed. The section also notes that soil erosion has been identified as a potential problem in the Ko'olau Mountains and that major causes of erosion are pigs and human activity. It then goes on to inappropriately compare the proposed activity to the impacts of hiking, dirt biking etc.

N21-14

Mitigation measures likely to occur are outlined in the Executive Summary. These proposed mitigation measures were included for public comment. The Army reviewed the measures based on public comments and the benefits of each measure to reduce impacts. The Army has listed those mitigation measures that are high priority and those that are unlikely to occur because of limited resource, unfeasible or there are similar measures already in place. The ROD will indicate which mitigation measures will be implemented.

N22-15

The munitions used at KTA will be Short Range Training Ammunition (SRTA) that, while technically considered live-fire, have plastic bullets with a range of only 500 feet. As discussed in Section 7.2.1, authorized recreation uses of KTA would not change. Unauthorized recreation access would be subject to additional limitations as a result of fencing and the introduction of live-fire training. SDZs would be clearly identified and no public access would be permitted during live-fire activities. There will be no change to access. Those wanting access to military lands already require a permit. Access for native practitioners is discussed in section 7.11.

N22-16

Section 7.3. identifies impacts to visual resources as less than significant, which requires no mitigation. 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.

N22-17

Section 7.4.2 states that no new aircraft activity would be associated with Proposed Action at KTA/KLOA. Therefore, the average number of aircraft movements would not change.

N22-18

The fugitive dust estimates presented in the EIS are based on EPA equations that do not account very well for the controlling effect of high soil moisture conditions. The EPA equations effectively assume a dry soil surface condition, even when precipitation frequency adjustments are included in the analysis. The result is a substantial overestimate of actual dust generation

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conditions for locations such as KTA where high soil moisture conditions are likely to prevail. The discussion of fugitive dust issues has been expanded in the Final EIS to include results of dispersion modeling to estimate PM10 concentrations from vehicle activity on unpaved roads and in off-road maneuver areas. The Army has committed to mitigating dust from vehicle traffic on unpaved roads through a combination of dust control chemical applications and/or 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. If monitoring demonstrated significant dust generation during large vehicle maneuver exercises at KTA, then the scheduling of maneuver exercises would have to avoid periods when surface moisture levels are low in the maneuver areas. The Final EIS concludes that the potentially significant impacts from fugitive dust can be mitigated to a level that is less than significant.

N22-19

The maximum noise levels from individual vehicle passby events cannot be compared to land use compatibility standards, which are based on long duration, time-weighted average noise levels. Figure 5- presents the hourly average noise levels associated with various traffic volumes on military vehicle trails. Traffic volumes on the Helemano Trail and Drum Road would be controlled to not exceed 96 vehicles per hour.

N22-20

Impacts on surface water quality from training activities, spills on Drum Road, and during construction are discussed on page 7-60 and 7-61 for the three alternatives. They are considered less than significant because they will be addressed through compliance with storm water pollution prevention plans and best management practices, as required under the Clean Water Act, and through standard spill response procedures. Storm water plans are public documents, and implementation of the components of a storm water pollution prevention program, including best management practices to prevent non-point source discharges, is a regulatory requirement with which the Army is required to comply. Similarly, the Army is required to comply with its spill prevention control and countermeasures plan.

Responses

N22-21

As described in the EIS, the initial ATTACC modeling done by the Army indicates that impacts to the land, which would result in soil erosion, would likely be severe. This is an initial estimate, but combined with the observed sensitivity of the environment to impacts from other activities, it suggests that there is reason to be concerned about the impacts. The impacts can be reduced through good management practices, but the EIS does not claim that the impacts would not be significant. We agree that significant impacts from soil erosion and significant indirect impacts from erosion on water quality could occur. These impacts would be monitored and reduced to the extent possible through implementation of the ITAM program.

Comments

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Letter
N23

LIFE OF THE LAND
Ua Mau Ke Ea O Ka 'Aina I Ka Pono
 76 North King Street Suite 203 * Honolulu, Hawai'i 96817
 Phone: 533-3454 * E-mail: lifeoftheland@hotmail.com

January 2, 2004

Ms. Cindy S. Barger, SBCT EIS Project Manager
 US ARMY CORPS OF ENGINEERS - Honolulu District, Building 230, Room 306
 Fort Shafter, Hawai'i 96858-5440
 Attn. CEPOH-PP-E
 Ft. Shafter, Hawai'i 96858-5440

Re: Comments on Army Stryker Brigade Combat Team (SBCT) Draft Environmental Impact Statement

Dear Ms. Barger:

Life of the Land is Hawai'i's own environmental and community action group advocating for the people and the 'aina since 1970. Our mission is to preserve and protect the life of the land through sustainable land use and energy policies and to promote open government through research, education, advocacy, and litigation.

We would like to preface our comments with some observations of this process, which we see as seriously flawed.

Stryker Combat Team Proposal Coincides with DOD's Fight for Exemption from Environmental Laws:

Life of the Land would be remiss not to note the irony of the timing of this proposal with the Department of Defense's battle with Congress for exemption from the National Environmental Policy Act. Life of the Land sued the Navy in 1971 regarding the bombing of Kaho'olawe, which resulted in the decision that the military must obey all environmental laws. Now, more than thirty years later, the DoD is *increasing* activity while working on *decreasing* their responsibility. Auwe!

Changes to Stryker Proposal:

N23-1

One December 20, 2003, the Honolulu Star Bulletin reported that the Stryker Brigade approved for Hawai'i may be equipped with helicopters and cannons NOT included in this Draft Environmental Impact Statement. Life of the Land is concerned that the public is, therefore, reviewing and commenting on an incomplete document. We suggest that you do a round of PUBLIC MEETINGS IN PUBLIC PLACES and a Supplemental EIS to explain the impacts of this new information. What are your plans in this regard? How will the public be notified?

The Environmental Impact Statement (EIS) Process:

An EIS is done to analyze and document the impacts of a "major federal action significantly affecting the quality of the human environment" (NEPA Sec. 102(C)). The National Environmental Policy Act (NEPA)

N23-1

After the publication of the Draft EIS, the Army announced plans for an enhancement package for SBCTs. The enhancements include an aviation task force, an increase from twelve to eighteen 155mm howitzers in the direct support artillery battalion, and improvements to command, control, communications, computer, and intelligence (C4I) assets. The announcements indicated that the aviation task force would include Comanche helicopters when the aircraft were ready for fielding. In February 2004, the Army determined that no further testing or fielding of Comanches would occur and canceled the Comanche program. The SBCT aviation task force will come from existing 25th ID(L) aviation brigade assets and will result in minor changes to training, primarily some increased aviation training over WPAA in support of units training in that area. The FEIS has analyzed the impacts of the increased aviation training over WPAA and those impacts are minimal. The Draft EIS analyzed the impacts of twelve 155mm howitzers, a change from the eighteen 105mm howitzers currently in the direct support artillery battalion for 2nd brigade. The addition of another six 155mm howitzers was analyzed in the FEIS and resulted in minimal changes to noise impacts and no change in the overall determination of effect. The C4I improvements are not expected to have any impacts on the environment. Overall, the Army has determined that the enhancements are within the original scope of the proposed action as described in the Draft EIS, are minor in nature, and do not require a supplemental Draft EIS.

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regulations of the Council on Environmental Quality (CEQ) go into considerable detail about the content and format of an EIS, and into how an EIS is reviewed, finalized, used in decisionmaking, and if necessary amended and supplemented. Source: <http://www.npi.org/nepa/impact.html>

The EIS process generally has four steps:

1. Notice of Intent published in Federal Register
2. **PUBLIC** scoping meeting is held - **THIS HAS NOT BEEN DONE**
3. *DRAFT* Environmental Impact Statement (DEIS) is published and the public has a minimum of 45-days to offer questions and comments on proposal.
4. Army **MUST** answer all questions and concerns, which are then published in the Final EIS.
5. Record of Decision is published **AFTER** FEIS is accepted.

EIS Definitions:

The regulatory definition of the term "human environment" -- impacts on the quality of the human environment being the subjects of any EIS -- includes "the natural and physical environment and the relationship of people with that environment."

The definition of "effects" -- as in "effects on the quality of the human environment" -- includes changes in the human environment that are "aesthetic, historic, cultural, economic, (or) social."

The regulatory definition of the word "significantly" -- as in "major federal action significantly affecting the quality of the human environment" -- includes as measures of impact intensity:

- Impacts on an area's unique characteristics, such as "*historic or cultural resources*, park lands, prime farmlands, wetlands, wild and scenic rivers, and ecologically critical areas".
- Impacts on "districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places" and on "significant scientific, cultural, or historical resources".

Scoping Meetings:

N23-2

Holding PUBLIC meetings in PRIVATE places is UNACCEPTABLE and, in our view, DOES NOT COMPLY with the spirit and intent of the National Environmental Policy Act (NEPA). A new round of PUBLIC meetings, held in PUBLIC places need to be held on ALL islands since this project entails money from all taxpayers. We look forward to a new round of PUBLIC meetings to discuss this proposal and request that we be 'Consulted Parties' to any actions regarding the Stryker Brigade Combat Team anywhere in Hawai'i nei.

Arresting 7 people Exercising their First Amendment Rights:

N23-3

This shameful action initiated by the Army defies EVERYTHING that the US Constitution stands for. If troops need to train to preserve freedom, how does the arrest of 7 people exercising their constitutionally protected rights uphold that very freedom? The Army's strong-arm tactics are reprehensible and Life of the Land believes that the Army needs to take the following actions to resolve the issue:

Responses

N23-2

During the scoping meetings, the public facilities would not allow the meetings to extend beyond 10:00pm. This time restriction required that members of the public keep their oral comments short. After many public comments about the length of the meetings, and in an attempt to allow for full participation of all people present, the Army decided to hold the Draft EIS public meetings at private facilities where the facility was open as long as the Army needed. The majority of the Draft EIS public meetings did not conclude until after 12:00am.

At the first two meetings Honolulu Police Department arrested a total of seven people for trespass when they attempted to enter the facilities with signs. All individuals were advised that they were welcome to enter the facilities without the signs.

It was not the intent of the Army to restrict the public through the format and location of the public meetings. We corrected the situation by working with the other facility locations to allow signs in the meeting rooms and provide tables for members of the public to display signs and information. In addition, we worked with the facilities and the City and County of Honolulu's prosecutor and all charges were dropped against individuals involved in the situation. All of the individuals who were arrested had the opportunity to participate in subsequent meetings and most of them attended and provided public comment.

N23-3

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cont'd

- issue a formal apology to all seven people arrested
- reimburse them for the time lost and expenses incurred dealing with the arrest and subsequent court hearings and
- publish a formal apology to the community stating that the Army was WRONG to arrest people peacefully protesting with a promise that the Army will uphold the Constitution, not shred it, and that no more actions of this sort will take place again

Stryker Brigade Approved for Hawai'i:

N23-4

On December 15, 2003, the Honolulu Star Bulletin published a story entitled "Stryker brigade approved for Schofield - The Army base will get 300 of the new combat vehicles and 810 more soldiers by 2005." Please explain how a decision can be made BEFORE the public comments are received and evaluated. Is this *entire* process a sham? That is certainly NOT the intent of NEPA!

Are the Strykers Safe?:

N23-5

In researching the Stryker, we have heard from some soldiers who have trained on vehicle and the stories are not good. Although we have been told they are comfortable, quite fast on the road, and very quiet we have heard that this comes at the expense of safety. Several accidents have already occurred during training due to their excessive speed. We have also learned that the Stryker has huge maintenance issues and suffers lots of problems such as not being able to fire on the move or go everywhere the tracked vehicles can go.

In early December 2003, three soldiers from St. Lewis were killed in Iraq when the Stryker rolled over in a canal and a few weeks later, another Stryker rolled over in an irrigation ditch in Iraq. The papers reported following the first accident, "Col. Michael Rounds, the brigade commander, ordered that no more vehicles be driven along roads next to irrigation canals." This seems rather impractical to us.

Soldiers have said that "at the Aberdeen Proving Grounds they didn't test with PG-7 rockets, just small arms projectiles and got penetration from 7.72 AK47 rounds when fired from the 24-inch barrel of the RPK SAW. We won't mention what the 12.7x108mm *Russian Fifty* and 14.5mm slugs did, but that was when they announced the *flawed armor supplied by subcontractors.* Standoff distance for a Monroe Effect shaped charge is 2 times the cone diameter. The PG7's outside diameter is 93mm, the charge itself is 85mm. So 85mm+85mm+ half of 85mm= 212.5mm or about 8.36 inches- call it 8 and a half inches total. The nose of a PG-7 rocket isn't 8.5 inches ahead of the front face of the 2-kilo, 4.4 pound shaped charge, so the extra standoff distance from the Stryker slats will focus the explosive effect better than a hit against bare armor, not worse. Penetration of a PG7's charge is up to 14 inches of steel armor, and Stryker's - inch armor is NOT going to pose any protection from the ones that do go off. So what we've done is make it likely that around half the rockets that hit Strykers won't go off. But the ones that do, will actually work better."

Responses

tables for members of the public to display signs and information. In addition, we worked with the facilities and the City and County of Honolulu's prosecutor and all charges were dropped against individuals involved in the situation. All of the individuals who were arrested had the opportunity to participate in subsequent meetings and most of them attended and provided public comment.

N23-4

Although the Department of Defense, Department of the Army, and Congressional representatives have issued statements that the 2nd Brigade, 25th ID(L) will transform to a Stryker Brigade, these statements refer to programmatic level decisions necessary to continue the planning, funding and assessment processes for the proposed transformation efforts and set the conditions for implementing an action once a final decision has been made. The final decision on whether the 2nd Brigade, 25th ID(L) will transform to an SBCT will be made by the appropriate local commander, subject to environmental assessment and other appropriate reviews and compliance with applicable federal law.

N23-5

The Army continues to make changes to the Stryker vehicle to make it more reliable, effective, and safe. The Stryker will continue to evolve to make it as safe and reliable as possible as part of the Army Transformation process.

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This is a photo of the Stryker in Kuwait with the 5,000+ pound birdcage the soldiers needed to install for protection. We have been told that the Stryker bird cage

**N23-5
cont'd**

- will hinder and slow vehicle commander and driver from routine egress/ingress
- widen vehicle to absurd width and will snag on objects
- does nothing for vehicle top, and vulnerable side wheel well areas

If Stryker is hit and on fire how do troops trying to escape from top avoid getting stuck/trapped in the cage?
If Stryker is hit and on fire how can troops trying to escape completely depend on only the rear door/ramp?
Why do we want to send troops into harm's way with unsafe equipment?

Life of the Land Testimony at Turtle Bay Hilton Meeting:

A'ole Stryker Brigade
Tuesday, November 4, 2003
Turtle Bay Public Meeting in PRIVATE VENUE

N23-6

- My name is Kat Brady and I am with Life of the Land and a number of other community organizations.
- We sincerely hope that the Army will ask the prosecutor to drop all charges against the people exercising their first amendment rights. It's been said that "There is only one power available to citizens which does not require great wealth or the use of violence. It is the power of collective persuasion. It works on the subtle levels of thought and conversation and it works directly through democracy." The Army's actions regarding democracy has been shameful and you owe an apology to the people who were denied entrance to testify in their own way. Please make a formal apology to those denied democracy and to all of Hawai'i for your strong-arm tactics to reject people who exercised their right to dissent.
- Your choice of venues for these meetings are unacceptable to us. It appears to have been orchestrated to deny people their right to express their opinions. Holding PUBLIC meetings in PRIVATE places is reprehensible and I hope that you are planning to hold REAL PUBLIC HEARINGS IN PUBLIC PLACES on ALL ISLANDS,

Responses

N23-6

During the scoping meetings, the public facilities would not allow the meetings to extend beyond 10:00pm. This time restriction required that members of the public keep their oral comments short. After many public comments about the length of the meetings, and in an attempt to allow for full participation of all people present, the Army decided to hold the Draft EIS public meetings at private facilities where the facility was open as long as the Army needed. The majority of the Draft EIS public meetings did not conclude until after 12:00am.

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including O'ahu, to receive public comments

- Woodrow Wilson once said, "The history of liberty is a history of resistance" and we hope that you understand that now
- Mahalo for agreeing to extend the comment period to January 3, 2004 on this complex document so that the community can offer a more thoughtful analysis of the serious issues involving the health and welfare of the people of Hawai'i, including your soldiers
- As Henry said, we serve as community members on the Central O'ahu and Hickam Air Force RABs and were the only community members of the Schofield Technical Review Committee, so we know something about the impact the military has had on Hawai'i.
- To quote the poet Arundhati Roy: "I think my eyes were knocked open and they don't close. I sometimes wish I could close them and look away... But once you've seen certain things, you can't un-see them, and seeing nothing is as political an act as seeing something."
- What I have seen of military contamination breaks my heart. Land that was farmed for generations by families has now been rendered unusable because of the massive contamination.
- According to the Hawai'i Military Land Use Master Plan of 1995 210,000 acres are already controlled by the Department of Defense, including 112,000 acres of 'ceded'/ STOLEN land, 71,000 acres of leased lands for 'secondary use', and 27,000 acres owned in fee simple. O'ahu hosts over 91,000 acres, with nearly 5,000 acres on Kaua'i, and 114,000 acres on Hawai'i Island
- Now the Army wants another 1400 acres on O'ahu and 23,000 more acres on Hawai'i Island, while the Navy is staging a grab for 6,000 additional acres as a buffer for Pacific Range Missile Facility. 'NUFF ALREADY! You are squeezing out the peaceful people of Hawai'i with your warring ways!
- The impact of the military on Hawai'i has been and continues to be HUGE.

N23-7

- * The Air Force has more than 142 sites and over 60 Areas of Concern;
- * the Navy's contamination of Pearl Harbor -- once a breadbasket for Hawai'i -- has resulted in it being designated as a Superfund, with 749 sites of significant contamination;
- * NC TAMS in Whitmore Village is another site with contamination
- * Kalaeloa - formerly Barber's Point NAS - has enormous hazardous contamination amongst its many cultural and archaeological treasures
- * Schofield was declared a Superfund because of colossal TCE (trichloroethylene) contamination in their groundwater. After \$8 million the source was never found. This is a great concern for communities on O'ahu because water is our most precious resource
- * Lualualei on the Leeward side of O'ahu has massive contamination
- * Makua Valley -- once a thriving agricultural community with springs and streams -- has suffered

N23-7

We thank you for your comment and your comment has been included into the administrative record for this process. For the purposes of this document, "ceded lands" refers to lands that were "ceded" to the federal government by the State of Hawai'i. Hawai'i was adopted as a territory of the U.S. Government in 1900 and was granted admission into the Union in 1959 via Pub L 86-3, 73 Stat 4 when the people of Hawai'i petitioned the U.S. Congress for statehood and adopted by vote in the election held on November 7, 1950 the Act of the Territorial Legislature of Hawai'i entitled "An Act to provide for a constitutional convention, the adoption of a State constitution, and the forwarding of the same to the Congress of the United States, and appropriating money therefore", approved May 20, 1949 (Act 334, Session Laws of Hawai'i, 1949). We understand that some individuals do not agree with or support the formal annexation of Hawai'i in 1898. However, issues of statehood and Hawaiian Sovereignty are outside of the scope of the NEPA process. We understand that there are several other proposed projects by the federal government and others throughout the state of Hawai'i. We have identified these projects in Chapter 9 of this document. Chapter 9 discusses the cumulative effects of the proposed action and actions proposed by the Army and other entities.

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N23-7 | hundreds of burns which destroyed endangered species and critical habitat, as well as continually
cont'd | being littered with toxic contamination and unexploded ordinance

AND THIS IS ONLY ON O'AHU!

N23-8 | And now you want to bring a Stryker Brigade that includes almost 300 Stryker vehicles -- eight-wheeled, 19-ton, armored infantry carriers, designed to move troops quickly to any place in the world. But the GAO said, "...meeting the 4-day worldwide deployment goal of a brigade-size force would require more airlift than may be possible to allocate to these brigades; at present, it would take from 5 to 14 days, depending on destination."

N23-9 | Locating a Stryker Brigade in Hawai'i will only add to the EXISTING MASSIVE MILITARY CONTAMINATION that needs to be cleaned up. I am concerned because it takes 40 years for water to percolate through the Halawa lens, where most of O'ahu gets its water and any additional contamination, on top of what is already challenging the resource, assures that we will saddle our future generations with polluted groundwater.

And while this is all happening, the military is in Congress demanding sweeping exemptions from public health and environmental law requirements. THIS IS WRONG!

N23-10 | Your EIS talks about ranges, saying that when a range becomes too contaminated, you will move to another piece of land. Ranges are full of contaminants, even depleted uranium, which has a half-life of 4.7 billion years. So you'll move your soldiers off contaminated land, but what about us? We live here. You'll leave, but we will have to live with your mess.

A Stryker Brigade will deepen Hawai'i's involvement in waging wars of aggression and occupation of other nations around the world. This is as egregious as naming the stealth bomber the "Spirit of Aloha."

THERE ARE BIG PROBLEMS WITH THE STRYKER

Every person with a loved one in the military should be very concerned about this proposal. I have a nephew in the military. Many, many military people have come out strenuously against it.

Lonnie Shultz, a former Special Agent with the U.S. Treasury Department who served in combat in Vietnam with the 101st Airborne Division and 5th Special Forces Group and a recipient of the Purple Heart medal on several occasions wrote a piece entitled "Into Harm's Way with the Stryker" in which he posits:

- N23-11**
- If a target is directly in front of the MGS (Mobile Gun System) it can fire a round. If the barrel of the gun must be rotated to either side if the centerline of the weapons carrier, firing the gun can flip the carrier over and render it unusable.
 - The Stryker is an overweight, vehicle with insufficient internal space for the infantrymen packed into the rear troop compartment. Unofficial reports indicate it is so tight that those inside cannot even take out their canteens for a drink of water.
 - And its armor is dangerously ineffective: The armor plating on the top of the vehicle might stop a 7.62-mm round, but the thin armor behind the eight big wheels will not stop anything.
 - Since the front four of the Stryker's eight wheels are used for steering, there cannot be any RPG (Rocket Propelled Grenades), skirts attached to that area or they will impede the movement of the steering wheels,

Responses

N23-8

As a result of the GAO report and ongoing Army operations, the Stryker vehicles are being modified to fit in C-130 aircraft. Additionally, deployment practices continue to evolve. The Transformation process allows for adaptations to equipment and operations to ultimately meet the goals of current, SBCT, and future forces.

N23-9

The project will include the construction of modern facilities which will reduce the potential for releases, will minimize waste, and will use water more efficiently than in older facilities. Practices that have led in the past to environmental contamination included land disposal of hazardous waste in unlined pits, and discharge of wastewater to the land. Such practices no longer occur, and the Army is addressing the contamination from past practices through its IRP program. This program, called the Installation Restoration Program, is coordinated with the state and the US EPA to insure compliance with all laws and regulations. The Army is committed to cleanup existing sites in accordance with applicable laws and regulations.

N23-10

We share and understand your concern on this issue. Our soldiers and their families live and work on our installations. As summarized in Section 4.12, the Army proposes mitigation measures to include UXO clearance activities prior to construction and during training activities to reduce the overall UXO accumulation and potential risk to human health and safety through the life of the project. This issue has the highest level of attention at the Department of Army and it is addressed by a centrally managed program that involves the identification, investigation, evaluation, and, if needed, remediation of potential sites. This program, called the Installation Restoration Program, is coordinated with the state and the US EPA to insure compliance with all laws and regulations. It is not, however, possible to estimate cost or time required related to a specific site until the evaluation phase has been completed. The Army is committed to cleaning up existing sites in accordance with applicable laws regulations. In addition, if the Army chooses to relinquish ownership of the land as a result of a Base Realignment and Closure (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.

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nor can the builder add appliqué armor to its upper sections if an airlift is anticipated.

Retired Army Maj. Gen. Paul Vallety said he has been following development of the Stryker for several years. "It's been a very controversial issue," said the Fox News military analyst in an interview. "This report **'Stryker Brigades Versus the Reality of War,'** really calls in to question whether this is the combat vehicle for the Army in the future." Gen. Vallety said:

- the Stryker seems designed more for peacekeeping operations than for combat
- the Army still has not decided what size gun to deploy on the Mobile Gun System variant
- it does not appear to be as efficient and effective as a tracked vehicle in combat operations
- it is also very vulnerable to Rocket-Propelled Grenades and sniper fire at its wheels
- it's a heavier vehicle and harder to move than what is required for very speedy mobility and transportability to areas of combat operations*

* The Washington Times www.washingtontimes.com - "Study finds new Army vehicle too vulnerable" Published August 26, 2003 HOW WILL STRYKERS BE DEPLOYED?

N23-11
cont'd

Soldiers who have trained on these vehicles said that they are indeed fast, but their excessive speed has led to many accidents. The Strykers have huge maintenance issues, and suffer lots of problems such as not being able to fire on the move or go everywhere the tracked vehicles can go.

STRYKERS BEING SENT TO IRAQ

And now you've endangered your own soldiers with the Stryker. Soldiers inside the Stryker are so cramped that they cannot even reach for their canteens in the 120-degree weather in Iraq!

"Poorly armored and entirely vulnerable to RPGs states the glossy, 108-page report prepared July 18 by consultant Victor O'Reilly. Mr. O'Reilly is an author and counter terrorism authority who has written about military affairs. He said much of his information on Stryker comes from within the Army itself.

An Army spokesman, however, said the Strykers are being fitted with added armor. This will "drastically increase their protection against kinetic energy weapons and increase RPG protection," said Lt. Col. Stephen Barger, spokesman for 1st Corps at Fort Lewis, Wash., where the brigade is being developed. As part of an accelerated development, the Army did not require Strykers to immediately feature anti-RPG armor. The brigade going to Iraq is now being fitted with slat armor.

Mr. O'Reilly, who said he did the report at his own expense, says even with the added armor the Stryker's top and wheel wells are susceptible to RPGs that could kill all 13 soldiers inside the Stryker's infantry carrier version.

Mr. O'Reilly's report, **"Stryker Brigades Versus the Reality of War,"** is being circulated on Capitol Hill and among the active force and retirement community. Among his conclusions on the eight-wheel, 20-ton infantry carrier version: "Poorly armored and entirely vulnerable to RPGs." "Wheels & wells extremely vulnerable to small arms." "Bought to be C-130 deployable but too heavy."

Responses

N23-11

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.

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We implore you to rethink this bad idea.

CLEAN UP, DON'T BUILD UP

Land Grab:

The Stryker Brigade Combat Team (SBCT) proposes to acquire even more land -- 1400 more acres on O'ahu and almost 23,000 additional acres on Hawai'i Island. This is problematic for the people of Hawai'i because we are an archipelago...our landmass is small, yet we are one of the most militarized places on the planet. The Hawaiian Islands are unlike any other place on Earth -- we are the most remote archipelago in the world and we have the dubious distinction of having the most endangered and threatened species on the planet. This makes everything we have in these Islands more precious and more in need of protection for future generations.

Life of the Land is deeply concerned because we are members of the following military committees regarding contamination:

- * Schofield Barracks Technical Review Committee
- * Air Force Hickam Restoration Advisory Board
- * Air Force Central O'ahu Restoration Advisory Board
- * Navy Pearl Harbor Restoration Advisory Board

On Schofield alone, the Army spent \$8 million and many years trying to find the source of TCE contamination only to cap the landfill on base without identifying the exact source. The community is concerned that taking even more of our precious 'aina will only create more problems for future generations.

N23-12

The Army's track record is questionable as stewards of our 'aina and kai. Makua is, sadly, a glaring example of this. The fire that was out of control last July proved that the community's concerns were well founded and even a sincere apology cannot ameliorate the damage done to that valley, one so important to Hawaiian culture.

Kahuku Training Area/Kawailoa Training Area:

Life of the Land is concerned not only with the impacts of this project, but with all the other projects currently being developed on O'ahu's North Shore. The cumulative impacts of all this development on our precious marine resources and fragile 'aina is of great concern to us. Developer Andy Anderson is building a massive gated community at Velzeyland and his project has been a source of contamination along our coastline. O'ahu has been experiencing some major rainstorms this winter, how can you assure the community and the state departments responsible for protecting the public trust that you will actually use 'best practices' to avoid erosion? How will your project, along with other nearby developments, increase ocean, surface and groundwater pollution?

N23-13

Chapter 7 of the DEIS admits that "as many as 241 vehicles could participate in a single exercise with up to 173 of those vehicles traveling to KTA along Helemano Trail and Drum Road." We note that the overall change in vehicle use would represent a 77% increase in miles traveled and an 80% increase in vehicle operating hours.

N23-14

How many vehicles currently are used in a single exercise?

Responses

N23-12

The presence of TCE and other volatile organic contamination at Schofield Barracks was likely the results of spilling of the TCE from the 1940's through early 1970's before it was known that such spilling would be potentially harmful to the environment. Use of lands for the SBCT would be subject to all the regulations in place by the Environmental Protection Agency (EPA) and the State of Hawai'i Department of Health to help prevent spillage of TCE and other compounds that might be harmful to the environment. Army practices for handling of the chemicals are much more rigorous than in the past, and these practices are carefully monitored by both State and Federal agencies.

N23-13

Chapter 2 of the EIS states that the proposed action will increase erosion in the training ranges and the impact is not fully mitigable. Chapter 9.5.2 has been revised to indicate the level of impact on surface waters from soil erosion is significant but mitigable to less than significant. Chapter 9.5.2 also discusses the impacts to marine resources which are considered less than significant.

N23-14

As detailed in Table 2-7, up to 312 vehicles will be traveling to KTA under the proposed project for the single largest exercise. Currently up to 264 vehicles travel to KTA on the roadway. Under the proposed action only 97 vehicles will use the roadway and 215 will use the trails.

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- N23-15** | What types of vehicles are currently used in training?
Are they comparable with the Stryker Brigade vehicles?
If so, how? If not, why?
- N23-16** | Does the Army have a fugitive dust problem currently relating to training at KTA?
If so, what mitigation measures are taking place?
Are these mitigation measures effective or ineffective? Please explain
- N23-17** | What other types of vehicular activities, other than transport along Drum Road, are planning for these areas?
What is the heaviest vehicle currently used in these areas?
- N23-18** | Have there been any problems with fugitive dust, emissions, or maneuvering in the area encountered?
If so, what are they? Please describe the problem and your resolution/mitigation measures.
- N23-19** | How will you mitigate the runoff from the construction of the mock village at KTA?
- N23-20** | Have you consulted with US Fish and Wildlife regarding the James Campbell Wetland?
- N23-21** | How will you ensure that run off, fugitive dust, and emission pollution will not reach the endangered species at the Wetland?
- N23-22** | We are amused that under "Less than Significant Impacts" you list "Noise from aircraft operations." The military aircraft activity on the North Shore is an increasing concern for Life of the Land. We receive many calls for residents complaining about the low-flying aircraft at all hours of the day and night. We have been told that it appears to be getting worse. We suggest that you take this issue more seriously and work on mitigating the noise and dust generated from your flights.
- N23-23** | Some residents even fear that the increased flights have caused some of the rockslides experiences on O'ahu in the last several years. Does the Army take responsibility and accept liability, if that is the case?
- N23-24** | Biological Resources:
We have included a copy of the US Fish & Wildlife's Recovery Plan for Ko'olau Mountain Plant Cluster, dated August 1996 for your information.
Life of the Land would again emphasize that the Hawaiian Islands are the most isolated archipelago on earth, making every resource we have priceless. Nainoa Thompson, Master Navigator of the Hokule'a said it best when he described Hawai'i as a canoe. This is all we have, so we must be mindful of how we use our precious and oh so fragile resources. True sustainability means that we will leave enough for future generations to meet their needs.
- N23-25** | Watershed Protection:
The University of Hawai'i's School of Ocean Engineering, Science and Technology has embarked on a huge Watershed Restoration Project on the North Shore, so drainage from the Kawaihoa Training Area and Drum Road route is a great concern to residents. Life of the Land is participating in this effort.
- N23-26** | Species Protection:
In Hawai'i's fragile environment, the introduction of alien species is devastating. Army vehicles traveling from one area to another must be mindful of the spore on the wheels of the vehicles and the boots and clothing of soldiers. What is your protocol for avoiding the introduction of alien species into pristine biological areas?

Responses

N23-15

As noted in Section 2.3, Table 2-3, and Table 2-5, the Army is using 5-ton, 6 by 6 wheeled cargo trucks, which are non-armored, and thus lighter than Stryker vehicles. Stryker vehicles are 20 tons but armored, and 8 wheeled.

N23-16

KTA is in an area of high rainfall, high soil moisture, and relatively dense vegetation cover, as discussed in Section 7.8. No prolonged fugitive dust problem is expected under such conditions. Dust may be generated during construction activities or during maneuver training in dry periods.

N23-17

As discussed in Section 2.3.4, no other transport vehicles, but mounted maneuvers will take place along Drum Road. The heaviest vehicles currently used are 5-ton cargo trucks.

N23-18

KTA is in an area of high rainfall, high soil moisture, and relatively dense vegetation cover, as discussed in Section 7.8. No prolonged fugitive dust problem is expected under such conditions. Dust may be generated during construction activities or during maneuver training in dry periods.

N23-19

Construction related erosion and water quality impacts will be mitigated through standard construction best management practices. The text of the water resources section has been revised to include a list of specific minimum BMPs that would be applied at KTA. The same BMPs would be applied elsewhere. As indicated in the EIS, nearly all project construction would be required to comply with Clean Water Act requirements to prepare a Construction Storm Water Pollution Prevention Plan, which defines training requirements, spill prevention and control measures, BMPs, reporting requirements, etc.

N23-20

Consultation with USFWS is complete and included Army training lands.

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Archaeological Resource Protection:

- N23-27** It is anticipated that there is a 'high probability' that archaeological sites will be discovered during road construction of the segment traversing KLOA. How will you handle the discovery of archaeological and cultural sites? How will the numerous archaeological sites at KTA and KLOA be protected? We note that the area for the proposed tactical vehicle wash at KTA has been surveyed and that the project area contains "no identified cultural resources." The paragraph then goes on to mention, "However a stepped stone platform (site 50-80-02-9508) is in the gulch immediately northeast of the project area, and a heiau (site 50-80-02-2501) is only a short distance to the northwest." Vehicle wash areas are a big part of the clean up that the Restoration Advisory Boards tackle. Many contaminants from vehicle wash areas have been found in gulches around the island, so this is not a remote possibility. Your document states that you will recycle the water, but after several uses, how do you propose to drain and dispose of the used, and now contaminated, water?
- N23-28**

Fire Protection:

- N23-29** Obviously this is a big issue for the community. After instituting what the Army swore were strict measures for fire control, we saw Makua Valley burn last summer. Although there is no proposed live-fire training at KTA because you of the use of short range training ammunition (SRTA), the DEIS does note a high risk of wildfires. Please include the standard operating procedures you will have, hopefully, updated since the last Makua disaster.

PCB Contamination:

- N23-30** We note that the Combined Arms Collective Training Facility (CACTF) is on a location that formerly contained PCB-contaminated soils. Your document says that "moving these soils could create a significant impact by releasing PCBs into the air and exposing construction workers, Army personnel, and the environment." We assert that there is also risk to the community as well, if the wind picks it up, which should not be ignored.

You may also be interested in knowing that the Navy is currently using a Thermal Desorption Unit at Kalaeloa (formerly Barber's Point) to clean PCB contaminated soil from their various RAB clean-up sites.

Electricity:

- N23-31** The DEIS notes that KTA gets power from HECO via overhead primary distribution lines. Has the Army considered on-site generation (fuel cells, cogeneration units, etc.) instead of relying on HECO's grid?

- N23-32** It appears that the Strykers will be traveling on state and country roads at least some of the time. If a Stryker were stuck on a public road, how would it be towed away? What impact would that have on traffic and vehicle safety? Drum Road is proposed to be a gravel road, can it handle a 20-ton vehicle? What if it gets stuck on that road? How will it be removed and what will the impact on your maneuvers be?

Dillingham (Kawaihapai) Military Reservation:

- N23-33** Life of the Land is concerned about ingress and egress on the North Shore. There is only one road going to

Responses

N23-21

Mitigations for runoff are discussed in section 9 in Chapters 5-8. Mitigations for fugitive dust and emission pollution are discussed in section 5 in Chapters 5-8. All mitigation measures are used to lessen the effects of the impacts.

N23-22

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.

N23-23

A wide variety and number of factors could be responsible for rockslides. The Army does not accept responsibility.

N23-24

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.

N23-25

The comment does not specify the location of the watershed project. If it refers to the Kaneohe Bay Monitoring Project, then we would note that KTA is not within the watershed of Kaneohe Bay.

N23-26

Measures to mitigate for nonnative species introductions are included in each chapter under the biological resources section 5.10, 6.10, 7.10, 8.10.

N23-27

All site discovery methods, protection measures and avoidance strategies and are detailed in the PA. The Final PA as signed by the Army, SHPO, ACHP and concurring parties is included in Appendix J of the Final EIS.

N23-28

As discussed in Sections 5.14.2 and 8.14.2, filtered water would be reused for the vehicle wash. Water is continually reused with no wastewater disposal. Solids from the water are separated in the vehicle wash, removed and treated with EPA approved bioremediation methods so that the solids may be used with existing soils on Army lands. A water/oil separator is included in the vehicle washes. The oil from the vehicle washes is disposed by a contractor in accordance with all appropriate laws and regulations

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- N23-33 cont'd** | Dillingham/Kawaihapi. Our concerns about Strykers breaking down and blocking access is highlighted in this area, where residents have no options if the road is blocked.
- N23-34** | How many Stryker vehicles and troops are anticipated for training in this area?
What is your safety plan for residents should something happen to block their leaving or entering their neighborhood?
What type of training will be conducted at this site? How often and for what duration?
- N23-35** | Will soldiers be staying overnight at DMR? For how long? How many soldiers?
What is the nature of the Stryker Training? Please explain in detail.

Pohakuloa Training Area (PTA):

On Hawai'i Island there are hundreds of thousands of acres littered with unexploded ordnance from years of conventional, chemical and biological weapons testing and training. 47 of more than 50 former military areas have known hazards. Military hazards are present on our lands and in our waters. Tides expose munitions buried in the sand off Hapuna Beach and in Hilo Bay. Last year several live grenades were found by school children in a Waimea Middle School garden.

- PTA is an 108,793-acre live fire area, a bombing range for all sorts of military weapons, and has been for more than 60 years. The military wants to expand PTA by 23,000 acres and maybe more.
- Besides being a sacred area, a holy place of union in Hawaiian culture, Pohakuloa has "the highest concentration of endangered species of any Army installation in the world" according to former Pohakuloa commander Lt. Col. Dennis Owen.
- PTA exists in a sub-alpine, tropical, dry land ecosystem, between 4000 and 8600 feet elevation, one of the rarest ecosystems in the world.
- There are approximately 30 species of endangered and at-risk plants and animals found at PTA.
- There are also over 250 known ancient Hawaiian archaeological sites within PTA's boundaries.

It is obvious that NO MORE land should be used in this pristine environment.

- N23-36** | The DEIS states that two new ranges will be built. This is a cause of great concern to us since we know, as RAB members, that ranges generally are not included in clean up, yet are some of the most contaminated places. At one meeting, we were told that when the Army felt that the range was too contaminated and represented a danger to the troops, they would just leave and find new land to contaminate. This blatant disregard for the community did not go unnoticed. We are, therefore, greatly distressed that as the Army professes to be good stewards of the environment, they are actually planning to abandon places they destroyed and leave them for us and our future generations. Auwe!
- N23-37** | The DEIS mentions that a road between Kawaihāe and PTA is needed so that Strykers can be unloaded from boats, but there is no mention in the DEIS that Strykers will leave Schofield by boat. Will they drive down public roads? Will they be transported by vehicle? If so, what kind of vehicle? How will they get to Pearl Harbor? What changes will be needed at the airports and harbors? This is an error in the DEIS, which is intended to include analysis of all impacts.

Responses

N23-29

The Army's Integrated Wildland Fire Management Plan has been completed and outlines specific measures to be implemented on each installation, including KTA, to reduce chance of and impact from wildfires. These measures are detailed in the biological resources chapters under appropriate mitigation and the hazards chapters.

N23-30

Section 7.12 of the FEIS discusses existing PCB contamination as an issue of potential concern if contaminated soils are disturbed without prior remediation. The FEIS notes that additional evaluations would be conducted to verify the extent of contamination and to determine the appropriate remediation program. Implementation of an appropriate remediation program prior to construction of the CACTF would mitigate this potential impact.

N23-31

The EIS has determined that there is no significant impact to public utilities and HECO energy capacity if the proposed action is implemented. For all proposed construction and use on Army lands, the Department of Public Works Master Planning program regularly assesses the energy needs and demands for Army activities and coordinates as appropriate to ensure that Army demands do not significantly impair power supply for the rest of the region.

N23-32

As stated in Section 2.2.3, to ensure maximum safety, all convoys must comply with local policies, as specified in standard operating procedures, which direct such matters as vehicle safety inspections and convoy safety briefings, and vehicle operators must be properly trained and licensed to operate assigned military vehicles. Drum Road and Dillingham trail are both being constructed to handle heavy military vehicles. The Stryker can be towed by other Strykers if necessary or heavy vehicle tow trucks can move a Stryker if needed. If the Stryker is in an area inaccessible to the tow trucks it can be airlifted to a site where it can be picked up by a heavy vehicle transport.

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Several branches of the United States Military have recently proposed a number of expansions (Stryker; Naval Carrier; Pearl Harbor Expansion; Kaneohe Marine Air Corps Station; Pacific Missile Range Facility). The cumulative effect must be analyzed.

N23-38

32 CFR 651.16 (a) NEPA analyses must assess cumulative effects, which are the impact on the environment resulting from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions. Actions by federal, non-federal agencies, and private parties must be considered. (Code of Federal Regulations (CFR) National Defense Chapter 5 – Department of the Army Part 651 – Environmental Analysis of Army Actions (AR 200-2) –Table of Contents Subpart B--National Environmental Policy Act and the Decision Process Sec. 651.16 Cumulative impacts)

N23-39 | What is likely cumulative effect of reasonably foreseeable future actions on wastewater facilities?

N23-40 | What is likely cumulative effect of reasonably foreseeable future actions on fresh water aquifers facilities?

N23-41 | What is likely cumulative effect of reasonably foreseeable future actions on electric generation facilities?

N23-42 | What is likely cumulative effect of reasonably foreseeable future actions on storm drains facilities?

N23-43 | What is likely cumulative effect of reasonably foreseeable future actions on endangered species?

N23-44 | What is likely cumulative effect of reasonably foreseeable future actions on alien species?

N23-44 | What is likely cumulative effect of reasonably foreseeable future actions on public access (fences, gates, restrictions, methods of notification)?

N23-45 | What is likely cumulative effect of reasonably foreseeable future actions on military police patrols on easements?

N23-46 | What is likely cumulative effect of reasonably foreseeable future actions on wildfire management, fire break roads?

N23-47 | What is likely cumulative effect of reasonably foreseeable future actions on air traffic?

N23-48 | What is likely cumulative effect of reasonably foreseeable future actions on vibrations caused by low flying helicopters, planes, and ground vehicles? In particular, can the increase in vibrations cause landslides, rock falls, and flora/fauna?

N23-49 | What is likely cumulative effect of reasonably foreseeable future actions on hazardous waste facilities?

N23-50 | What is likely cumulative effect of reasonably foreseeable future actions on contingency plans for evacuations?

N23-51 | What is likely cumulative effect of reasonably foreseeable future actions on the Pearl Harbor sole source aquifer?

What procedures will be used in the handling and the disposal of each of the following chemicals:

(a) Trichloroethylene (TCE; C₂HCl₃);

(b) Carbon Tetrachloride (C-Cl₄);

(c) RDX;

(d) Lead;

(e) Thallium;

(f) Arsenic;

(g) Iron;

(h) Aluminum;

(i) Manganese, and

(j) Nitroglycerin

N23-52

N23-53

The Southern Oahu Basal Aquifer, which underlies [Schofield Barracks Military Reservation] SBMR and part of the East Range was designated by the US EPA as a Sole Source Aquifer in 1987 under Section 1424(e) of the Safe Drinking Water Act (USEPA 2003). A sole source aquifer supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer, and represents a water supply source for which there is no alternative that could 'physically, legally, and economically supply all those who depend on it for drinking water.'" (DEIS page 5-106)

Responses

N23-33

As stated in Section 2.2.3, to ensure maximum safety, all convoys must comply with local policies, as specified in standard operating procedures, which direct such matters as vehicle safety inspections and convoy safety briefings, and vehicle operators must be properly trained and licensed to operate assigned military vehicles. The Stryker vehicle will be as reliable as other military vehicles traveling the highway today. The potential for disruption should be less under the Proposed Action once Dillingham Trail is constructed and the Drum Road project is completed

N23-34

Section 2.3 of Chapter 2 provides information on proposed Stryker training in Hawai'i. Table 2-5 states how many Strykers would train at each installation. The number of soldiers staying in each training area varies based on the level of training that occurs. Table 2-2 states how many soldiers are in a squad, platoon, company, battalion and brigade. In addition, safety measures associated with Stryker training to minimize impacts to the general public are discussed in Section 4.12 Human Health and Safety Hazards.

N23-35

Table 2-lists the training activities at each installation while Section 2.3 describes these training activities in detail and Appendix C provides more in depth descriptions of training.

N23-36

We share and understand your concern on this issue. Our soldiers and their families live and work on our installations. As summarized in Section 4.12, the Army proposes mitigation measures to include UXO clearance activities prior to construction and during training activities to reduce the overall UXO accumulation and potential risk to human health and safety through the life of the project This issue has the highest level of attention at the Department of Army and it is addressed by a centrally managed program that involves the identification, investigation, evaluation, and, if needed, remediation of potential sites. This program, called the Installation Restoration Program, is coordinated with the state and the US EPA to insure compliance with all laws and regulations. It is not, however, possible to estimate cost or time required related to a specific site until the evaluation phase has been completed. The Army is committed to cleaning up existing sites in accordance with applicable laws regulations. In addition, if the Army chooses to relinquish ownership of

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N23-53
cont'd

Residues of explosives and other constituents of munitions would continue to be deposited on soils and on training ranges at [Schofield Barracks Military Reservation] SBMR and PTA. Small quantities of these residues could be transported downwards through soils and rock with infiltrating water. (DEIS page 4-49)

Schofield Barracks Groundwater was and is contaminated by Trichloroethylene (TCE; C₂HCl₃) and Carbon Tetrachloride (C-Cl₄). The source of the carbon tetrachloride contamination was the SB landfill (DEIS 1967-81). TCE contamination source unknown. (DEIS page 5-107; page 5-206; DEIS Appendix K)

Although a relatively small number of samples were collected to represent the ranges, the samples were generally collected from locations that were considered to have a high probability of representing the most contaminated sites. CONCLUSION: Therefore, the sample results represent above average concentrations on the ranges overall. RDX was found in the highest relative levels among the chemicals detected on the ranges, exceeding the PRG for RDX in two composite samples of 39 composite samples taken. (DEIS page 5-134)

The Proposed Action is not expected to cause increased exposures to these chemicals because it would not place personnel in additional contact with contaminated soils. Instead, by moving mounted maneuver training to the [South Range Acquisition Area] SRAA, it would reduce some of the opportunities for exposure. (DEIS page 5-134)

Greater than Preliminary Remediation Goal (PRG) for Residential: Thallium, Arsenic
Greater than Preliminary Remediation Goal (PRG) for: Iron, Aluminum, Manganese, [Cyclo tri methylene tri nitramine] RDX, Nitroglycerin (pages M1-1 through M1-13)

The Statement "a relatively small number of samples ... the sample results represent above average concentrations" can not be justified. Small sample sizes are inherently unreliable, and great care should be used. By analogy, tossing a coin three times and coming up with three heads, does not justify a conclusion that the coin is two-headed.

N23-54

The Statement "the samples were generally collected from locations that were considered to have a high probability of representing the most contaminated sites." needs a lot of explanation. Who decided, how was it decided, what is the probability (the confidence interval estimate) that the guesswork is okay, etc.

How does "generally collected" differ from "collected"? Were some of the samples from elsewhere?

N23-55

How were "composite samples" created?

N23-56

In general, combining different samples together into one composite sample, levels out contamination. Samples with higher or lower concentrations are evened out. So how could the samples "represent above average concentrations"?

N23-57

Were the samples collected at the surface, just below the surface, or a ways underground?

N23-58

In analyzing the samples, did the Army use Quality Assurance/Quality Control (QC/QA) methods; that is, were blank samples and spiked samples used to determine the accuracy of the results?

What lab analyzed the samples?

N23-59

The EPA's Analytical Test 8330 is used to establish and confirm RDX concentrations. Isn't the statement: "RDX was found in the highest relative levels among the chemicals detected on the ranges, exceeding the PRG for

Responses

the land as a result of a Base Realignment and Closure (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.

N23-37

The soldiers will travel to Pearl Harbor in Stryker vehicles and trucks. They will travel the same route that they use today adhering to the strict highway rules pertaining to convoys on public roads. The total number of trips will not change. The Stryker vehicles can travel at highway speeds. No changes to the harbors at Pearl Harbor or Kawaihae are needed. This was analyzed in the EIS and there are no additional impacts over existing conditions. The airfields at Wheeler and Bradshaw Army Airfields are being upgraded and the impacts of the upgrade activities and use are included in the EIS in Chapters 5 and 8.

N22-38

Chapter 9 discusses the cumulative impacts of the Stryker project (SBCT) and Pearl Harbor development activities (Ship Operation and Dry-dock Waterfront Support Facilities) and other past, present, and reasonably foreseeable actions in the ROI. The Pacific Missile Range Facility and KMAC Station are on Kaua'i and outside the ROI which includes the islands of O'ahu and Hawai'i.

N23-39

Section 9 (O'ahu project #2) discusses the cumulative impacts on wastewater facilities. The Army is also putting in a new wastewater treatment facility separate from this proposed action.

N23-40

Assuming that the comment intends "freshwater aquifers," rather than "freshwater aquifers facilities" the cumulative effects in general would include effects on quantity and quality of groundwater, and on direction of flow, and are not expected to be significant. The project would slightly increase demand for potable water at SBMR, but the demand would be offset by lower demand elsewhere. The increased demand for water in the SBMR area will increase the rate of groundwater extraction, and will therefore increase the rate of remediation of the groundwater contaminant plume beneath SBMR. This will result in a beneficial impact on water quality beneath SBMR. Increased water use in the SBMR area will increase the amount of wastewater generated and

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N23-59 | RDX in two composite samples of 39 composite samples taken" misleading? Although 39 samples at 8 sites were tested for some contamination, only 9 samples at 3 sites were tested for RDX. If two of these samples were significant (22% of samples tested for RDX), isn't additional testing needed?
cont'd

The EPA's Analytical Test 8332 is used to establish and confirm Nitroglycerine concentrations. Why was it used in only 6 samples at 3 sites? What confidence can the Army have in base-wide Nitroglycerine contamination based on 6 samples?

N23-60

Why were there 4 samples from site ENG, 2 samples from site FP, 5 samples from site INF, 9 samples from site KR8, 4 samples from site MAC, 8 samples from site NFB, 2 samples from site SR1 and 5 samples from site SR2? What determined the number of samples per site?

N23-61 |

Why are the samples from site NFB labeled 1, 2, 4, 6, 8, 9, 10, 11? What happened to samples 3, 5, and 7?

N23-62

EPA's Analytic Test 8270 tests for Semivolatile Organic Compounds. EPA's Analytic Test 8270 tests for nitrosodimethylamine (dimethylnitrosamine; C₂H₆N₂). Why were only 9 of 39 samples tested for this contaminant? Why was only 1 of 8 samples at NFB tested for this contaminant? What can be said about the NFB site by testing one sample?

N23-63 |

Are any of the contaminants mobile (air, water, dust)?

N23-64 |

What are the strengths and weaknesses of the Attac Model used in analyzing the data?

N23-65

This project is of great concern to the community because the military has been the largest polluter in Hawai'i with over 1,000 contaminated sites identified and who knows how many yet undiscovered. What is the cumulative impact of all this military contamination on the health, cultural survival and the quality of life of our communities? How much total contamination and unexploded ordinances have been released into our 'aina and wai/kai over the decades? This proposal will:

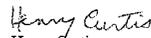
- increase military landholdings by 12.8%
- increase military-controlled land in Hawai'i from 10.8% - 11.4%
- increase live ammunition by 25%
- increase military vehicle miles by 300% overall (and 700% on Hawai'i Island)
- increase dust emissions by 7 million pounds per year

Will the Army assume liability for health problems, such as respiratory ailments, for residents experiencing problems by the 50% increase in fugitive dust?

The Army's trustworthiness is at issue, from the many, many fires in Makua Valley to Hawai'i recently finding out that we were exposed to the military's chemical warfare testing of Sarin in 1967. People are legitimately concerned about their health and welfare and that of their future generations. Please take these issues seriously and answer the communities' concerns thoughtfully and honestly.

Mahalo for this opportunity to comment.

Sincerely,


Henry Curtis
Executive Director


Kat Brady
Assistant Executive Director

Responses

treated, resulting in more treated wastewater being discharged to Kaukonahua Stream. This may result in a small increase in total dissolved solids in the stream. However, the increase is not expected to be significant compared to background levels of TDS, and would be within the range specified by the NPDES permit for the discharge.

N23-41

Section 9.5.2- Public Services and Utilities, discusses the cumulative impacts on electricity demand. The Army would be responsible for using energy-efficient materials, in compliance with EO 13123.

N23-42

As discussed in the EIS, the project would involve construction of new facilities, which would result in an increase in the impervious surface area at SBMR and other installations. An increase in impervious surface area would increase the volume and rate of storm runoff to streams somewhat, and could increase the potential for flooding if existing storm drainage systems are not large enough to accommodate the increased flows. However, the drainage systems of new facilities will be designed to accommodate the anticipated flows and prevent too rapid flushing of water at discharge points.

N23-43

These impacts are discussed in Chapter 9.5.2-biological resources. The EIS states that the net effects of SBCT activities on listed species, critical habitat and sensitive species are significant and unmitigable (pp. 9-39, 9-40). These impacts are discussed in Chapter 9.10.

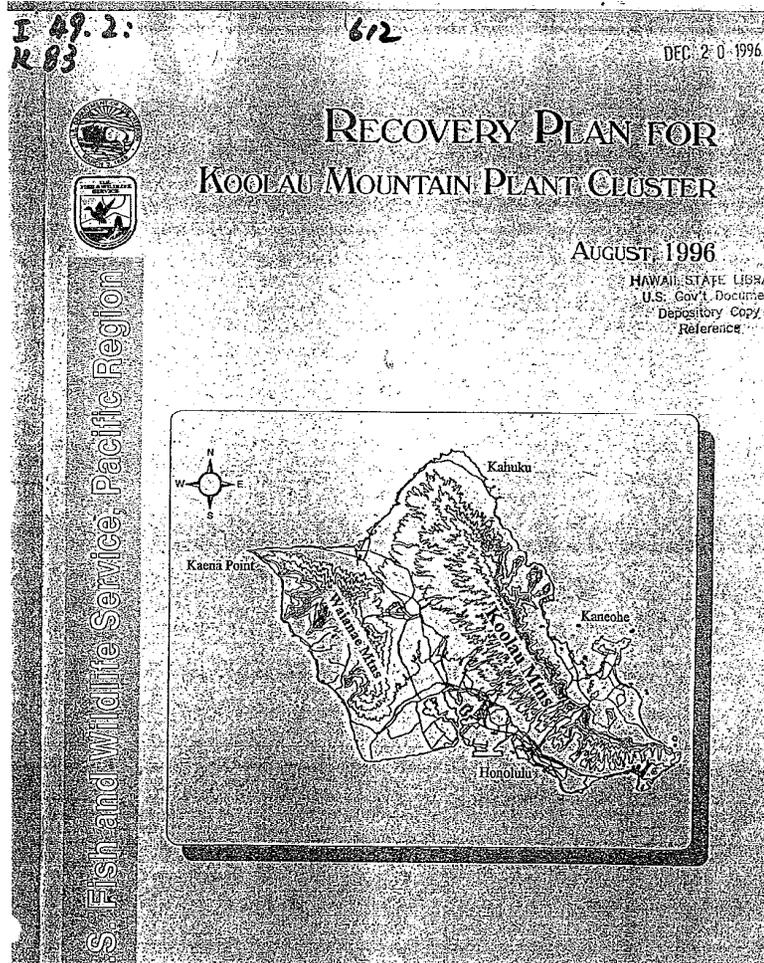
N23-44

Cumulative impacts on recreational access are discussed in Section 9.5.2 - land use Recreational trends are reflected in the sustainable community plans prepared by the City and Count of Honolulu. Trends associates with recreation resources include providing continued, and where possible, increased access to recreational resources.

N23-45

Military police activities are discussed in sections 5.14, 6.14, 7.14, and 8.14. If the Army decides to implement the proposed action, the Army will ensure that the military police are adequately staffed. As part of existing standing operating procedures, the easements will be regularly patrolled by the Army

Comments



Responses

Range Control soldiers on a daily basis during shift changes and to ensure that the gates are secured and trails are in safe conditions.

N23-46

These impacts are discussed in Chapter 9.5.2-Biological resources and is also referenced in the Integrates Wildfire Management Plan.

N23-47

Cumulative impacts on air traffic are discussed in section 9.5.2. No other projects in various other airspace ROIs have been identified. There would be a shift in the instrument approach path to BAAF on PTA, but no impact on airspace used in the ROI.

N23-48

As noted in the Draft EIS, the proposed action would not result in any meaningful change in operations by the Aviation Brigade. The added UAV flight operations would occur primarily within restricted airspace areas, and thus would have no significant impact on commercial or private aviation. Rockslides and landslides are almost always triggered by either seismic events or by saturated soil conditions that destabilize the support of overlying material. Noise and vibrations generated by aircraft and helicopter flight activity or by vehicle traffic are incapable of generating landslides or rockslides unless conditions are so unstable that natural conditions would also be expected to trigger the slide event. Cumulative impacts on air traffic are discussed in Chapter 9.5.2. Vibrations from helicopters (or any aircraft overflight) won't trigger rock slides or landslides. Such overflight would produce the pressure fluctuation equivalent of light to moderate winds. Overflight effects on flora and fauna are discussed in the biological resources sections, Sections 4.10, 5.10, 6.10, 7.10, and 8.10, as well as Section 9.

N23-49

Chapter 9.5.2 discusses the cumulative impacts on hazardous waste management, under the section heading "Human Health and Safety Hazards".

N23-50

Chapter 9.5.2 discusses the cumulative impacts on emergency evacuations under the section heading "Human Health and Safety Hazards".

Comments

Responses

N23-51

The cumulative effects in general would include effects on quantity and quality of groundwater, and on direction of flow, and are not expected to be significant. The project would slightly increase demand for potable water at SBMR, but the demand would be offset by lower demand elsewhere. The increased demand for water in the SBMR area will increase the rate of groundwater extraction, and will therefore increase the rate of remediation of the groundwater contaminant plume beneath SBMR. This will result in a beneficial impact on water quality beneath SBMR. Increased water use in the SBMR area will increase the amount of wastewater generated and treated, resulting in more treated wastewater being discharged to Kaukonahua Stream. This may result in a small increase in total dissolved solids in the stream.

However, the increase is not expected to be significant compared to background levels of TDS, and would be within the range specified by the NPDES permit for the discharge. Note for all Curtis and Brady comments asking for cumulative effect of future actions: The CI analyses are not intended to assess likely cumulative impacts of reasonably foreseeable future actions on resources but how a particular proposed action (s) will contribute to past, present, and likely future actions with a view forward when these impacts have reached a significance threshold.

The sole source aquifer is an administrative concept that provides additional protection of water quality in areas designated as dependent on groundwater for most of the potable water demand. As described above, the project will result in increased extraction from the Schofield groundwater area in the upper portion of the sole source aquifer. This is also the area of the TCE plumes from past industrial waste practices at SBMR. The remedy for the groundwater contamination is long-term groundwater extraction and above ground treatment to drinking water quality. Increasing the rate of pumping will likely increase the rate of remediation of the groundwater contamination plume, resulting in a beneficial impact on groundwater quality in the sole source aquifer over the long term.

N23-52

The following information and its implications is discussed in the EIS, in the Geological Resources, Water Resources, and Human Health and Safety sections. The Army is an EPA permitted large-quantity generator of hazardous waste. Installations routinely receive, store, and handle hazardous materials, and generate waste in the normal course of operations. The chemicals listed in the comment are just a few of many that have been

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identified through sampling, but they are of different origins. For example, iron, aluminum, manganese, thallium, and other metals are naturally occurring as well as man-introduced. Most of the detections of these compounds in soils from the PTA and SBMR ranges likely are due to background concentrations. Arsenic and lead are also naturally occurring, but in some cases the man-introduced concentrations exceed the background concentrations. Arsenic is a human carcinogen, and was found to be present at an average concentration (with 95 percent confidence) in the samples from the ranges that was about twice the industrial PRG. The carcinogenic risk associated with this concentration is within the EPA's acceptable range of 10⁻⁴ to 10⁻⁶ excess cancers. The observed concentrations of arsenic do not represent an environmental concern. Small residual concentrations of lead result from use of explosives and munitions. Lead bullets from live fire exercises and target training may be deposited on the ground. Over time, some of the lead dissolves and contributes to soil contamination. A few soil samples have been found to contain elevated concentrations of lead, but the average concentration in the samples (with 95 percent confidence) was well below the EPA industrial soil PRG. The Army is studying the conversion from lead projectiles to steel alloy projectiles (so-called "green" ammunition) in order to reduce the potential environmental hazards associated with lead. RDX and nitroglycerine are present as a result of explosives use. The concentrations in soils are low and do not present a significant hazard to humans or the environment. The Army explodes many tons of munitions, which deposit minute quantities of these explosives, and others. The dispersal of very small quantities of these compounds is the inevitable result of implementing the Army's training program. Explosives and munitions handling and use is performed by trained personnel according to standard operating procedures, and is not unique to Hawai'i. TCE is no longer in general use as a solvent, and its production and use have been greatly curtailed in the US since the 1980's. Existing TCE contamination of groundwater at SBMR resulted from past disposal practices and is currently being remediated as part of the EPA remedy for groundwater there. This is a long-term remedy, and the Army is committed to continuing it as long as necessary. Carbon tetrachloride is another chlorinated solvent, like TCE, that is no longer in general use. As for TCE and other contaminants in soils and groundwater that resulted from past practices, contamination is being addressed through the Army's Installation Restoration Program (IRP), which is the military equivalent of the EPA's CERCLA (Superfund) program. A large quantity of documentation is available to the public regarding the investigations and

Comments

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response actions performed in the IRP program. The program is ongoing. Other hazardous materials and hazardous waste are handled and disposed according to standard procedures developed by the Army for compliance with federal, state, and local requirements. Army policy states that the Army will comply with these regulations whenever possible. Requirements for hazardous materials and waste handling are generally covered under federal Resource Conservation and Recovery Act (RCRA) guidelines and regulations, which addresses a wide range of issues including design of storage and accumulation facilities, scheduling, reporting, inspections, training, etc. Inspections are regularly performed by the Army, and by the State of Hawai'i, which has been delegated authority by EPA to implement relevant RCRA programs.

N23-53

The soil investigation of the ranges did not rely on a small sample. In addition to sampling a large number of locations that were in areas of suspected contamination, and with visible evidence of disturbance by explosives or past disposal, the sampling methodology used composite sampling to ensure that any environmentally significant concentrations would be detected. Composite sampling has the disadvantage of not detecting low concentrations, but it is quite good at detecting high concentrations. Therefore, the methodology was well matched to the objectives of the investigation, which was to survey the ranges to determine if environmentally significant concentrations of contaminants were present. The concentrations were compared to the PRGs developed by the US EPA Region 9. These are conservative measures of the acceptable long term exposures to workers under an occupational exposure scenario. The exposure assumptions of the PRGs overestimate the exposures of soldiers who use the ranges.

N23-54

The locations were selected by the US Army Corps of Engineers investigation team, based on information provided by installation personnel. The sampling locations included impact areas, firing points, and disposal areas. The sampling locations were adjusted in the field to sample areas with visible evidence of potential contamination, such as munitions fragments, discoloration of soils, low topography in which runoff would collect. Some pre-selected areas were found not to be accessible. The word generally was meant to convey that specific sites thought high in contaminants were selected rather than using more random methods. The word "generally" has been replaced with "specifically".

Comments**Responses****N23-55**

Composite samples were collected within a 5-to-10 meter diameter circle or along a 15 to 25 meter linear transect by obtaining 10-30 increments of equal quantity.

N23-56

The samples were collected from areas believed to be representative of the highest risk of contamination on the ranges, based on knowledge of the ranges and visual evidence of soil disturbance, discoloration, etc. The intention was not to identify the highest individual concentrations of contaminants, but to identify the concentrations that would lead to exposures or to environmental risk. For example, in a composite sample comprising 10 subsamples, the maximum possible dilution of a high concentrations is by a factor of ten. However, if only one sample from among 10 subsamples taken from the same 10-meter diameter circle on a range contains a concentration exceeding the PRG, then the environmental significance of that one sample is not very high.

N23-57

They were collected from the surface. The objective was to identify contaminants that would either be transported by runoff, or to which military personnel would be exposed, or that might be transported in blowing dust.

N23-58

The analytical program was conducted according to the QA/QC plan developed for the investigation, and the results underwent a QA/QC audit. The samples were analyzed by EMAX Laboratory of Torrence California, a state-certified laboratory. All samples were analyzed within method holding times.

N23-59

All samples were tested for the same suite of analytes, which included RDX. The comparison tables in Appendix M include only the detected concentrations.

N23-60

All samples were tested for nitroglycerine and only those with detected concentrations were reported in Appendix M.

Comments

Responses

N23-61

Some sampling locations that were identified in the work plan were found to be inaccessible in the field.

N23-62

All samples were tested by EPAs Analytic Test 8270. Only those samples with detected concentrations were reported in Appendix M.

N23-63

All of the contaminants may be mobilized in air, water, or through other pathways (physical tracking on vehicles, boots or clothing). Different chemicals have different characteristics affecting their mobility, however. Some chemicals sorb relatively strongly to soil particles and others are more soluble in water and tend to dissolve and be transported in the dissolved state more readily.

N23-64

Appendix M-2 and M-3 describes the ATTAC model and the results. The ATTAC methodology quantifies the impacts of vehicles and training events in relation to a standard vehicle and event. This methodology is a generally accepted model for evaluating a vehicles impact on training areas.

N23-65

Chapter 9 addresses cumulative impacts of both contaminated sites and air emissions and there is more detailed information in the chapters 4 through 8 on specific contaminated sites and dust emissions. Chapter 9 for instance points out that there should be a decrease in petroleum, oils and lubricants releases and an increase in cleanup.

Letter
N24



Comments

P. O. Box 1520, Pahoa, HI 96778
(808) 965-9254

Responses

December 29, 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, HI 96858-5440

Dear Ms. Barger:

Comments on Stryker Brigade Draft E.I.S.

Thank you for the opportunity to comment on the Stryker Brigade Draft E. I. S. We would also like to thank the Army for its stated commitment to protect biological, cultural, and scenic resources on military lands, and to involve the public in the planning process. Malama O Puna is a Hawaii nonprofit corporation and 501c3 volunteer service organization which focuses on the environment. Our mission is to assure critical habitat for native species and open space for future generations through environmental education, hands-on projects, advocacy, watchdogging, and land trusting.

Our comments are divided into two parts: (1) General comments on the Draft E.I.S. and (2) specific comments and information regarding the proposed PTA land acquisition area here on the Big Island.

General Comments on the Draft E.I.S.:

N24-1

It is generally understood that the E.I.S. process normally proceeds in a programmatic way, with alternative project configurations proposed, followed by analysis of impacts for each alternative. Finally, an alternative is chosen that is most acceptable. If recent news reports are to be believed, none of the

N24-1

No presumption has been made as to the alternative to be selected. All alternatives are being considered equally. Once the Final EIS is published the selected alternative will be identified in the Record of Decision to be published in the Federal Register.

Comments

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N24-1 cont'd | proposed alternatives is being seriously considered. In view of that, alternative courses of action within the preferred alternative need to be much more fully detailed, and impacts analyzed in detail for these variations.

N24-2 | We are disappointed by the superficiality of the analysis of impacts on biological and cultural resources, including endangered species. Apparently very few new field studies were done for this E.I.S. and recent literature on biological and cultural resources is not cited for some of the areas to be affected. This is surprising, because the Army has ongoing programs for managing these resources.

N24-3 | According to the D.E.I.S. there will be significant impacts to biological, cultural, and scenic resources from implementation of the SBCT, but in almost every case the D.E.I.S. states that these impacts are mitigable to "less than significant". How the Army intends to mitigate these impacts is nowhere made entirely clear. The potential impacts, and the proposed mitigations for those impacts need to be fully described in detail in the E.I.S. In the Draft E.I.S., impacts to biological and cultural resources are analyzed only in general terms. The document refers to the Army's ongoing programs for resource management (e.g. ITAM) and essentially says that those programs will result in impacts to biological and cultural resources being mitigated. Given the military's recent requests to congress to be exempted from federal environmental rules, we view these assurances with some suspicion.

N24-4 | We believe that the final E.I.S. must address potential impacts to important resources in greater detail. In some cases, new field studies should be carried out. In all areas much greater detail concerning proposed actions, resources, impacts, and mitigations need to be given. Impacts on endangered species need

N24-5 | to be detailed in terms of where, when, and how they will occur, how populations of individual species will be affected, what those effects mean in terms of the endangerment of each species so affected, and finally, details of how these

N24-6 | effects will be mitigated. Actions and impacts that may adversely affect cultural resources also need to be described in more detail together with details of how

N24-7 | these effects will be mitigated. Many details are also missing from the analysis of impacts on visual or viewshed resources.

Responses

N24-2

Data from past field studies and current field studies were used in the preparation of the EIS. These studies are referenced in chapters 5.10 and 11, 6.10 and 11, 7.10 and 11 and 8.10 and 11 – Biological Resources and Cultural Resources respectively.

N24-3

The FEIS has been revised to recognize that there are potential significant impacts to biological and cultural resources that may not be mitigated to less than significant levels. Mitigation measures likely to occur are outlined in the Executive Summary. These proposed mitigation measures were included for public comment. The Army reviewed the measures based on public comments and the benefits of each measure to reduce impacts. The Army has listed those mitigation measures that are high priority and those that are unlikely to occur because of limited resource, unfeasible or there are similar measures already in place. The ROD will indicate which mitigation measures will be implemented.

N24-4

Data from past field studies and current field studies were used in the preparation of the EIS. These studies are referenced in chapters 5.10 and 11, 6.10 and 11, 7.10 and 11 and 8.10 and 11 – Biological Resources and Cultural Resources respectively.

N24-5

Impacts to individuals and populations of sensitive species and habitats are discussed in chapters 5.10, 6.10, 7.10, and 8.10.

N24-6

Specific actions are described in Ch. 2, and specific cultural mitigations are described in the PA.

N24-7

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

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Specific Comments on the PTA Land Acquisition Area.

1. The only new survey (for this EIS) of biological resources in the West PTA Acquisition Area we could find in the draft document was the mention on page 8-117 (Volume 2) of "Biological surveys in spring 2002". These surveys found five (5) federally designated plant species. In fact, studies carried out by the Corps of Engineers have documented seven (7) federally designated plants (and another probably extinct plant) in the West PTA Acquisition Area. No other details about these "Biological surveys" are given and no reference to any literature is cited.

N24-8

Other recent surveys of biological and cultural resources in the West PTA Acquisition Area are not referenced. The Corps of Engineers has been conducting surveys for endangered plants and animals as well as compliance monitoring in the Waikoloa Maneuver Area (which includes the acquisition lands) for over five years. Almost none of this information is referenced, even though it contains detailed descriptions of natural resources, particularly wildlife and plants in the acquisition area.

We are also very concerned about the statement on p.8-141 that up to 88% of the *Haplostachys haplostachya* in the West PTA Acquisition Area could be destroyed by off-road vehicle maneuvers, and that populations of *Stenogyne angustifolia* and *Vigna o-wahuensis* could also be adversely affected. A section 7 consultation with USFWS is being carried out, but no details of impacts or any real mitigation plans for these impacts are presented in the Draft .

N24-9

2. Recent work by the Hawaii Department of Land and Natural Resources on endangered plants in the acquisition area is not referenced.

N24-10

3. Recent work by the U.S. Fish and Wildlife Service on endangered plants in proposed critical habitat areas in the West PTA Acquisition Area is referenced in the bibliography, but no discussion is included in the text of the Draft. The map of proposed USFWS critical habitat areas in the acquisition lands (Figure 8-30 p.8-134) is very unclear. Apparently Pu'u Nohona o Hae is shown, but it is unclear whether Pu'u Papapa is. USFWS proposed both Pu'u Nohona o Hae and Pu'u Papapa in the acquisition area as critical habitat for endangered plants, but removed both areas in their final rule because the Army is acquiring the area and does not want critical habitat designations on military lands. Prior to this

N24-8

This information was provided and incorporated into the text in section 8.10.

N24-9

This information was provided and is now included in the section.

N24-10

This information was provided and incorporated into the text into section 8.10.

Comments

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December 29, 2003

N24-10 cont'd | time, botanists regarded both pu'u as extremely valuable areas for endangered plants. No mention is made anywhere in the Draft E.I.S. of the botanical significance of these areas, even though they meet the criteria stated in the Draft E. I. S for "biologically significant area" (BSA).

N24-11 | Not only are botanically significant areas in the PTA acquisition lands no mentioned in the Draft E.I.S., but also details regarding specific impacts to these areas are sketchy at best. We are told on p. 8-4 that about 28 miles of roads will be constructed in the West PTA Land Acquisition Area and that the Army will comply with all environmental regulations, but we can find no description of proposed surveys for endangered plants or proposed management actions, other than the overall fire management plan, for protecting endangered plant resources in these areas.

N24-12 | Communications facilities are proposed for several of the pu'u in the West PTA Acquisition Area. Construction details are insufficient to fully evaluate effects on native plants or communities. Again, no biological or botanical surveys are described or proposed in connection with the construction of these facilities. Because the pu'u in the West PTA Land Acquisition Area are important areas for endangered plants, the final E.I.S. should describe surveys for endangered plants and other biological resources that should be conducted prior to construction. We would also like to see a recognition in the E. I. S. that some of the pu'u in the area are not suitable for communications facilities, nor training exercises, because of the severity of impacts on biological, cultural, and visual resources.

Descriptions of botanically significant areas in the PTA Land Acquisition Area and lists of the endangered plants that occur in these areas can be found in Palmer & Paul (2003) "Botanical Survey of the Waikoloa Maneuver Area" U. S. Army Corps of Engineers, Pacific Ocean Division, Honolulu, Hawaii. Additional information on these sites can be found in USFWS 50 CFR Part 17 "Endangered and Threatened Wildlife and Plants; Designations of Critical Habitat for Plant Species from the Island of Hawaii, HI; Proposed Rule" Federal Register, Tuesday May 28, 2002 36967-37106.

N24-13 | 4. Without more detailed descriptions of actions and impacts, there is no way to evaluate the adequacy of proposed mitigations, which are also given in very general terms. To adequately mitigate (little mention is made of "prevent") impacts to endangered plants in the PTA Land Acquisition area up to date field surveys must be done in those areas known to be botanically significant. Details

N24-11

Information regarding the acquisition lands was incorporated in the report. The measures outlined in the 2003 BO for Hawai'i describes the additional mitigation measures and surveys planned for Hawai'i. Environmental regulations are included in Appendix N.8.

N24-12

Information regarding the acquisition lands was incorporated in the report. The measures outlined in the 2003 BO for Hawai'i describes the additional mitigation measures and surveys planned for Hawai'i. The pu'us in the Palmer report are included in buffer zones of activity as determined through Section 7 consultation.

N24-13

The results of Section 7 consultation include development of an Pōhakuloa Implementation Plan funded by the Army which addresses some of your concerns about the endangered species at PTA. The individual measures determined in Section 7 to mitigate from Army actions are outlined in the biological resource section of chapter 8.10

Comments

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N24-13 cont'd | of proposed training activities that might impact these areas must then be set forth, an analysis of significance made, and mitigations developed.

N24-14 | 5. On pages 8-104 and 8-105 in the discussion on soil erosion resulting from the preferred alternative it is pointed out that the Army's ATTACC modeling of training intensity of the SBCT indicates that the land condition will deteriorate to a "severe" condition in terms of denudation of vegetation and severe soil compaction and erosion. We are very concerned about this, because, as pointed out in the Draft, revegetation efforts at PTA have so far not been very successful. This also means that botanically important areas would need to be protected from off-road vehicle maneuvers. Although these impacts are considered significant, mitigations are discussed in only general terms.

N24-15 | 6. The vegetation map in Figure 8-27 (p. 8-116) is overly generalized for PTA and is inaccurate for the West PTA Acquisition Area. The Draft refers to Shaw and Castillo (1997), and states that 24 vegetation types occur on PTA. This is not reflected in Figure 8-27. We assume that the West PTA Acquisition Area is shown as "nonnative" in the figure because of the extensive fountain grass invasion. This obscures the presence of botanically significant areas in the WPAA.

N24-16 | 7. We are also concerned that the numerous archeological features identified in the West PTA Acquisition Area will be obliterated by Stryker maneuvers. The proposed mitigations (p. 8-180) do not seem sufficient to prevent the eventual loss of most of these features given the proposed intensity of Stryker training.

In summary, we think that the Draft E.I. S. could be significantly improved by giving more specific information concerning impacts and mitigations, particularly for biological and cultural resources. We also feel that the information presented in the Draft E.I.S. for biological and cultural resources in the WPAA is incomplete and, in the case of biological resources, inaccurate and misleading because it fails to clearly identify biologically significant areas and endangered species in the WPAA. We are also concerned with the internal inconsistency of one analysis showing a predicted deterioration of land condition to "severe" while another indicates that impacts to endangered plants and cultural resources can be mitigated to less than significant.

Thank you,

Malama O Puna

N24-14

Mitigation measures will be finalized in the ROD. However, measures identified by USFWS and the Army in the Biological opinion for Hawai'i have already been finalized and included in section 8.10.

N24-15

Botanically significant areas are discussed in the text of chapter 8.10. The map is only intended to give the reader a general idea of the vegetation in the ROI. Individual sensitive vegetation species locations are provided for more specific information on Figure 8-28.

N24-16

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. Avoidance and mitigation measures have been developed as described in the PA. The Final PA as signed by the Army, SHPO, ACHP and concurring parties is included in Appendix J of the Final EIS.

Comments

Responses

Letter N25 Cindy Barger, SBCT EIS Project Manager
US Army Corps of Engineers
Honolulu District Bldg. 230 Rm 306
ATTN: CEPOH-PP-E
Fort Shafter, Hawaii 96858-5440

January 2, 2004

Dear Ms. Barger:

Enclosed are the following to be made part of the record for the Stryker EIS

- 1. Copy of my written testimony given at the Waikoloa Beach Hotel, Nov. 5, 2003 hearing.
- 2. Copy of my written testimony given at the Hilo Hawaiian Hotel Nov. 6, 2003 hearing.
- 3. Copy of a Big Island map entitled "Sites NOT for Tourists or Locals concerning 57 known Military Hazard areas on Hawaii Island in need of military clean up before any military expansion plans should even be considered. Some documents are still classified after 40 years concerning secret testing of chemical and biological agents in Waiakea Forest. Declassify those documents. It's time for the military to come clean on its past dirty deeds.

In addition to the above I want to pose the following questions or areas for further investigation that should be addressed in the final EIS.

N25-1 1. **The Stryker EIS needs to seriously consider many possible alternative locations for a Stryker Brigade besides Hawaii**, notwithstanding the Pentagon's decision to base a Stryker Brigade in Hawaii before the draft EIS process is even completed. The lack of seriously investigated alternative sites is a serious deficiency of the draft EIS. Please investigate site locations along the West coast of the U.S., sites in New Mexico, Arizona, Texas, etc. where wide open land space is more available than on small Hawaiian islands. Should not a project of this magnitude have at least 10 seriously studied alternative sites?

N25-2 2. **The area of cumulative impact of past military activity on Hawaii Island needs to be addressed as evidenced by the attached map listing 57 known military hazard areas totaling hundreds of thousands of acres in need of military clean up from live arms and other military toxins.** In

N25-1

As discussed in section 1.6 of the FEIS the ROD for the Programmatic EIS directed the 2nd Brigade, 25th Infantry Division (Light) at Schofield Barracks, Hawai'i to transform to an SBCT. The Commanding General of the 25th ID (L) is charged with deciding how best to achieve that directive and provide for military training, readiness, and facility requirements to meet SBCT transformation needs, while enabling the current forces to continue to carry out their missions and giving due consideration to environmental factors. This decision will be based on the results of this EIS, and on consideration of all relevant factors including mission, cost, technical factors, and environmental considerations. This EIS considers a reasonable range of alternatives including several alternatives that involve transforming and/or training on the U.S. mainland. As discussed in Section 2.6, the mainland alternatives were not analyzed in detail because they did not meet the purpose and need of the proposed action. (Complete details on the proposed action are presented in Chapter 2 and Appendix D.)

N25-2

Quantitative information on unexploded ordnance left during the past century is not available. It is not known what the commenter means by "military toxins." The EIS has been revised to contain analyses of cumulative impacts considering other military projects and astronomy activities at Mauna Kea (Hawai'i projects #1-4, 8-11 and 12). Although specific clean-up costs are unknown at this time, the Army is committed to cleaning up existing sites in accordance with applicable laws and regulations.

Comments

Responses

May 2004

Stryker Brigade Combat Team Final EIS, Hawai'i

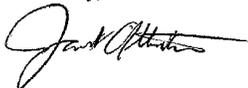
P-250

N25-2 cont'd addition the cumulative impact of C-17 military aircraft associated with the Stryker Brigade, impacts at Kawaihae harbor, the impact of increased astronomy and military training on the sacred mountains of Mauna Kea and Mauna Loa need to be addressed. Live arms fire at PTA is expected to increase from 7.1 to 14.8 million live rounds annually. How does this affect expected clean up cost when PTA is eventually returned to the State or nation of Hawaii? In light of the military's past failure to clean up sites, should not bonding be required to ensure present clean up?

N25-3 3. Appendix M-1 of the Stryker EIS acknowledges Beryllium and lead in soil samples taken at Pohakuloa Training Area. No soil samples were taken in the impact area. Why? I believe soil samples should be taken in the impact area to know the impacts. Please have samples taken. In addition, personal sampling needs to be done of military people who have been involved in training at PTA to check for lead or Beryllium exposure. Personal sampling should also be done in civilian areas (i.e. girl scout camp nearby, Waikii ranch, Waikoloa town, Waikoloa resorts and Hilo residential areas. Sampling should also be done along Saddle road to check for civilian exposure while traveling Saddle road. After all signs are posted along Saddle Road which read "Live fire overhead!" I have received a copy of written EIS testimony provided by Mr. Rollin Frost, a professional in metal toxics with a background working for OSHA and occupational health. I support his call for further testing/sampling,

N25-4 4. Investigate reports of live ordnance buried at various spots including just below the Girl Scout Camp west of Pohakuloa Training Area. Investigate
N25-5 burial sites in the path of the 40 foot wide tank trail from Kawaihae Harbor to
N25-6 PTA. Investigate impact of heavy Stryker vehicles to the structural integrity
N25-7 of the Pu'ukohola Heiau. What is the impact of Pohakuloa Stryker dust on Mauna Kea astronomy?

Sincerely,



James V. Albertini, President
Malu `Aina Center For Non-violent Education & Action
P.O. Box AB Kurtistown, Hawaii 96760
Phone 808-966-7622 ja@interpac.net www.malu-aina.org

N25-3

All samples were analyzed by the same analytical methods. Beryllium was analyzed in all samples, including samples from impact areas. The table in Appendix M includes only detected concentrations. Inhalation of beryllium metal can present an occupational health hazard due to sensitivity of some individuals to very low levels. These effects would not be unique to the Army in Hawai'i, but could affect military personnel anywhere involved in the same activities. It has not been established that the beryllium detected in the soil samples results from beryllium present in munitions or in the metal tubing used in munitions or rockets, although there is a high likelihood that beryllium is present in these materials. Beryllium is also naturally present in the environment, as a constituent of some minerals, and it is present in many consumer products. The beryllium concentrations detected on the ranges were compared to US EPA Region 9 PRGs, which are conservative health-based concentrations established for screening level analysis to determine if the potential for a significant human health exposure exists. The beryllium concentrations observed in soils at the ranges at SBMR and PTA were well under the industrial soil PRGs. The only exposure that might impact offsite civilian receptors would be exposure to windblown dust. Such exposures would be negligible at the boundary of the installations.

N25-4

There are no records of buried live ordnance on PTA lands west of the Girl Scout Camp.

N25-5

The Army is conducting this investigation.

N25-6

The trail has been in use for a number of years and no impacts from this use have been recorded.

N25-7

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 down slope, away from the observatories. Strong winds from the southwest can occur, but these situations may create other atmospheric conditions that are not ideal for observatory operations. A discussion has been added to Section 8.3 - Visual.

Comments

Responses

Stop the Stryker Invasion! No More Country Club/Hotel Public Hearings!

Tonight I would like to focus on the shamefully flawed military Stryker Environmental Impact Statement (EIS) process. Tomorrow night in Hilo I will speak more to the substantive destructive nature of the Stryker invasion. Let me preface my remarks and questions by saying that I want written answers to my questions provided directly to me by the Army and to be included in the final draft of the EIS.

Right from the beginning of the EIS, the process was flawed. Private, by invitation only, winning and dining of politicians and business people at the exclusion of the public; conducting tours of Pohakuloa for political and business people while canceling at the last minute a tour by Hawaiians, environmental, and grass root community leaders, saying CERTAIN UNNAMED MEMBERS of the delegation were unacceptable because of their outspoken criticism of the military. Having exclusive private country clubs and luxury hotels as settings to intimidate and distance ordinary people from participating in the process. Using police and hotel security as a military fence to block and arrest citizens from attending public hearings because they peacefully carried protest signs. The banning of signs as a peaceful expression of free speech testimony at the first of six EIS public hearings tainted the entire public hearing process with a chilling effect on expression.

N25-8

Just yesterday I spoke at a University of Hawaii class and scared students asked --will we be arrested if we go to the hearings? Just yesterday, a Hilo police captain called my home and asked a member of my household if "Mr. Albertini was planning on being arrested at the Stryker hearings?" What kind of a message is that? I have been informed by a federal worker that many federal workers are afraid to get involved and speak out on the Stryker issue, or even be seen at public hearings like this. They fear they could lose their jobs just by being here. What kind of working environmental impact is that? Hotel security left a message on my answering machine that anyone carrying a protest sign should not enter this hotel through the main lobby but go through the loading dock. What kind of an insult is that? Reminds me of blacks not being allowed to enter restaurants to eat but having to go around to the back kitchen door to eat. I left a message on the hotel security message phone that such a request was insulting and demeaning and I would not be a party to it.

So what has been accomplished by the Army's attempt to privatize public hearings and ban signs at public hearings? I have a few observations.

1. The Army exposed and demonstrated its contempt for dissent and trampled on the very constitution it has sworn to protect, did it not?
2. The Army exposed and demonstrated its complete lack of understanding and respect for citizen constitutional right of peaceful expression and right to assemble, did it not? Even the Governor told you that the hearings should have been held in schools.
3. The Army provided unintended publicity on free speech issues and the Stryker EIS hearings, did it not?
4. The Army caused a chilling environment of fear in the community for people to even attend these hearings, did it not?
5. The Army, by banning silent peaceful expression of protest by signs, provoked a climate for verbal protest and confrontation, did it not?

Through all of the above, the Army so tainted the environment for open public participation that the entire process of public hearings should be redone during the now extended comment period. And the

N25-8

We thank you for your comment and understand your concern. It was not the intent of the Army to restrict the public through the format and location of the public meetings. Once the issue arose, we worked to correct the situation by working with the other facility locations to allow signs in the actual meeting rooms and provide tables for members of the public to display signs and information. In addition, we worked with the facilities and the City and County of Honolulu prosecutor to have all charges dropped against the individuals involved in the situation. Through these measures and the extension of the public comment period, we believe we allowed sufficient venues for public input including ample opportunity for written comment.

Comments

N25-8
cont'd

public hearings should be held in public community centers or school facilities. There were four hearings held on Oahu. Oahu is smaller than the Puna district of this island. There should be at least five hearings on this island. One in Hilo, one in Kailua-Kona, one in Waimea, one in Puna and one in Ka'u. And if the people of Hamakua and North Kohala also want hearings, so be it. Have more hearings. After all, it's your job to listen to the people that pay your salaries. That includes all the people not just your invited dinner guests who support your pork barrel project because they get to feed at the trough.

The Hawaii Stryker Brigade proposed budget is \$1.5 billion. That's what it costs to run the entire Hawaii public education system for two years. Ask the people of Hawaii what they'd rather -- a Stryker Brigade or a doubling of the State's school budget for the next two years? Let me know what answer you get please.

N25-9

I have another question but I want to preface it. Many people believe the Hawaii Stryker Brigade is a done deal. That these hearings are a fraud, a façade to give the appearance of listening to the people when the decision has already been made. Dan Inouye has said he's been assured of the Stryker Brigade. He's already pushed through Congress over \$80 million in support of the Hawaii Stryker. Here's my question: Why is it that the military gets all the money and land it wants and Hawaiians die on a waiting list to get what is rightfully their own home land, much of which is being occupied and bombed by you?

Now I have a few "foot in mouth" presentations to make:

To Major Stacy Bathrick for her Oct. 29th comments in the Honolulu Star-Bulletin:

"The Army won't allow any demonstration or protest involving banners or signs carried into the meeting room."

Col. David Anderson who said banning signs was done out of concern for potential damage to facilities. Sign carrying protesters could be disorderly.

Troy Griffen who said the protesters "agenda is to break up the meeting."

Let me say this: To Major Bathrick --It's the Army's job to uphold not suppress the constitutional rights of citizens. To Col. Anderson --Be more concerned about the damage and disorder your Strykers will do to Hawaii and other places around the world.

To Troy Griffen --my agenda is to break up nothing. Breaking up is what Strykers do. My agenda is to get you and the U.S. military to clean up your opala on the more than 400 square miles of Hawaii Island, the equivalent of 9 Kaho'olawe, littered with a toxic stew of unexploded ordnance, chemicals, and biological agents from current and past military training. Enough is enough. It's time for clean-up NOT Build-up.

The first step in clean up is to properly identify and caution people about the dangers of your opala. Our Malu Aina organization is hereby donating to you the first, of what I hope will be hundreds of signs made by you and placed around present and former bombing ranges and other hazardous military sites on our island. By the Army making these signs it will be a positive step forward after trying to ban signs from these hearings.

It's time to stop the Stryker invasion now. Clean-up NOT Build-up. This is my agenda!

Aloha,

James V. Albertini, President, Malu 'Aina Center For Non-violent Education & Action
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N25-10

Responses

N25-9

Although Department of Defense, Department of the Army, and Congressional representatives have issued statements that the 2d Brigade, 25th ID(L) will transform to a Stryker Brigade, these statements refer to programmatic level decisions necessary to continue the planning, funding and assessment processes for the proposed transformation efforts and set the conditions for implementing an action once a final decision has been made. The final decision on whether the 2d Brigade, 25th ID (L) will transform to an SBCT will be made by the appropriate local commander, subject to environmental assessment and other appropriate reviews and compliance with applicable federal law. The Department of the Army issued a Programmatic EIS for Army Transformation in 2001, and issued its Record of Decision to implement Army Transformation on April 11, 2002. In that ROD, Lieutenant General David McKiernan confirmed a series of previously announced conversions of 6 brigades to interim brigade combat teams, "subject to appropriate evaluation of potential environmental effects in accordance with the National Environmental Policy Act" (ROD, page 11). The Department of the Army will make a decision whether or not to transform the 2d Brigade, 25th ID(L) in Hawai'i only after a full consideration of all the environmental impacts identified and analyzed under NEPA, weighed equally with considerations of strategic importance, military training and readiness, technical considerations, economic and fiscal considerations, and other considerations mandated by law or policy.

N25-10

During the scoping meetings, the public facilities would not allow the meetings to extend beyond 10:00pm. This time restriction required that members of the public keep their oral comments short. After many public comments about the length of the meetings, and in an attempt to allow for full participation of all people present, the Army decided to hold the Draft EIS public meetings at private facilities where the facility was open as long as the Army needed. The majority of the Draft EIS public meetings did not conclude until after 12:00am.

At the first two meetings Honolulu Police Department arrested a total of seven people for trespass when they attempted to enter the facilities with signs. All individuals were advised that they were welcome to enter the facilities without the signs.

It was not the intent of the Army to restrict the public through the format and location of the public meetings. We corrected the situation by working with

Comments

Stop the Stryker Invasion! Cancel the Hawaii Stryker Brigade here and now! Thursday, Nov. 6, 2003 by Jim Albertini at the Hilo Hawaiian Hotel

Before I begin, let me preface my remarks and questions by saying that I want written answers to my questions provided directly to me and to be included in the final or future drafts of the EIS. The present EIS draft has failed to address many of the questions I asked at the scoping hearings.

In Kanaka Maoli tradition we are entering the Makahiki season -- a time for thanksgiving and peace. I am very thankful for all the people, especially Kanaka Maoli who spoke at the Stryker hearing last night at the Waikoloa Beach Marriott Hotel. Last night's hearing was an extremely moving experience. The large and powerful turnout and testimony lead by Kanaka Maoli kuptuna, makua, and opio speaking on behalf on their ancestors, their ohana and the aina to stop military expansion, cleanup the existing military opala and return the land to the sovereign Nation of Hawaii was as we say "chicken-skin." The testimony of non Kanaka Maoli was also very moving. In all, a total of about 40-50 people testified and only about 4 spoke in support of the expansion. From what I have read and heard, this is how the other hearings have been going as well --people overwhelmingly opposed to military expansion despite the climate of fear created

Last night I spoke about the shamefully flawed military EIS process --the private, by invitation only, wining and diming of politicians and select business people, at the exclusion of the public; conducting select tours of Pohakuloa for political and certain business people, while canceling at the last minute a tour by Kanaka Maoli sovereignty leaders, environmental and grass root community representatives, saying certain unnamed members of the delegation were unacceptable because of their outspoken criticism of military expansion; having exclusive private country clubs and luxury hotels as settings to intimidate and distance ordinary people from participating in the process; using police, private security firms and hotel security as a fence to block and arrest citizens from attending public hearings because they peacefully carried protest signs. The banning of signs as a peaceful expression of free speech testimony and arrests at the first two of six public hearings tainted the entire public hearing process with a chilling effect on participation and expression.

On Tuesday, I spoke to a class at the University of Hawaii at Hilo and scared students asked --"will we be arrested if we go to the hearings?" What kind of a climate is that for a university and a community? On Tuesday, a Hilo police captain called my home and asked a member of my household if "Mr. Albertini was planning on being arrested at the Stryker hearing?" What kind of a message is that? Several federal workers told me that they are afraid to get involved and speak out on the Stryker issue, or even be seen at public hearings like this. They fear they could lose their jobs just by being here. What kind of a working environmental impact is that? Earlier in the week, a Waikoloa Beach Marriott Hotel security officer left a message on my home answering machine that anyone carrying a protest sign should not enter their hotel through the main lobby but go thru the loading dock. What kind of an insult is that? Reminds me of blacks not being allowed into restaurants and told to go around to the kitchen door to eat. I left a message on the Marriott security message phone that such a request was insulting and demeaning and I would not be a party to it. Fortunately the Marriott backed off of its back-door position but even their handout in the parking lot to everyone attending the hearing said: "picketing, sign waving, chanting, or any other public displays of protest is NOT allowed on any part of the premises of the hotel --including, but not limited to the lobby, in front of the property, or the beach front."

So what has been accomplished by the Army's attempt to privatize, ban signs and chants, and arrest people holding signs at public hearings?

1. The Army exposed and demonstrated its contempt for dissent and trampled on the very constitutional it has

Responses

the other facility locations to allow signs in the meeting rooms and provide tables for members of the public to display signs and information. In addition, we worked with the facilities and the City and County of Honolulu's prosecutor and all charges were dropped against individuals involved in the situation. All of the individuals who were arrested had the opportunity to participate in subsequent meetings and most of them attended and provided public comment.

Comments

sworn to uphold and protect.

2. The Army showed its complete lack of understanding and respect for citizens constitutional right of peaceful expression, right to assemble, and right to petition government for a redress of grievances.
3. The Army provided unintended publicity on free speech issues and the Stryker EIS hearings.
4. The Army caused a chilling environment of fear in our community for people to even attend these hearings.
5. The Army, by banning silent peaceful expression of protest by signs, provoked a climate for verbal protest and confrontation.

Through all of the Above, the Army, Honolulu Police Dept., Royal Guard Security Company, Honolulu Country Club, Helemano Plantation, Hawaii County Police Dept., Waikoloa Beach Marriott hosting these public hearings so significantly tainted the environment for open public participation that the entire process of public hearings should be redone. The climate of duress created for these public hearings is evidenced by university students asking --"will I be arrested if I go to the public hearings?"

Public hearings should be held in public facilities --community centers and schools. Even Governor Lingle told you this. The biggest land impact in your Stryker proposal is here on Hawaii Island -- a 23,000 acre expansion at Pohakuloa, yet you only scheduled two hearings on the entire island. Oahu had four hearings and all of Oahu can fit inside the Puna district. There should be a minimum of five hearings on Hawaii Island: one in Hilo, one in Kailua-Kona, one in Waimea, one in Puna and one in Ka'u. And if the people of Hamakua, North Kohala and other areas want public hearings too, so be it. After all, you said you want to hear the concerns of ordinary people, isn't that right? Not just the concerns of your "by invitation only" politician and select business dinner guests who support your pork barrel project because they get to feed at the trough.

The Hawaii Stryker Brigade proposed budget is \$1.5 billion. That's what it costs to run the entire Hawaii public education system for two years. Ask the people of Hawaii what they'd rather -- a Stryker Brigade or a doubling of the State's school budget to educate our children for the next two years? Let me know what answer you get please.

I have more question but I want to preface them. Many people believe the Hawaii Stryker Brigade is a done deal. That these hearings are a fraud, a façade to give the appearance of listening to the people when the decision has already been made. Dan Inouye has said he's been assured of the Stryker Brigade. He's already pushed through Congress over \$80 million in support of the Hawaii Stryker., when the drat EIS hasn't even been completed. Isn't that putting the cart before the horse? I want to know who assured Dan Inouye of a Hawaii Stryker Brigade? More questions: Why is it that the military gets all the money and land it wants and Kanaka maoli die on a waiting list to get what is rightfully their own home land, much of which is being occupied and bombed by the U.S. military?

I have been made aware of a shocking and damning new Army recruiting ad that shows an Army engineer blowing up Pohakuloa. What's the message you are trying to convey to young recruits by that ad?

N25-11

Lets follow the money trail of this corrupt Stryker boondoggle. Dan Inouye and Ted Stevens of Alaska, sit on the powerful senate military appropriations committee. Any wonder Hawaii and Alaska are sites for Stryker Brigades. The Stryker is the baby of Hawaii recently retired Army General Eric Shinseki. Shinseki, rumored to want Dan Inouye's senate seat, was the Army's top General for 4 years. The auditor of the Stryker program just happened to be a 4 year classmate of Shinseki's at West Point. One of Shinseki's right hand men was General Dave Heebner who retired (early) from the Army but immediately got a job as Vice President of General Dynamics to seal the Stryker deal for General Dynamics with the Army. Heebner had his Army pension sweetened by over 13,000 shares of General Dynamic stock and I'm sure other perks that have not been made

Responses

N25-11

The tentative decision to field one of the six Stryker Brigades in Hawai'i was analyzed in the Programmatic Environmental Impact Statement for Army Transformation and announced in the Record of Decision of April 2002. A full set of alternative sites at various Army installations were examined. The Hawai'i EIS is tiered to the PEIS and examines the details of fielding at locations in Hawai'i. The alternative of not fielding a Stryker Brigade in Hawai'i (the no action alternative) was also examined in detail. Both documents have been made available to the public for comment as required by CEQ Regulations in order to insure that an informed decision could be made.

Comments

Responses

N25-11 public. This is probably only the tip of the iceberg.

cont'd

When dealing with the military, money and power, much is often hidden. Take for instance the secret chemical, biological and nerve gas testing in Hawaii's past. The military lied to us about it. They said they were doing weather testing. When the secret testing was finally confirmed, the military acted like they were doing us a favor by telling us that they poisoned us and the aina. Can the military be trusted today? It's track record is not good. The military has more than 50 current and former sites on this island alone of military opala in need of clean up.

N25-12

It totals more than 400 square miles, the equivalent of nine Kaho'olawes, littered with a toxic stew of unexploded ordnance, chemicals, and biological agents from current and past military training. Enough is enough. All of our mothers have taught us to clean up after ourselves. Don't even think about making a new mess until you have cleaned up your old mess. The Army Corps of Engineers says at present funding levels it will take centuries to clean up the opala on military sites in Hawaii. Yet somehow, amid budget constraints for clean up, the Army has found the funds to clean unexploded ordnance from its new 30 mile tank trail from Kawaihae to Pohakuloa. This is not acceptable. You can clean up tank trails of unexploded ordnance, but places where people live, work and go to school. A'ole! Your mother, all of our mothers, and the mother of us all, are telling you to clean up not build up. No military expansion in Hawaii. No Stryker Brigade.

Col. Anderson, you appear to be a man of integrity. I ask you to act on that integrity. Stand up here and now and say at this hearing, based on the overwhelming testimony you have heard throughout Hawaii, that you will recommend that the entire Hawaii Stryker Brigade project be cancelled and put in the scrap heap of history. And that furthermore, as a first step toward cleaning up and returning current and former military lands to the nation of Hawaii you will immediately begin to place thousands of signs such as these around present and former bombing ranges and other hazardous military sites on our island to simply alert people. The sign reads: Caution - Former Military Site -- Live Arms Hazard! By the Army making and posting signs such as these it will be a small, but positive, step forward after trying to ban signs from these hearings. Mahalo and aloha. Malama pono! Malama I ka aina!

James V. Albertini, President, Malu 'Aina Center For Non-violent Education & Action
P.O. Box AB Kurtistown, Hawaii 96760(Ph 808) 966-7622 Email ja@interpac.aer www.malu-aina.org

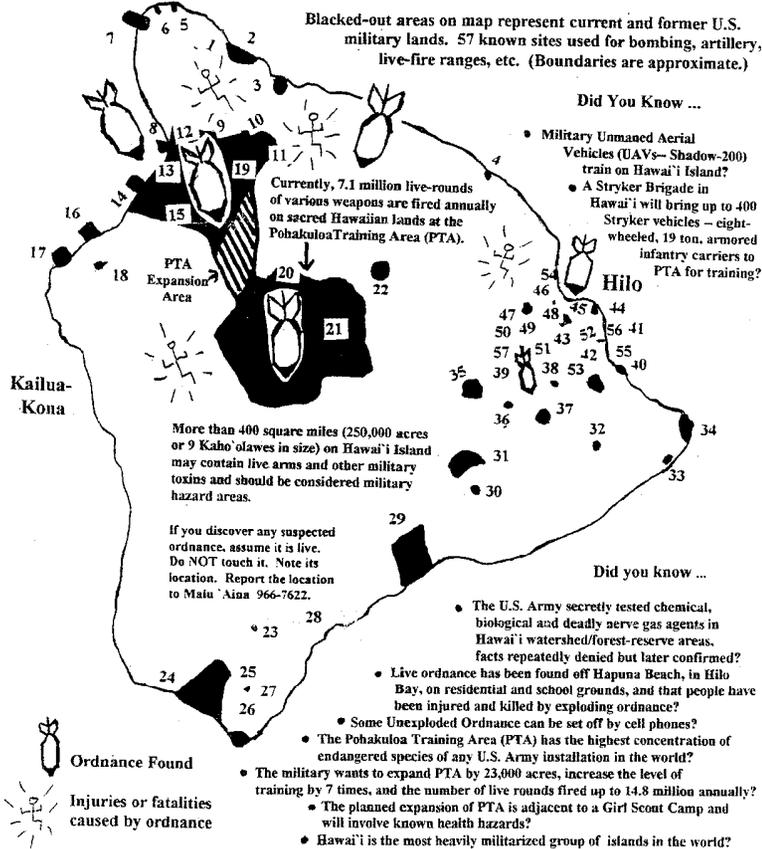
N25-12

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. Chapter 4.12 of this document discusses the methods assessed in evaluating potential impacts to human health and safety hazards from the proposed action. As discussed in this section, the Army has determine that the general public or soldiers would not experience any significant health impacts as a result of this proposed action. The Army abides by and will continue to abide by all appropriate laws and regulations in conducting appropriate toxicology studies and implementing appropriate measures to protect the health of the community. The U.S. Army Center for Health Promotion and Preventive Medicine assists in this compliance with a mission to provide worldwide technical support for implementing preventive medicine, public health, and health promotion/wellness services into all aspects of America's Army and the Army Community anticipating and rapidly responding to operational needs and adaptable to a changing world environment.

Comments

Responses

Sites NOT for Tourists or Locals! Military Hazard Areas on Hawai'i Island



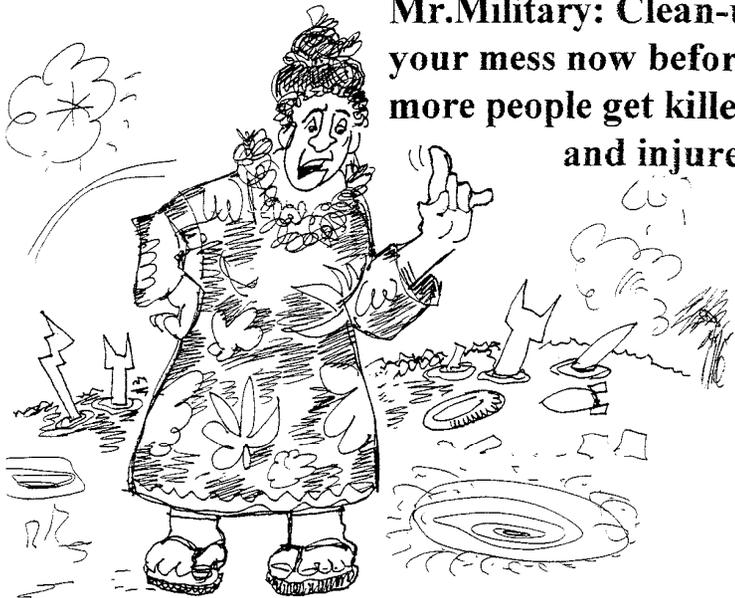
Military Clean-Up NOT Build-Up!

contact: Malu 'Aina Center For Non-violent Education & Action
P.O. Box AR Kurtistown, Hawai'i 96760 Phone: (808) 922-7522

Letter
N26

NO POHAKULOA EXPANSION!

**Mr. Military: Clean-up
your mess now before
more people get killed
and injured**



The biggest military land-grab in Hawai'i since WWII is about to take place under the name of "Army Transformation." We need your help to stop it. The military wants 23,000 more acres on Hawai'i Island to add to its 108,793-acre Pohakuloa Training Area (PTA), located in the saddle between Mauna Kea and Mauna Loa. Help us say to the military: "Clean-Up NOT Build-Up." There are more than 50 former and ongoing military sites on the island. Hundreds of thousands of acres are littered with unexploded bombs and toxins from conventional weapons training and secret chemical and biological weapons testing. Military hazards are present on our lands and in our waters. Tides expose munitions buried in the sand off Hapuna Beach, Hilo Bay and other areas. Last year several live grenades were found by school children in a Waimea Middle School garden. Get involved to clean-up and make our island a safe place. Make copies of this flyer, circulate and post them. Arrange for community/house meetings to discuss the issues. Speak out. Write letters to the editor. Call public officials. Mahalo.

N26-1

For more information, please contact: Malu `Aina P.O. Box AB Kurtistown,
Hawaii 96760. Phone 808-966-7622. email ja@interpac.net <http://www.malu-aina.org>

N26-1

The Stryker Brigades represent a new concept and a new organization that dictate how we will fight in the future. The officially approved Army doctrine lays out the training requirements and the amount of training lands needed to adequately prepare our soldiers to fight and win in the 21st century. We share and understand your concern on this issue. Our soldiers and their families live and work on our installations. As summarized in Section 4.12, the Army proposes mitigation measures to include UXO clearance activities prior to construction and during training activities to reduce the overall UXO accumulation and potential risk to human health and safety through the life of the project. This issue has the highest level of attention at the Department of Army and it is addressed by a centrally managed program that involves the identification, investigation, evaluation, and, if needed, remediation of potential sites. This program, called the Installation Restoration Program, is coordinated with the state and the US EPA to insure compliance with all laws and regulations. It is not, however, possible to estimate cost or time required related to a specific site until the evaluation phase has been completed. The Army is committed to cleaning up existing sites in accordance with applicable laws regulations. In addition, if the Army chooses to relinquish ownership of the land as a result of a Base Realignment and Closure (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.

Comments

Responses

CLEAN UP NOT BUIL

To U.S. Military and public officials:

We, the undersigned, oppose the further build up and desecration of military forces in Hawaii, including plans for "Army Transformation." means additional troops, equipment, aircraft, training, and military land on Hawaii Island. We believe it is time for the military to clean up, not build, include the 123,000-acre former Waikoloa Maneuver Area, the 108,000 Training Area, and Kawaihae Harbor area on Hawaii Island, the entire Makua Valley on Oahu, and other areas where the military has left unclean toxins. The U.S. military presently controls over 22% of Oahu and 5% of Hawaiian Islands.

Name (please print & sign)	address
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15. _____	_____

Please return to: Malu 'Aina P.O. Box AB Kurtistown, HI 96760. Phone 808-966-7621

Comments

Stop the Stryker Invasion!

- 1 SAY "NO" TO THE MILITARY'S 24,000-ACRE LAND GRAB!
- 2 SAY "NO" TO INOUE'S FEDERAL RECOGNITION BILL BECAUSE FEDERALIZING HAWAIIANS MEANS MILITARIZING THEIR LAND!
- 3 SUPPORT THE "STRYKER SEVEN DEFENSE—DEFEND YOUR RIGHTS!"

WHAT IS THE STRYKER? It's a *Civilian Assault Vehicle*: This "20-ton axles of evil" is being built for the quick transportation of infantry battalions on highways. It was not built for use in the deserts of Iraq where mortar shells and bombs have recently destroyed the strongest American tank. The Stryker is lightweight. It's built to be transported in airplanes three at a time, so that Bush and Company can quickly position American infantrymen throughout the world to put down civilians, fighting for their sovereignty and demonstrating against the U.S. EMPIRE BUILDERS.

HOW WILL THE MILITARY GRAB THE 24,000 ACRES OF HAWAIIAN LAND? Akaka Bill has morphed into Inouye's Federal Recognition Bill—inouye's attempt to Federalize the Hawaiian people: After 6 revisions of the Akaka Bill, the initial thrust of the bill which would have given some "autonomy" to Hawaiians, has been stripped down, and if passed will give the US Department of Interior, control over the Hawaiians as "wards of the state"—where the Hawaiians must surrender all claims to the ceded lands (which already make up 56% of the military lands in Hawaii). Governor Lingie supports the Inouye Federal Recognition Bill, and the state would no longer have to pay any Hawaiian reparations. They hope to get the morphed bill passed, by threatening to extinguish about \$59 million worth of current Hawaiian health, educational, homesteader programs that would lead to evictions of homesteaders. However, there's no assurance that the \$59 million federally funded programs for Hawaiians would be maintained after the bill's passage.

WHAT HAVE THEY DONE TO THE LAND! Look at Kahoolawe and Makua: Kahoolawe has been a symbol of the Hawaiians' quest for sovereignty, as George Helm and Kimo Mitchell lost their lives during the struggle for its return. Come November 11-12th, 2003, the military will be handing the desecrated island over to the State of Hawaii, having cleaned 1/10th of the ordinances, and leaving the island contaminated and uninhabitable. They call this "GOOD FAITH?" And, they have enlisted supposed leaders of the Hawaiian struggle to validate this farce—"Leaders" who have a vested interest in the \$59 million federal programs. Makua residents were evicted and given only a pittance during WWII—their homes, school, and church bombed, to make way for military training. In the Executive Order, the army had agreed to return the land to the territory six months after the war, but reneged. After Statehood, due to pressure from the community, 1/3 of Makua was returned to the state, but the state simultaneously, leased the land back to the military at \$1.00 for 65 years. The bombing continues leaving highly toxic materials and no plans by the US Military to clean up the mess. Bombed and burnt, exploded and unexploded ordinance litter the valleys. This is the future desecration of our Hawaiian people, land and sacred sites once Inouye **FEDERALIZES THE HAWAIIAN PEOPLE AND THEIR LAND.**

SUPPORT THE "STRYKER SEVEN!" *Defend your rights!* The military tried to exclude opponents of their plans and silence dissent by arresting seven opponents of the strikers who attempted to testify at the public hearings. By arresting people with phony charges of trespass for bringing signs to the "public" hearings, they hope to intimidate and silence the voice of the people. This is an example of the future loss of rights of not only Hawaiians, but the people of Hawaii, as the military's expansion here turns our lovely islands into a military base of the Pacific. Ask the people of South Korea, Okinawa and the Philippines about the rapes, "accidental killings", and colonizer mentality that will come along with lands used as a military base. For information, contact: DMZ-Hawai'i/Aloha Aina, c/o AFSC Hawai'i: www.afschawaii.org / 988-6266 This leaflet is sponsored by: Ohana Koa, Nuclear Free and Independent Pacific Malu Aina Center For Non-violent Education & Action: www.malu-aina.org, 966-7622

N26-2

Responses

N26-2

During the scoping meetings, the public facilities would not allow the meetings to extend beyond 10:00pm. This time restriction required that members of the public keep their oral comments short. After many public comments about the length of the meetings, and in an attempt to allow for full participation of all people present, the Army decided to hold the Draft EIS public meetings at private facilities where the facility was open as long as the Army needed. The majority of the Draft EIS public meetings did not conclude until after 12:00am.

At the first two meetings Honolulu Police Department arrested a total of seven people for trespass when they attempted to enter the facilities with signs. All individuals were advised that they were welcome to enter the facilities without the signs.

It was not the intent of the Army to restrict the public through the format and location of the public meetings. We corrected the situation by working with the other facility locations to allow signs in the meeting rooms and provide tables for members of the public to display signs and information. In addition, we worked with the facilities and the City and County of Honolulu's prosecutor and all charges were dropped against individuals involved in the situation. All of the individuals who were arrested had the opportunity to participate in subsequent meetings and most of them attended and provided public comment.

Comments

Responses

Letter
N27

-----Original Message-----

From: Molokai Advertiser-News (aka The MAN) George Peabody

[mailto:molokaiman@flex.com]

Sent: Thursday, November 13, 2003 11:36 AM

To: Barger, Cindy S POH

Subject: Stryker brigade HALT !!!

Importance: High

Dear Editors and military spoker Cindy Barger et al: Experience has shown that powers will be abused against the People. We all know that The Stryker brigade will be used against us as we fight for land, water and justice against the greedy and unConstitutional alien tyrants who control the fascist State of Hawaii bureaucracy acting against We The People in Hawaii . Ku'e !!! The People are the militia, and we militia will resist this TREASON and we will endure to the End! Read and understand the 2nd Amendment to the Constitution! Enforce the Bill of Rights. Sic Semper Tyrannis!

N27-1 | NO STRYKER BRIGADE !! A standing army is unConstitutional.

aloha,

George Peabody Militia of Molokai

<http://www.MolokaiAdvertiserNews.com>

<http://www.HawaiigovernorGeorgePeabody.com>

N27-1

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

MOKULEIA COMMUNITY ASSOCIATION
68-411 Farrington Highway
Waialua, HI 96791

Letter
N28

December 23, 2003

US Army Corps of Engineers, Honolulu District
(Attn: Ms. Cindy Barger)
Bldg 230, CEPOH-PP-E
Fort Shafter, HI 96858-5440

RE: COMMENTS ON THE DRAFT EIS FOR THE STRYKER BRIGADE

Dear Ms. Barger,

After reviewing the Draft EIS for the Stryker Brigade that will be stationed at Schofield Barracks, the Mokuleia Community Association has the following concerns regarding a couple of points.

- (1) Antennae are to be built to support the Brigade's training needs. There is not enough information on where these antennae would be located, the operational characteristics of these antenna, their overall visibility to the community, and how the Army will mitigate any impact on the view plane and potential operational impacts on humans, animals, and wildlife.

N28-1

In the North Shore Sustainable Communities Plan (approved by the City and County of Honolulu in July 2000 and the primary land use planning document for the North Shore district), the view plane of the Mokuleia area looking toward the Waianae mountain range is considered to be a valuable asset and is to be protected from unnecessary intrusions. These unspoiled views are part of what make the North Shore an attraction for visitors to Oahu and for other Oahu residents. We do not want to see this natural beauty marred by large, unattractive antennae. Tourism is now the primary economic driver on the North Shore.

N28-2

In addition to three private outdoor camps plus a City park for overnight camping, residential areas are also located within the Mokuleia community. Agricultural activities of the community also include animals such as cattle and horses. Operation of the antenna and their impact on humans, animals, and wildlife in our community is of concern.

Responses

N28-1

Details regarding antenna location, height, and other characteristics are found in Appendix D. As discussed in Sections 4.3, 5.3, 6.3, 7.3, and 8.3, the Army has committed to implementing mitigation for visual impacts by screening construction, mimicking surrounding areas, and other means. Biological impacts of the FTI towers are discussed in sections 4.10, 5.10, 6.10, 7.10, and 8.10.

N28-2

Biological impacts of the FTI towers are discussed in sections 4.10, 5.10, 6.10, 7.10, and 8.10.

Comments

Responses

RE: COMMENTS ON THE DRAFT EIS FOR THE STRYKER BRIGADE (continued)

N28-3

(2) The Army has also expressed their intention to use an old sugar cane road that formerly cut across the historic Dillingham Ranch property for transporting their trucks and vehicles. This former sugar cane road easement no longer exists.

The future viability of Dillingham Ranch is important to the Mokuleia and North Shore community. If the Army does intend to cut across the Dillingham Ranch as a means of transportation, it could seriously impact the viability of the Ranch to operate. This could cause serious socio-economic consequences for the North Shore area as the Ranch provides jobs for the community.

N28-4

How does the Army plan to mitigate their adverse impact on the Dillingham Ranch and its operation? How does the Army plan on using a road that no longer exists? What other alternatives are being considered to the condemnation of a right of way across Dillingham Ranch?

The potential socio-economic impact on our Mokuleia community of these antennae and of Army plans for Dillingham Ranch is not adequately addressed. Thank you for the consideration of our concerns. We look forward to your response.

Sincerely,


LLOYD O'SULLIVAN
Acting President
Mokuleia Community Association

N28-3

"The Dillingham military vehicle trail alignment shown in the EIS is the Army's preferred alignment. 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."

N28-4

Section 6.13 discusses socioeconomic impacts as a result of project activities at Dillingham Military Reservation. No socioeconomic impacts have been identified resulting from the construction of FTI antennas.

Comments

Letter
N29

*Mililani B. Trask, Convener
Na Koa Ikaika o Ka Lahui Hawaii
400 Hualani Street, Suite 194
Hilo, HI 96720*

Testimony Re: Stryker Brigade in Hawaii

Aloha:

I am Mililani Trask, a resident of Hilo and the Convener of an indigenous NGO named Na Koa Ikaika o Ka Lahui Hawaii that is located in Hilo, Hawaii.

Access to Report

N29-1

I am requesting that a copy of the report on the Stryker Brigade be sent to my office at the above address. I have had a limited opportunity to read the report. It has only been available at the Hilo Library – and has been in use 4 of 5 days I attempted to access it. DLNR Hilo has informed me that they have only 1 copy – on Oahu Island. I would like a copy to completely review the document and to provide a fuller response. I am also requesting that the comment period be extended to 90 days.

Concern Regarding Stryker

N29-2

As a resident of Hawaii Island and of the State of Hawaii, I am opposed to locating the Stryker Brigade in our state. The U.S. military has extensive holdings in Hawaii. In fact, data indicates that Hawaii is the most militarized State of the Union. Current military uses in Hawaii have created significant problems, which the U.S. military has been unable to address. These problems include toxicity, environmental degradation, threats to security of our community due to unexploded ordinance and the ongoing issue of compensation for land use.

N29-3

Hawaii island has 57 known sites that have or are being used for bombing, artillery and live fire exercises. Live ordinance has been found at Hilo, Hapuna and elsewhere. Last year, school children at Waimea found live grenades. At present, the U.S. has no strategic plan to address the threat posed by unexploded ordinance and it has no fiscal allocation to appropriate for this purpose. These questions should be addressed before further military expansion occurs.

N29-4

1. What is the current plan of the U.S. to address clean up of live ordinance on Hawaii island? How much money has been appropriated for this purpose?

N29-5

2. What is the current plan to identify and clean up live ordinance used by the Stryker Brigade on Hawaii island? How much funding has been appropriated for this purpose and where is the funding now?

Responses

N29-1

The public comment period was extended to 90-days and ended on January 3, 2004.

N29-2

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.

N29-3

We share and understand your concern on this issue. Our soldiers and their families live and work on our installations. As summarized in Section 4.12, the Army proposes mitigation measures to include UXO clearance activities prior to construction and during training activities to reduce the overall UXO accumulation and potential risk to human health and safety through the life of the project. This issue has the highest level of attention at the Department of Army and it is addressed by a centrally managed program that involves the identification, investigation, evaluation, and, if needed, remediation of potential sites. This program, called the Installation Restoration Program, is coordinated with the state and the US EPA to insure compliance with all laws and regulations. It is not, however, possible to estimate cost or time required related to a specific site until the evaluation phase has been completed. The Army is committed to cleaning up existing sites in accordance with applicable laws and regulations.

N29-4

We share and understand your concern on this issue. Our soldiers and their families live and work on our installations. As summarized in Section 4.12, the Army proposes mitigation measures to include UXO clearance activities prior to construction and during training activities to reduce the overall UXO accumulation and potential risk to human health and safety through the life of the project. This issue has the highest level of attention at the Department of Army and it is addressed by a centrally managed program that involves the identification, investigation, evaluation, and, if needed, remediation of potential sites. This program, called the Installation Restoration Program, is coordinated with the state and the US EPA to insure compliance with all laws and regulations. It is not, however, possible to estimate cost or time required related to a specific site until the evaluation phase has been completed. The Army is committed to cleaning up existing sites in accordance with applicable

Responses

laws regulations. In addition, if the Army chooses to relinquish ownership of the land as a result of a Base Realignment and Closure (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.

N29-5

If the Army chooses to relinquish ownership of the land as a result of a Base Realignment and Closure (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.

Comments

Comments

Responses

Letter
N30

923 Nu'uuanu Avenue • Honolulu, HI 96817 • Telephone: 808.537.4508 • Facsimile: 808.545.2019 • Website: nature.org/hawaii

December 28, 2003

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, HI 96858-5440

Dear Ms. Barger:

The Nature Conservancy (TNC) is an international non-profit organization dedicated to conserving the earth's biodiversity by protecting habitat for native plants and animals. We have more than 20 years of on-the-ground experience in Hawai'i. We appreciate the opportunity to provide formal comments on the Army's Draft Environmental Impact Statement (DEIS) for the Transformation of the 2nd Brigade, 25th Infantry Division (L) to a Stryker Brigade Combat Team in Hawai'i.

Our comments follow several face-to-face discussions we have had with Army personnel for more than a year. We are pleased that the Army has listened to our concerns related to the proposed acquisition of the northern portion of our Honouliuli Preserve for use as a small arms qualification range (QTR2). In this letter, we present formal comments on the DEIS, beginning with those related to the South Range Land Acquisition of Schofield Barracks, continuing to Pōhakuloa Training Area, and to general concerns related to proposed actions in other areas. Due to limited time, we are not able to provide page-by-page and word-for-word edits wherever needed, and trust that our comments will aid the Army in editing the DEIS where applicable.

SRAA - South Range Acquisition Area

The Nature Conservancy is the sole manager for Honouliuli Preserve on the island of O'ahu, which encompasses 3,700 acres along the eastern slopes of the southern Wai'anae Mountains (i.e. above Makakilo and Kunia). Our neighbor to the north is Schofield Barracks. In 1990, the landowner of the Honouliuli parcel (the Estate of James Campbell) granted TNC a long-term conservation lease to manage more than 90 rare species and some of Oahu's last remnants of diverse native forest. Since then, the Conservancy has spent more than \$3 million to conduct resource management and community outreach activities at Honouliuli.

Threats to Honouliuli Preserve include wildfire, animals such as feral pigs and rats, invasive weeds, and especially human disturbance. Consistent and intensive management in the form of fencing, weed control, planting native species, and seed collection is required to protect the area's many rare plants and animals and to restore native Hawaiian forests.

For the past four years, we have concentrated our work in the northern part of the preserve (Kalua 'ā/Waieli Priority Management Area) due to the higher chance of species' survival and ease of access. This Priority Management Area contains some of the most intact, diverse, and accessible native habitat in the Wai'anae Mountains. Kalua 'ā/Waieli also contains the largest reintroduced populations of several endangered plant species, now totaling more than 700 individuals. The entire preserve is also critical habitat for the O'ahu 'elepaio bird and numerous plant species.

This area is integral to the Army's Mākua Implementation Plan. Upon agreement with the U.S. Fish and Wildlife Service, the Army is required to stabilize existing populations and reintroduce new populations of 29 endangered species in order to continue training at Mākua. Five of these species occur in the

BOARD OF TRUSTEES: S. Haunani Apoliona • Peter Baldwin • Zedoc Brown, Jr. • Don Carroll • Carl Carlson, Jr. • Meredith Ching • Robert Clarke • Samuel Cooke
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Kalua`ā/Waieli area. The Mākua Implementation Plan designates four management units within Honouliuli Preserve, in which many activities are intended to take place for decades in order to stabilize populations of target species. The ability to work in these areas is directly connected to the successful implementation of the Plan, and the Army's ability to train in Mākua.

Land Use/Access (Section 5.2)

Impacts on natural resources management and recreational land use

Our activities in any given week could consist of rare plant restoration, high school classes participating in Project Stewardship (a conservation education program), fenceline inspection, control of rats eating endangered snails as well as young `elepaio, and interpretive hikes for the public. Our management and education work requires us to have access everyday of the week.

Contrary to the impression given throughout the DEIS (especially on p. 9-22), our main concerns are not focused on the 100 acres of current preserve land that would be acquired nor the impact on monthly interpretive hikes. Though they are important, we are primarily concerned about impact on access to the entire 400 acre Kalua`ā/Waieli Priority Management Area due to our need to manage the area as described above.

We are also concerned about possible crossing of boundary around the 100 acre area by TNC and Army personnel alike. On several occasions, we have witnessed Army personnel wandering through the preserve on their training maneuvers, apparently because they were unclear on the boundaries. Not only could these incidents disrupt planned activities, they could also result in harm to the plants and animals we are working to protect.

We are disappointed that the Draft EIS, on page 5-31, under "Regulatory and Administrative Mitigation" states that our access would only be allowed when the range is not in use. With the estimated 180 to 242 days per year and 8 to 12 hours of use per day, that could mean that we would be allowed only on weekends, holidays, and a few days in between. That clearly does not coincide with our work schedule, and as a result, these priority areas would be unmanaged and the impacts would be significant. An additional Mitigation that the Army "considers" in the Draft EIS is obtaining a permit to allow us access.

We propose that the following statements be rewritten to give us continual access that is necessary to carry out our work. Conservation is a long-term and continuous process, which requires a long-term commitment.

Mitigation:

The following language should be replaced in the DEIS, section 5.2.2; p. 5-31.

Significant Impacts Mitigable to Less than Significant

- Impact 1: Impacts on natural resources management and recreational land use. Training on and operation of the proposed QTR2 on the SRAA could affect land use within a portion of the Honouliuli Preserve. Approximately 100 acres (41 hectares) within the SRAA are part of the TNC-managed lands, which are available for intensive natural resource management and hiking. Immediately above the SRAA are lands intensively managed and used by TNC personnel, including volunteers. Access to this area would be blocked by the acquisition. Also, during training and operation of QTR2, as QTR2 was initially designed, natural resources management and recreational activities would be restricted within certain portions of the SRAA. This would have resulted in a significant impact on natural resources management and recreation within SRAA.
- Regulatory and Administrative Mitigation 1. In response to comments received early in the EIS process, USARHAW reoriented QTR2 such that the SDZ would no longer impact any lands within the Honouliuli Preserve. Additionally, if the Army implements the proposed action, it would grant TNC personnel and TNC-sponsored personnel (including volunteer hunters) daily, controlled access to the TNC-managed lands along a route to be determined by mutual agreement between TNC and the

N30-1

In response to comments received early in the EIS process, USARHAW reoriented QTR2 such that the SDZ would no longer impact any lands with the Honouliuli Preserve. Army will grant TNC personnel and TNC-sponsored personnel daily, controlled access to the TNC-managed lands along a route to be determined by the Army in consultation with TNC for as long as they have legal right to use of the affected property for conservation/stewardship purposes. Access controls will be developed and implemented to ensure the safety of all personnel and will consist of notification by TNC to the Army prior to entering Army lands and notification by the Army to TNC of any unusual activities that may present, or appear to present a danger to TNC personnel in the area. The boundary will be signed to prevent unauthorized use/trespass. Sections 5.11.2 and 8.11.2 discuss access for cultural practitioners.

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May 2004

N30-1
cont'd

Army later. Access will be granted via an easement to TNC and the landowner, for as long as they have legal right to use of the affected property for conservation/ stewardship purposes. Access controls will be developed and implemented to ensure the safety of all personnel and will consist of notification by TNC to the Army before entering Army lands and notification by the Army to TNC of any unusual activities that may present, or appear to present, a danger to TNC personnel in the area. This would include demarcation of boundary with signs, for example, around the 100 acre area, to alert soldiers and TNC personnel of official boundaries and prevent trespass. As reoriented, the QTR2 SDZ encompasses land that was previously used for agricultural purposes. Thus, the impact is considered significant but mitigable.

Biological Resources (Section 5.10)

Impacts from fire on sensitive species and habitat

Wildfire is one of the greatest threats to native Hawaiian forests. Largely due to live-fire training, the Army has had a history of fires that were ignited by training activities. The DEIS states that approximately 90, 110, 130 fires were identified in Schofield Barracks Military Reservation (SBMR) in 1998, 1999, and 2000, respectively (p. 9-50). We are very concerned about the spread of fires from Schofield, and especially from the proposed SRAA, into Honouliuli Preserve and the forests above SBMR. Given the number of TNC staff, students, and volunteers in the TNC managed area adjacent to the SRAA, the threat to human personnel is significant.

The recently completed "Integrated Wildland Fire Management Plan (IWFMP) - O'ahu and Pōhakuoloa Training Areas" (October 2003), is an integral component of the DEIS and should be included as an appendix. The DEIS alone does not adequately detail the measures outlined in the IWFMP that potentially mitigate the training impacts of a Stryker Brigade Combat Team with regard to wildfire management. Please see the attached document for specific comments on the IWFMP that we would like to see added to the IWFMP as soon as possible. In addition, we would like to make particular note of some specific items regarding the SRAA and the IWFMP.

Tracers and pyrotechnics

It is our understanding, both from reading the DEIS (p. 5-2) and speaking with Army officials in person, that the use of tracers and pyrotechnics would not be allowed in QTR2. The IWFMP, section 3.1 Pre-suppression Actions, Fire Danger Rating System, makes reference to the allowable use of pyrotechnics when the fire danger rating is green. Pyrotechnics would only be restricted when the fire danger rating is red. Enclosure 1 (page SRAA-13 of the IWFMP) also states that smoke grenades or simulators are authorized except in flammable areas. We view these statements as conflicting with the stated restriction of tracers and pyrotechnics in QTR2. The DEIS and IWFMP are vague and inconsistent as to exactly what types of live fire and pyrotechnics would be allowed in SRAA. We feel strongly that there should be no tracers or pyrotechnics allowed.

N30-2

Fuels Management

We are highly concerned about the spread of flammable grasses, such as guinea grass (*Panicum maximum*) and molasses grass (*Melinis minutifolia*) in the SRAA and neighboring areas. These grasses are ubiquitous in lower areas of the forest and along gulches in the pineapple fields, and could easily spread into the abandoned pineapple fields that would be encompassed in the SRAA. The IWFMP states that the areas immediately surrounding the QTR2 would be mowed regularly. The majority of the land area, however, would not. Fuel modification, or weed control, would consist of "crushing, chemical herbicide, and prescribed burning techniques (where applicable)." (IWFMP p. 7-96) We feel that weed control is of utmost importance, and that given the poor success rate of prescribed burns conducted by the Army in Hawai'i, prescribed burning should not be used at all in this area. The possibility of the fire escaping the firebreak road and running up into Kalua ā guich is very real, and would be extremely difficult to stop.

Smoking and open fires

Other sources of fire could be catalytic converters, campfires, and smoking. According to the IWFMP, smoking would be allowed in the QTR2 parking lot and on roads or other barren surfaces, and cooking

N30-2

The discussions in Sections 4.8, 4.9, 4.10, 8.8, 8.9, and 8.10 have been expanded in the Final EIS to better discuss the potential impacts of wildland fires. The impact to biological resources from wildland fires has been changed to significant. The mitigation measures proposed, including the updated IWFMP, will substantially reduce the severity of the impact on biological resources but not to less than significant levels.

Stryker Brigade Combat Team Final EIS, Hawai'i

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<p>N30-2 cont'd</p>	<p>fires would also be allowed when the fire danger rating is green. Due to the high fire danger, especially from the likely spread of flammable grasses, smoking and any type of open fire should not be allowed anywhere in QTR2.</p> <p>Annual Work Plan The IWFMP (p. SRAA 4) lists development of an annual work plan to identify fire management projects by priority. We urge the Army to include TNC and fire-prevention stakeholders such as the State Division of Forestry and Wildlife, and the Honolulu Fire Department, in this annual work plan development. An annual meeting would also greatly assist in review of fire prevention and suppression protocols of all parties and aid in collaboration.</p>
<p>N30-3</p>	<p>Education Fire-prevention briefing of Army personnel is included in the IWFMP. We urge the Army to include more information on the native forest resources and endangered species that would be threatened by fire, and include visual aids to supplement the verbiage stated on the briefing sheet (Enclosure 1, p. SRAA 13). TNC could assist the Army in providing more information for the briefing as well as brochures and signs. The Army's very capable Environmental Program could also assist.</p>
<p>N30-4</p>	<p>Funding and Human Resource Support As a preventive measure, the Army should provide funding and human resource support to help minimize potential impacts of fire in neighboring areas, including Honouliuli Preserve. Should a fire escape, the Army should provide adequate funding and human resources to replant any damaged area with native species appropriate for the area.</p>
<p>N30-5</p>	<p>Mitigation:</p> <ul style="list-style-type: none"> The IWFMP should be updated to reflect our concerns regarding tracers and pyrotechnics, smoking, use of open fire, use of prescribed burning technique, fire prevention-briefing, annual work plan development, and other concerns listed in this letter and the supplemental comment sheet. Potential mitigation measures listed under "Additional Mitigation 1" should be moved to "Regulatory and Administrative Mitigation 1." (DEIS p. 5-162) <p>Providing resources to help adjacent private landowners and organizations to manage their properties to minimize potential impacts of fire or other threats that may result from USARHAW activities or that may originate on private property and affect USARHAW activities.</p> <p>Replanting any area that is damaged by fires with plants, <i>preferably native species</i>, suitable for the habitat. Plants known to be invasive or noxious would not be used.</p> <ul style="list-style-type: none"> Adequate funding should be allocated for proper wildfire prevention education of all soldiers. This includes development of educational materials (e.g. Power Point presentations, brochures, signs). The Army should consult with conservation organizations and/or the Army's Environmental Program for their assistance in producing these materials.
<p>N30-6</p>	<p><i>Impacts on federally listed species</i></p> <p>Pu'u Hāpapa, located at the northern-most peak of the preserve along the current Honouliuli-Schofield boundary, is another important area of concern. It is considered a Biologically Significant Area 1 (BSA1) by the Army (DEIS p. 5-157). It is habitat for many native and protected plant species, and contains one of the largest and most diverse native land snail populations on O'ahu, including the endangered <i>Achatinella mustelina</i>, which is one of the target species in the Mākua Implementation Plan. Because rats prey on the snails and feral pigs devastate their habitat, the Army's Environmental Program and TNC have been working together to reduce rats through baiting and trapping. Additionally, TNC has focused its volunteer hunting program in the area to reduce the pig population.</p>

N30-3

All soldiers are briefed and given pocket information cards regarding safety issues and important resource areas at each training area prior to training. Please contact the Army at 655-3083 if you'd like to offer assistance.

N30-4

The Army will follow all measures outlined in the Integrated Wildland Fire Management Plan.

N30-5

Mitigation measures likely to occur are outlined in the Executive Summary. These proposed mitigation measures were included for public comment. The Army reviewed the measures based on public comments and the benefits of each measure to reduce impacts. The Army has listed those mitigation measures that are high priority and those that are unlikely to occur because of limited resource, unfeasible or there are similar measures already in place. The ROD will indicate which mitigation measures will be implemented.

N30-6

In response to comments received early in the EIS process, USARHAW reoriented QTR2 such that the SDZ would no longer impact any lands with the Honouliuli Preserve. Army will grant TNC personnel and TNC-sponsored personnel daily, controlled access to the TNC-managed lands along a route to be determined by the Army in consultation with TNC for as long as they have legal right to use of the affected property for conservation/stewardship purposes. Access controls will be developed and implemented to ensure the safety of all personnel and will consist of notification by TNC to the Army prior to entering Army lands and notification by the Army to TNC of any unusual activities that may present, or appear to present a danger to TNC personnel in the area. The boundary will be signed to prevent unauthorized use/trespass. Sections 5.11.2 and 8.11.2 discuss access for cultural practitioners.

Comments

N30-6 cont'd

This area is in the safety danger zone of the proposed firing range, QTR2, which would preclude effective hunting in the area, likely resulting in an increase in feral pigs, the rapid loss of the snail habitat, and the eventual loss of the snail population itself.

Mitigation:

- Working closely with TNC, the Army should assist in funding, constructing, and maintaining a fence at P'uu Hāpapa that would eliminate pig ingress to the native snail population. They should also assist in reducing rat populations.

Impacts on sensitive species resulting from the spread of nonnative species

We agree with the DEIS' assessment regarding the movement of troops and equipment into Hawai'i, introduction of alien species through the use of sand and gravel for construction and the resulting effect of the spread of invasive species. For example, ants and their associated insect pests can be devastating to rare native plant and animal populations. No ants are currently known from the middle to upper portions of the TNC managed areas. We agree that the impact of these actions would be lessened by instituting the Army's ongoing environmental programs and expanding them to newly acquired areas.

N30-7

Mitigation:

The following "additional mitigation" (DEIS p. 5-166) that the Army is "considering" should be made mandatory:

- educating soldiers and other potential users of the facilities and roads in the importance of cleaning vehicles and field gear.
- using native plants in any new landscaping or planting efforts where practicable.
- requiring all construction vehicles and equipment to undergo a mandatory wash prior to entering construction sites.
- inspecting and washing all military vehicles at wash rack facilities before they leave SBMR, KTA, or PTA to minimize spread of weeds and insects.

PTA – Pōhakuloa Training Area

The Nature Conservancy does not manage any preserves in the immediate vicinity of PTA. However, we do work cooperatively with State officials, other agencies and private landowners to identify and protect important native habitats in several watersheds on the Big Island. Of particular significance in relation to PTA are remnant dry-forest ecosystems that have been severely impacted historically by incompatible grazing, commercial logging, invasive grassland plants and fire.

N30-8

In recent years, the Army has made considerable progress in the identification, assessment and protection of rare plant habitat at PTA. However, we are concerned that the impacts associated with the proposed expansion of PTA by addition of the 23,000 acre Ke'āmuku parcel have not been fully evaluated nor have the most appropriate mitigation strategies been identified.

The Army acknowledges that there will be significant impacts to neighboring communities due to airborne dust, wind erosion and noise. We doubt, however, that these impacts can be adequately mitigated through operational protocol, troop training, strategic routing of access roads and/or reseeding of eroded lands.

N30-9

Our primary concern with expanded troop activity within PTA and, particularly, within the Ke'āmuku parcel, relates to wildfire. The recently prepared IWFMP helps to address our concern, but falls short in significant ways. Although live-fire training is not contemplated within the Ke'āmuku addition, proposed training exercises will include pyrotechnics. In addition, there appears to be no consideration of the risks associated with catalytic converter or other vehicle-related fires in grassland areas. The IWFMP does acknowledge increased fire risk due to diminished grazing in this parcel. That change in habitat condition,

Responses

N30-7

Mitigation measures likely to occur are outlined in the Executive Summary. These proposed mitigation measures were included for public comment. The Army reviewed the measures based on public comments and the benefits of each measure to reduce impacts. The Army has listed those mitigation measures that are high priority and those that are unlikely to occur because of limited resource, unfeasible or there are similar measures already in place. The ROD will indicate which mitigation measures will be implemented.

N30-8

The discussions and analysis in Sections 8.3, 8.5, 8.6, 8.9, 8.10 and 8.12 have been expanded to better evaluate the potential impacts from fugitive dust by the Proposed Action. With the expanded discussion and analysis, the Army has identified additional mitigation measures and in some cases the determinations of effect have changed

N30-9

The discussions in Sections 4.8, 4.9, 4.10, 8.8, 8.9, and 8.10 have been expanded in the Final EIS to better discuss the potential impacts of wildland fires. The impact to biological resources from wildland fires has been changed to significant. The mitigation measures proposed, including the updated IWFMP, will substantially reduce the severity of the impact on biological resources but not to less than significant levels.

Comments

Responses

**N30-9
cont'd**

taken together with substantial increase in proposed troop and vehicle activity within this area, will exacerbate the wildfire risk.

We support the proposal for expanded development of firebreaks and fuel breaks around the perimeter of the Ke'āmuku parcel and elsewhere at PTA. Special attention should be given to the adequacy of fire/fuel breaks around the areas that support significant populations of rare plants. In addition, we believe there are additional pre-suppression actions that should be implemented. The IVFMP indicates that a helicopter with trained personnel will be on station during live fire operations. We believe this SOP should extend, at least, to include all activities involving pyrotechnics and, potentially, for all off-road maneuvers in the Ke'āmuku parcel. We also believe that more permanent water sources and/or dip tanks be in place and operational during maneuver activity within this parcel.

General Comments

N30-10

TNC has general concerns about the consequences of expanding other training areas that echo those expressed for the SRAA and PTA. Key areas of concern are:

- Preventing wildfire, particularly in areas that will receive live-fire training including the use of tracers and pyrotechnics,
- Preventing the spread of non-native invasive species by troops and vehicles,
- Replanting damaged areas with native plants and using native plants in any new landscaping or planting efforts where practicable, and
- Providing resources to help adjacent private landowners and organizations to manage their properties and minimize impacts by the Army's training activities.

The DEIS should require rather than "consider" proposed mitigation measures to prevent and minimize the impacts of wildfire and alien species on native forests and endangered species. We recommend strongly that the Army plan and implement a very aggressive fire and weed prevention, response and rehabilitation program for all Transformation activities.

N30-11

Lastly, recent newspaper reports have announced that there has been a change to the Stryker Brigade in Hawai'i, approved by the Secretary of Defense. As we understand it, some of the changes relate to use of larger weaponry and different helicopters. Should the changes create impacts that are not reflected in the current DEIS, we ask that a supplemental DEIS be developed with an extended comment period.

In conclusion, we appreciate the Army's on-going consideration of our concerns, stated in this letter as well as in meetings. We recognize that the Army has tried very hard to work with concerned landowners, managers, and community members. We urge the Army to continue to communicate and work with us, as the Army is an important and valued conservation partner in Hawai'i. We will continue to seek ways to work together to accommodate the Army's training needs without damaging irreplaceable resources found only in these islands.

Sincerely,



Suzanne Case
Executive Director

enclosure

N30-10

Mitigation measures likely to occur are outlined in the Executive Summary. These proposed mitigation measures were included for public comment. The Army reviewed the measures based on public comments and the benefits of each measure to reduce impacts. The Army has listed those mitigation measures that are high priority and those that are unlikely to occur because of limited resource, unfeasible or there are similar measures already in place. The ROD will indicate which mitigation measures will be implemented.

N30-11

After the publication of the Draft EIS, the Army announced plans for an enhancement package for SBCTs. The enhancements include an aviation task force, an increase from twelve to eighteen 155mm howitzers in the direct support artillery battalion, and improvements to command, control, communications, computer, and intelligence (C4I) assets. The announcements indicated that the aviation task force would include Comanche helicopters when the aircraft were ready for fielding. In February 2004, the Army determined that no further testing or fielding of Comanches would occur and canceled the Comanche program. The SBCT aviation task force will come from existing 25th ID(L) aviation brigade assets and will result in minor changes to training, primarily some increased aviation training over WPAA in support of units training in that area. The FEIS has analyzed the impacts of the increased aviation training over WPAA and those impacts are minimal. The Draft EIS analyzed the impacts of twelve 155mm howitzers, a change from the eighteen 105mm howitzers currently in the direct support artillery battalion for 2nd brigade. The addition of another six 155mm howitzers was analyzed in the FEIS and resulted in minimal changes to noise impacts and no change in the overall determination of effect. The C4I improvements are not expected to have any impacts on the environment. Overall, the Army has determined that the enhancements are within the original scope of the proposed action as described in the Draft EIS, are minor in nature, and do not require a supplemental Draft EIS.

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December 31, 2003

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SBCT EIS Project Manager
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Re: DRAFT ENVIRONMENTAL IMPACT STATEMENT
Transformation of the 2nd Brigade, 25th Infantry Division (L)
to a Stryker Brigade Combat Team in Hawaii-- Ke'āmuku
Acquisition

Dear Ms. Barger:

These comments relative to the Draft Environmental Impact Statement (DEIS) for the Transformation of the 2nd Brigade, 25th Infantry Division (L) to a Stryker Combat Team in Hawaii are offered in behalf of the Paniolo Preservation Society (PPS), a not for profit 501c3 corporation established five years ago with the primary mission of preserving Hawaii's unique and historic ranching heritage.

In an April 16, 2002 memorandum delivered to the public scoping meeting held at the Outrigger Waikoloa Beach Hotel on April 17, 2002, the Paniolo Preservation Society availed to the IBCT transformation process its expertise in identifying, interpreting and preserving those features of the lands of Ke'āmuku that reflect significant historic, cultural and pastoral values relative to Hawai'i's ranching and paniolo heritage. The society has to date never been consulted, but did acquire a copy of the draft EIS and taken several meaningful exceptions to its findings. To place these objections in the appropriate context, kindly review our purposes and goals in attached document.

Specific areas of concern of the PPS for the conversion of the lands of Ke'āmuku into a West Pōhakuōa Training Area include the risk of degradation of historic sites, cultural features, educational value, community vision, grassland resources, and environmental integrity, as well as aesthetic, spiritual and inspirational values. Despite the offer by the PPS to provide such background and counsel, the draft EIS clearly overlooked the opportunity leaving the society with little alternative but to oppose the transformation process.

N31-1

N31-1

Based on public comment, the Army has conducted more detailed analysis and expanded the discussion in many of the resources sections in the Final EIS. In some cases, the Army has changed the determination of effect to reflect this analysis and discussion. The impacts to the resources and the Army's determination of effect are summarized in Chapter 4 - Environmental Consequences.

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Historic Sites

In chronological order, concerns are registered with regard to the risk of further destruction to the original campsites of early native Hawaiian shepherds, Nahuku to the northwest and Akuna to the southeast.

The camp, stonewall enclosures, corrals, loading chutes, house foundations, dipping vats and water cisterns date back to the eras of MacFarlane, Johnson, Spencer and Parker operators of the mid-1800s.

Fixtures representative of the early to mid-1900s have clearly defined remnant features including bar and post corrals, loading chutes, alleyways and parting gates. Many of these features are evident throughout the entire length and depth of the Ke'āmuku Lands from Kalawa Mauna in the northwest to Pu'u Ke'eke'e in the southeast.

While Parker Ranch in recent years added portable panels to erect temporary corral facilities, all other fixtures throughout the body of the lands of Ke'āmuku clearly fall within the spirit of preservation and stewardship standards mandated by the Paniolo Preservation Society and quite likely by the rules of the State Historic Preservation Division and the purview of the National Historic Preservation Act.

Cultural Features

The lands of Ke'āmuku are deeply embedded with culture of the early Hawaiian people who conducted livestock farming (pigs, dogs and chickens) in the Waimea area as early as 750 A.D. Evidence of crop farming (yams) precedes that date. In the ensuing eleven centuries before the arrival of cattle, sheep, goats and horses, the hog rapidly propagated in the hills and plains of Ke'āmuku. The hog is the animal icon of native Hawaiian beliefs that in the life of a single person, the sacrificial and celebratory consumption of pork marks the six stages of life starting with birth and ending with death.

As the wild cattle spread across the plains of Waimea from Kalawa Mauna to the west, Kawaihae-uka to the north and Mānā to the east, with them came English, Mexican, Scottish and Irish cattlemen who early on recognized the Native Hawaiian skills in working of cattle and horses, hence was borne the image of the Hawaiian cowboy, the paniolo who has amassed a cultural image of his very own.

Ke'āmuku is featured repeatedly in the writings of pioneer sheep and cattle ranchers as the birthplace of the industry largely due to its bountiful forage resources, the foundation of ranching throughout the world, bringing into history the American hero, the cowboy. Hawai'i's paniolo are likewise cultural heroes as evidenced by the heroic bronze monument of Ikua Purdy in Waimea—celebrating all of the cowboys of the Kingdom, Territory and State of Hawai'i.

Educational Values

As one of its primary purposes, public awareness of the community of Hawaii and greater America, regarding our ranching heritage is a "front burner" issue of the PPS. In addition to contributing to various media avenues regarding the documentary portrayal of

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N31-2

We have directed the contractors working on this site to contact the Paniolo Preservation Society for assistance in evaluating these sites.

N31-2

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N31-2
cont'd

Hawaii's ranching heritage, PPS members and agents have conducted innumerable classroom, panel, seminar and conference presentations regarding the historic background of the cattle industry, its leaders and its field personnel. Ke'āmuku is a vital component of this history given its multi-specie, multi-ethnic, and multi-purpose features spanning more than a dozen centuries from the early Hawaiian farmer to the present day Parker paniolo.

Community Vision

The general community of Waimea does in fact reflect the values of the people of North Hawai'i. Without a doubt, the villages of North and South Kohala, the Pu'uānāhulu village of North Kona and the multiple hamlets of Hāmākua including Ahualoa, Hōnoka'a, Waipi'o, Kukuihaele, Pā'auhau, Pa'auilo and 'O'ōkala are alive with people that are part of the paniolo history of the Island of Hawai'i.

N31-3

The 23,000-acre lands of Ke'āmuku represent a more than significant component of ranching and paniolo heritage. Conversion of these lands to military use would impose a serious impact on the desire of the community to retain its ranching image and paniolo lifestyle.

After World War II community leadership resisted military attempts to convert the Lālāmilo training area to a permanent facility. Without such resistance, Waimea would become what Wahiawā became, relative to Schofield Barracks, simply an "Army town" with little indication of Hawaiianess. Fifty years later, the communities of North Hawai'i rise to the challenge with profound support of the PPS in opposing military imposition on the rural and paniolo character of 'āina Waimea. The community vision calls for greater emphasis on its ranching heritage, not dilution.

Grassland Resources

From the days of MacFarlane's Pu'uloa Sheep and Cattle Company through the eras of Parker, Carter and modern management, the Ke'āmuku grasslands properly managed carried about 3,500 mother cows on an annual basis. Furthermore the historic success of the 4-H youth programs routinely called for Ke'āmuku steer calves for show purposes, often resulting in blue ribbon state champions.

N31-4

The most profound testimony to the strength of the Ke'āmuku grasslands came in a 1986-87 study conducted by Drs. W.C. Bergin (myself) and Ben Norman of the Veterinary Extension Department of the University of California-Davis. It involved measuring performance of calf crops from nine different Parker Ranch sections over a two-year period. Over 20,000 calves were ear-tagged and tracked from birth through weaning, feedlot entry and slaughter at finishing. Of the nine sections, the Ke'āmuku steer and heifer calves were heaviest at weaning, heaviest at feedlot entry and heaviest carcass at slaughter. Such objective data clearly demonstrate that under proper management, the grasslands of Ke'āmuku represent a highly productive agricultural resource that should remain unencumbered for ranching use.

N31-3

We have directed the contractors working on this site to contact the Paniolo Preservation Society for assistance in evaluating these sites.

N31-4

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.

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Environmental Integrity

N31-5 Brittle is the term used to describe the Ke'āmuku environment. Until recently, prudent pastoral management called for periodic rest and recovery periods. At times, the whole division was depopulated of livestock for significant time periods representing appropriate stewardship of ground cover (forage) and deterring soil erosion. Military use, as described in the draft EIS fails to adequately address the impact of the transformation process. A striking example of poor military stewardship is the deeply rutted and heavily eroded "tank trails,"—one traversing Waiki'i Ranch (original) and the second one paralleling in a western course a mile away in Parker Ranch proper.

N31-6 It is the position of the PPS relative to the draft EIS that the state Office of Environmental Quality Control which is charged with administering portions of HRS 343 will require that assessments of proposed action on cultural practices to include all ethnicities. If the Ke'āmuku lands are to be re-classified away from its present pastoral (agricultural) use, the PPS would expect an inquiry into the affect of such transformation on the ranching or paniolo lifestyle and local cowboy culture. The draft EIS has provided no significant indication that such an inquiry ever took place.

N31-7 The draft EIS proposes that an Integrated Training Area Management program (ITAM) would be used to mitigate potential impacts on the land via a cooperative relationship with Parker Ranch to continue grazing the lands of Ke'āmuku. The PPS takes the position that the proposed rate of exercises (40-60/year) would unduly tax the brittle environment to a point of severely stripping forage and topsoil, leaving significantly damaged surface area for grazing. To graze cattle over and above such soil forage degradation raises an issue of prudent stewardship of land and livestock, in fact, raises concerns for animal welfare. Animal and plant life are doubly taxed under such a proposal with gross disregard for the integrity of the soil and grasslands of Ke'āmuku.

Aesthetic, Spiritual and Inspirational Values

The sweeping plains, rolling hills, scented eucalyptus and scattered multi-colored livestock represent the serenity that marks the district of Waimea as unique and special.

Of significant spiritual impact however, is the fact that among the green grass and low-lying olive trees are the scattered remains of two great men of Parker Ranch, Andrew Fong and Walter Stevens who in their twilight years chose to have their ashes interred in their beloved 'āina Ke'āmuku.

Andrew Fong, a noted paniolo worked for Parker Ranch under Walter Stevens for over 35 years. Walter was his dearest friend, boss and confidant. Walter, in turn, was the consummate Hawaiian cowboy—stoic, handsome and capable. In the 155 years of Parker Ranch's existence, the name Wala (Walter) continues to be remembered with reverence, as he was undoubtedly the finest horseman the Ranch ever produced.

N31-8 The Paniolo Preservation Society recommends that the EIS process, reflect on the aesthetic, inspirational and spiritual aura that is sensed in the sheer beauty of pastoral Ke'āmuku. For these values and the above registered concerns, the PPS takes significant

N31-5

The EIS identifies erosion as a potential significant impact of the project in this area. The discussion can be found in Section 8.9.

N31-6

Army Transformation is a federal project, not a state project, and is therefore not required to comply with state law regarding cultural impact studies. Conversion of the WPAA to military use is described as a less than significant impact in Section 8.2.2. However, 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.

N31-7

The purpose of the ITAM program is to assess impacts of training activities and restore areas damaged or make changes to training and operations to minimize future damage. By making changes to training schedules, activities, and restoration activities on an ongoing basis the impacts can be minimized.

N31-8

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.

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N31-8
cont'd

issue with the proposed transformation of the 2nd Brigade, 25th Infantry Division (L) to a Stryker Brigade Combat Team using the lands of Ke'amuku as a West Pohakuloa Training Area.

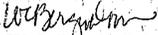
N31-9

In closing, the PPS has two requests. First, that the society be formally acknowledged as a consulting party and, secondly, that the ensuing structure of the EIS be fashioned in a manner that would allow interested parties to review, digest, identify and respond to potential impacts of transformation proposals. A more concise, less bulky and ambiguous document may produce more meaningful responses from concerned citizenry as well as interested bodies such as the PPS.

N31-10

With a deep sense of appreciation for this opportunity to address the concerns found in the draft EIS, I remain:

Sincerely,



W.C. Bergin, D.V.M.
President
Paniolo Preservation Society

Attachment

c: Pat FitzGerald
Sonny Ke'akealani
Co-chairpersons, Trails and Artifacts Committee

N31-9

In response to the comment, the Army has initiated consultations with the Paniolo Preservation Society as an interested party in the NHPA Section 106 process. If the Army decides to implement the Proposed Action, the Army will continue to work with the Society as the project progresses.

N31-10

The FEIS is divided into 5 geographical areas making it easier for the general public to focus on impacts the project might have on their community. In addition there is a guide inside the front cover describing the organization of the document, an abstract of the FEIS, and a very detailed Table of Contents. In addition the Executive Summary highlights the important aspects of the proposed project including a project description, a summary of impacts, and proposed mitigation.

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THE KAMUELA CHARITIES
OF THE PARKER RANCH FOUNDATION TRUST
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December 31, 2003

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Ft. Shafter, Hawaii 96858-5440

Re: DRAFT ENVIRONMENTAL IMPACT STATEMENT
Transformation of the 2nd Brigade, 25th Infantry Division (L)
to a Stryker Brigade Combat Team in Hawaii

Dear Ms. Barger:

Attached is comment letter submitted on behalf of Hawaii Preparatory Academy, Parker School Trust, and North Hawaii Community Hospital. These entities are beneficiaries of the Parker Ranch Foundation Trust and are referred to collectively in the Trust document as the "Kamuela Charities."

While these comments are being submitted jointly, they constitute separate comments relative to the DEIS on behalf of separate nonprofit entities. In other words, there is no formal association or committee of the beneficiaries at this time. The Kamuela Charities do have common interests relative to the quality of the physical and cultural environments in the Kamuela area as supported organizations under the Parker Ranch Foundation Trust.

The Kamuela Charities thank you for the opportunity to submit these comments and look forward to working cooperatively with the Army Corps of Engineers and other interested parties to ensure that an appropriate environmental review is completed before any irretrievable commitment of resources occurs. Please include Hawaii Preparatory Academy, Parker School Trust, and North Hawaii Community Hospital as consulted parties in the EIS process and

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Cindy S. Barger
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Page 2

provide copies of communications relative to the proposed project to the chairpersons of each of the Kamuela Charities as listed below and to my office.

Thank you for your attention to this matter.

Very truly yours,



Roy A. Vitousek III

Hawaii Preparatory Academy
c/o Mc Blasdell, Chairperson
65-1692 Kohala Mountain Road
Kamuela, Hawaii 96743

Pat Bergin, Chairperson
North Hawaii Community Hospital
67-1125 Mamalahoa Highway
Kamuela, Hawaii 96743

Alan Gartenhaus, Chairperson
Parker School Trust
P. O. Box 2080
Kamuela, Hawaii 96743

Comments

THE KAMUELA CHARITIES
 OF THE PARKER RANCH FOUNDATION TRUST
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December 31, 2003

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Re: DRAFT ENVIRONMENTAL IMPACT STATEMENT
 Transformation of the 2nd Brigade, 25th Infantry Division (L)
 to a Stryker Brigade Combat Team in Hawaii

Dear Ms. Barger:

These comments relative to the Draft Environmental Impact Statement ("DEIS") for the Transformation of the 2nd Brigade, 25th Infantry Division (L) to a Stryker Brigade Combat Team in Hawaii are offered on behalf of Hawaii Preparatory Academy, North Hawaii Community Hospital, and Parker School Trust as individual nonprofit entities and as beneficiaries of the Parker Ranch Foundation Trust ("PRFT"). PRFT is the current fee owner of the parcel identified in the DEIS as THE West Pohakuloa Acquisition Area ("WPAA").

Hawaii Preparatory Academy ("HPA") is a nonprofit organization which operates a kindergarten through grade 12 boarding and day school in Kamuela, Hawaii, which has provided quality education to a wide range of Hawaii, United States, and international students for more than 50 years. HPA's uniqueness as an educational institution and its curriculum are dependent upon the quality of the Kamuela community and the surrounding environment. HPA's setting in a healthy, diverse cultural and physical environment enhances the school's ability to attract quality students, faculty, and employees as well as educational opportunities for students. HPA is one of the largest employers in the Kamuela area and offers a range of financial aid and scholarship options to local students.

The Parker School Trust ("Parker School") is a nonprofit entity which operates a 6th through 12th grade day school in the heart of Kamuela town. Like HPA, Parker School is dependent on the quality of the Kamuela and North Hawaii communities to attract students,

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faculty, employees, and to offer a wide range of course offerings. One of Parker School's founders was Richard Smart, former owner of the Parker Ranch and settlor of PRFT. Parker School, together with other beneficiaries, has been deeply involved in working with PRFT to effectuate Mr. Smart's vision for PRFT, its beneficiaries, and the Kamuela community.

The North Hawaii Community Hospital ("NHCH") is a nonprofit organization which operates a full-service community hospital in Kamuela, Hawaii. NHCH is dedicated to the mission of improving the health status of the people of North Hawaii, not only by providing quality medical and hospital care, but also in enhancing other aspects of the community which contribute to the overall health and wellbeing of the people of North Hawaii. NHCH, like the other beneficiaries, depends on the quality of the cultural and physical environment of North Hawaii to attract employees, physicians, patients, and donors to the hospital.

HPA, Parker School, and NHCH are identified in the PRFT as the "Kamuela Charities." The Hawaii Community Foundation, a Honolulu-based nonprofit organization, is the other PRFT beneficiary. The Kamuela Charities believe that they were selected as beneficiaries of the PRFT because they have an interest in the long-term quality of the physical and cultural environment in the Kamuela area. The Kamuela Charities have worked cooperatively and in concert to exercise their rights and responsibilities as the organizations supported by PRFT pursuant to Internal Revenue Code § 509A(3). This effort has included a thorough review of PRFT's financial and organizational status including review of the current state of strategic planning and land use planning conducted by the trustees of PRFT.

As nonprofit entities in the Kamuela area and as beneficiaries of the PRFT, the Kamuela Charities are interested parties in proposed sales and use of large tracts of land in the North Hawaii area, particularly where those tracts are owned in fee simple by PRFT. The Kamuela Charities have interest in the proposed federal acquisition and use of the subject property which are special and personal to the Kamuela Charities, and not in common with interest with the general public.

N32-1

Specifically, with respect to the DEIS, the Kamuela Charities are concerned that the DEIS fails to adequately identify and assess the full range of potential adverse environmental and cultural impacts that may be caused by the proposed project:

N32-2

1. Biological Resources. The DEIS fails to adequately assess the potential effects of the proposed project on the physical environment. The DEIS does not attempt to assess the proposed environmental effects of the project from the perspective of restoration potential of the subject property. In other words, while the 23,000-acre parcel has been significantly impacted by grazing activity, a strong potential for environmental restoration exists--particularly in the up-slope areas adjacent to Saddle Road and Waiki'i Ranch. Specifically, while the property has lost forest coverage due to grazing, many areas have not yet been impacted by fire and there exists a real potential for reforestation and restoration of critical habitat for a number of native species including endangered bird species.

N32-1

Based on public comment, the Army has conducted more detailed analysis and expanded the discussion in many of the resource sections in the Final EIS. In some cases, the Army has changed the determination of effect to reflect this analysis and discussion. The impacts to the resources and the Army's determination of effect are summarized in Chapter 4 - Environmental Consequences.

N32-2

Revisions have been made to section 8.10 regarding impacts to biological resources. After a careful reevaluation the Army has determined that the impacts from fire would cause a significant impact to sensitive species. The mitigation measures described will reduce the impact considerably it will not reduce it to less than significant. While the property may have the potential to allow native forests and grasslands, there are no current or future plans for that to occur. The Final EIS has looked at all reasonably foreseeable projects in evaluating the impacts.

Comments

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Page 3

N32-2
cont'd

The biological work performed as part of the DEIS fails to adequately address the potential contribution of this area to restoration of endangered species habitats if grazing activities were modified to accommodate reforestation.

The Kamuela Charities believe there is a potential to continue viable economically rewarding agricultural use of the property under conditions that allow for reestablishment of native forests and grassland environments. Instead, the DEIS assesses the potential adverse environmental effects of the project as if only alternative potential use is extensive grazing. This does not present an adequate or appropriate picture of the potential adverse effects of the project.

N32-3

2. Fire. Clearly and unquestionably, a military maneuvering area causes an increased risk of wild fire. In areas previously forested with native plants, risk of fire can be catastrophic as fire destroys seed banks in the soil and prevents wide-scale reforestation. These risks are in addition to the risks of fire escaping into existing forest areas, pockets of native vegetation currently located within the subject area, and residential structures, and the like. The DEIS does not adequately assess the risk of fire to seed banks in the soil and the adverse effects that fire may have on potential reforestation.

N32-4

3. Cultural Impacts. The DEIS fails to conduct an adequate assessment of the cultural impacts of the proposed project. The area of the proposed project has a rich cultural history of both pre-contact native Hawaiian use and historic use of the property which have been conducted for more than 50 years. The DEIS does not contain a thorough, systematic cultural impact assessment. The attempt to assess cultural impacts of the project by simply looking at specific features on the property does not adequately identify potential adverse effects. Instead, an appropriate cultural impact assessment should include assessment of the traditions, families, and activities involved in and connected to the property and should look at how denial of access to the property or conversion of the use of the property from traditional activities to military maneuvering will result in adverse cultural impacts throughout the community. The Kamuela Charities understand that Kepa Maly of Kumu Pono Associates has studied the cultural history of the area on behalf of the Waiki'i Homeowners Association and has done cultural impact assessments relative to Mauna Kea as part of the Mauna Kea Master Plan. Consequently, a great deal of cultural information potentially relevant to the subject area is available and should have been considered in conjunction with the DEIS.

N32-5

4. Community Impacts. The subject property is currently part of a working cattle ranch which is part and parcel of the rural, agricultural "Paniolo" lifestyle of the Kamuela community. Diverting lands used from an active cattle ranch to military maneuvering will have adverse cultural impacts on the rural traditions important to ranching communities such as Kamuela and Puuanahulu. The Kamuela Charities are concerned that the potentially adverse cultural and environmental impacts cannot be mitigated and have a widespread negative effect on the quality of life in the North Hawaii area.

N32-6

5. Effects on Other Surrounding Properties. The Kamuela Charities are concerned that there has been an inadequate assessment of other potential environmental consequences of

Responses

N32-3

The text has been changed in Sections 4.10 and 8.10 to incorporate this request. Large scale reforestation is an unlikely management option in the immediate future. Presently research in Hawai'i Volcanoes National Park is being done on revegetating recently burned pockets of nonnative forest with fire tolerant native plants to increase the ability of these communities to combat encroachment by alien plants. The initial research shows that some native plants are indeed fire tolerant and can successfully resprout or germinate in a post-fire environment

N32-4

Sections 4.11, 8.11, Chapter 9, and Chapter 10 have been expanded to incorporate information from the Maly studies. The Army has determined that project impacts and cumulative impacts to areas of traditional importance are significant.

N32-5

Conversion of the WPAA to military use is described as a less than significant impact in Section 8.2.2. However, 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. However, as discussed in Chapter 9, the Army acknowledges that the cumulative impact on the conversion of agricultural lands from past, present and reasonable foreseeable future actions would be significant.

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**N32-6
cont'd**

the proposed acquisition and use of the West Pohakuloa Training Area. Specifically, there are substantial concerns relative to soil loss, erosion, contamination, and slope failure associated with the increased additional use of the area by heavy vehicles. This area is already prone to wind and water erosion and the increased number of roads, increased use of vehicles off road, and other factors with the training will significantly increase the risks of soil loss and erosion. In addition, the results of the assessment of soil contaminants in the Pohakuloa Training Area suggests that the same concerns will exist in the West Pohakuloa Training Area if the acquisition is complete. While these issues have been mentioned in the DEIS, the DEIS does not include assessment of the long-term impacts of soil contamination, loss, and erosion—not only on the subject property itself, but on adjoining properties that may be impacted by these conditions.

N32-7

6. Impacts on the Kamuela Charities, Limitation of Planning Options. The Kamuela Charities submit that the DEIS did not consider potential cultural and community-wide impacts of acquisition of the Pohakuloa Training Area viewed from the perspective of the Kamuela community and particularly the Kamuela Charities. The 23,000 acres currently owned by Parker Ranch are part of the corpus of the Trust that is supposed to provide long-term benefit to the Beneficiaries and, through preserving the lifestyle and quality of the Kamuela community, to the general North Hawaii community. The Kamuela Charities are concerned that a one-time sale of 23,000 acres of land with potential future economic value has a significant adverse environmental and cultural effects on the community which has simply not been evaluated in the DEIS.

N32-8

7. Loss of Agricultural Lands. The current use of the property is primarily for grazing. There have been other historical and agricultural efforts undertaken on the property or on nearby property. The land is currently suited for agricultural use and the Kamuela Charities are concerned that moving up to 23,000 acres from productive agricultural use may have an adverse impact on the availability of appropriately zoned agricultural property and may have an adverse general impact on agriculture in the North Hawaii area. As parcels of land are taken out of agricultural uses and put to other uses, there are significant and immediate changes in the character and quality of the Kamuela community; there is an irretrievable commitment of resources to nonagricultural uses which will have significant effects throughout the community. To the extent that loss of prime agriculture lands reduces the commitment to agriculture in a region, the future use of the balance of PRFT lands or other lands currently in grazing activity becomes questionable. It is important that a thorough and thoughtful analysis of the region-wide impacts of removing prime agriculture lands from agriculture use be conducted as part of the DEIS.

N32-9

8. Archaeological and Cultural Resources. The Kamuela Charities are concerned that the DEIS does not adequately address protection of existing cultural and archaeological resources on the property. The Kamuela Charities question the significance assessments and mitigation plans. Increased access to the area by vehicles and ground troops will clearly impact archaeological and cultural site and this is not adequately addressed in the DEIS.

N32-10

9. Cumulative Impacts. The Kamuela Charities are concerned that the DEIS does not contain an adequate assessment of potential cumulative impacts of the proposed project.

N32-6

Among the potential impacts on adjacent lands would be deposition of soil and sediment that is eroded from the WPAA parcel. The effects would be monitored within the framework of the ITAM program, and erosion impacts would be addressed on an ongoing basis. While the erosion impacts discussed in the EIS are considered likely to occur, they will not occur instantaneously, but will develop over time. Mitigation measures will be implemented to reduce the impacts, and the effectiveness of the mitigation measures will be evaluated. The location and nature of the long term impacts is unpredictable, and may be mitigable in specific areas. The Army will perform additional detailed baseline studies of the existing vegetation and soil conditions, and will refine the model of the potential impacts of the project on these conditions. While the available data and modeling suggest that significant impacts will occur within the WPAA, no modeling has been performed to forecast the extent of the effects, if any, on adjacent lands. Mitigation measures are discussed in Section 8.9.

N32-7

Conversion of the WPAA to military use is described as a less than significant impact in Section 8.2.2. However, 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.

N32-8

During the EIS review process, the Army has coordinated with Natural Resource Conservation Service and is compiling with all requirements of the Farmland Policy and Protection Act (FPPA). (See Sections 4.2, 8.2, and Appendix E.) If the Army decided to implement the proposed action, the

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N32-10 cont'd | These impacts include transportation, population increases, impacts on schools, health care, traffic, etc.

N32-11 | 10. Structure of DEIS. The Kamuela Charities are concerned about the structure and presentation of the DEIS. It is extremely difficult for potentially impacted parties to review the entire DEIS and excerpt out portions of the DEIS that may apply to their areas of specific concerns. The potential impacts of different aspects of the project are buried in a mass of information which essentially prevents the average citizen from being able to review the DEIS and identify potential impacts relative to their area of involvement. This structure deters community members, native Hawaiians, and others who may have limited resources from being able to adequately address the potential impacts of the project. The DEIS should be divided into separate areas which are treated separately or a key should be provided that allows one seeking to review the DEIS to identify pages and exhibits which are relevant to the different components of the project.

11. Request to be Consulting Parties. The Kamuela Charities—i.e., Hawaii Preparatory Academy, Parker School Trust, and North Hawaii Community Hospital—ask to be consulted parties as this project goes forward. Please communicate with the separate entities as follows:

N32-12

Hawaii Preparatory Academy
c/o Mc Blasdel, Chairperson
65-1692 Kohala Mountain Road
Kamuela, Hawaii 96743

and

Hawaii Preparatory Academy
c/o Roy A. Vitousek, Director
75-170 Hualalai Rd., Ste. B-303
Kailua-Kona, Hawaii 96740

Pat Bergin, Chairperson
North Hawaii Community Hospital
67-1125 Mamalahoa Highway
Kamuela, Hawaii 96743

Alan Gartenhaus, Chairperson
Parker School Trust
P. O. Box 2080
Kamuela, Hawaii 96743

Responses

management and use of the West PTA acquisition area would be conducted per federal regulations and guidelines. State regulations and guidelines do not apply to federal actions. However, the Army has considered State policies in its overall assessment of impacts in the EIS. In following FPPA requirements, CEQ guidance and Army policy, the Army has determined that the proposed conversion of West PTA acquisition area is consistent with these regulations and guidance and the impact would be less than significant.

N32-9

Based on public comment, the Army has expanded the cultural resource discussions throughout the document and including Section 8.11 and Chapter 9 - cumulative impacts. Based on the expanded discussion, the Army has changed the determination of effect to cultural resources in some cases to significant. The Army, SHPO, and ACHP have completed the PA that addresses these issues. The Final PA as signed by the Army, SHPO, ACHP and concurring parties is included in Appendix J of the Final EIS.

N32-10

Chapter 9 - cumulative impacts, has been expanded in the Final EIS and some of the determinations of effect have been changed to significant.

N32-11

The comment period has been extended to a total of 90-days and ended on January 3, 2004 to allow additional time for review. The FEIS is divided into 5 geographical areas making it easier for the general public to focus on impacts the project might have on their community. In addition there is a guide inside the front cover describing the organization of the document, an abstract of the FEIS, and a very detailed Table of Contents. In addition the Executive Summary highlights the important aspects of the proposed project including a project description, a summary of impacts, and proposed mitigation.

N32-12

Thank you for your comment. There is not a "consulting party" status for the NEPA process. However, the Army has added the names and addresses to the distribution list. All will be notified of the availability of the Final EIS and the availability of the final Record of Decision.

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Thank you for the opportunity to comment.

Respectfully submitted,



Roy A. Vitousek III
for

KAMUELA CHARITIES OF THE
PARKER RANCH FOUNDATION TRUST

cc: Mc Blasdel
Pat Bergin
Alan Gartenhaus

Responses

Comments

Responses

May 2004

Stryker Brigade Combat Team Final EIS, Hawaii

P-284

Letter N33

-----Original Message-----

From: PLEMER001@hawaii.rr.com [mailto:PLEMER001@hawaii.rr.com]
Sent: Sunday, November 09, 2003 1:03 PM
To: mary.holkenbrink@tetrattech.com
Subject: Comment entry for the 25th Infantry Division (Light)
Transformation EIS

Marisa
Plemer
Protect Our Native Ohana
59-008 Huelo Street
Haleiwa
HI
96712

Add me to the mailing list? Yes

Please send me the Draft EIS. No

Please send me an Executive Summary of the Draft EIS. No

Please send me a CD-ROM of the Draft EIS. No

The user wrote:

When the Army has studied, incorporated and addressed the crucial information contained in the following documents, and also made these two publications published by federal government departments available to all of Hawaii's citizens, then the Army might be able to come up with a meaningful, legitimate Final EIS that does not insult our intelligence, our health, our islands, our water, our air, our children, and future generations of Hawaii's citizens:

N33-1

1. FEDERAL HAZARDOUS WASTE SITES IN THE STATE OF HAWAII: COMPLIANCE, CLEANUP AND WASTE MANAGEMENT, HEARING BEFORE THE COMMITTEE ON GOVERNMENTAL AFFAIRS UNITED STATES SENATE ONE HUNDRED FIRST CONGRESS SECOND SESSION AUGUST 29, 1990 (U.S. GOVERNMENT PRINTING OFFICE, WASHINGTON, 1992, ISBN 0-16-039033-8);
2. RECOVERY PLAN FOR KOOLAU MOUNTAIN PLANT CLUSTER, AUGUST, 1996 (PUBLISHED BY U.S. FISH AND WILDLIFE SERVICE, PORTLAND, OREGON);
3. RECOVERY PLAN FOR WAIANAE MOUNTAIN PLANT CLUSTER, AUGUST, 1996 (PUBLISHED BY U.S. FISH AND WILDLIFE SERVICE, PORTLAND, OREGON);
4. RECOVERY PLAN FOR THE BIG ISLAND PLANT CLUSTER, SEPTEMBER, 1996 (PUBLISHED BY U.S. FISH AND WILDLIFE SERVICE, PORTLAND, OREGON).

N33-1

Thank you for your comments. For Document No 1: This project only covers those installations that will have Transformation activity or projects on them. For those hazardous waste sites identified in the project area they are addressed by a centrally managed program that involves the identification, investigation, evaluation, and, if needed, remediation of potential sites. This program, called the Installation Restoration Program, is coordinated with the state and the US EPA to insure compliance with all laws and regulations. It is not, however, possible to estimate cost or time required related to a specific site until the evaluation phase has been completed. The Army is committed to cleaning existing sites in accordance with applicable laws and regulations. For Documents 2,3, and 4: Information in these reports were included in the Biological Assessment. The data from the BA was incorporated into the EIS.

Comments



SIERRA CLUB

HAWAII CHAPTER

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Responses

3 January 2004

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

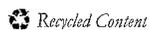
RE: Draft Environmental Impact Statement: Transformation of the 2nd Brigade, 25th Infantry Division (L) to a Stryker Brigade Combat Team in Hawai'i

The Sierra Club, Hawai'i Chapter submits the following comments regarding the Draft Environmental Impact Statement for the Transformation of the 2nd Brigade, 25th Infantry Division (L) to a Stryker Brigade Combat Team (SBCT) in Hawai'i. Unfortunately, due to process concerns, errors, omissions, and inconsistencies, the Sierra Club believes that the DEIS should be redrafted and put out for public comment once again.

In some ways, the military has made positive contributions to Hawaii's environment through their Ecosystem Management Programs. They have been proactive in protecting endangered species and maintaining watersheds on many military-controlled lands on O'ahu and the Big Island. Their fencing programs, invasive species eradication, and endangered species propagation programs have made notable, albeit small, improvements in biological resources on lands that may otherwise go unmanaged due to lack of resources. The Sierra Club compliments the military on these programs and encourages their maintenance and expansion.

Unfortunately, such improvements have been eclipsed by incredible damage and resource degradation due to uncontrolled fires from training, pollution from hazardous materials, unexploded ordnance in the environment, and other environmental and health impacts from the military's presence in Hawai'i. Last year, over 2000 acres burned in Makua Valley on O'ahu by a "controlled" fire that became uncontrolled. Approximately 150 acres of Oahu Elepaio Critical Habitat and approximately six acres of O'ahu Plant Critical Habitat were burned. The O'ahu Plant Critical Habitat that burned was designated for *Schiedea hookeri*, *Bonania mensezji*, *Neraudia angulata* var. *dentata*, *Nototrichium humile*, *Euphorbia haeleleana*, and *Gouania vitifolia*. Individuals of three endangered taxa were burned including *Chamaesyce celastroides* var. *kaenana*, *Nototrichium humile* and *Lipochaeta tenuifolia*. Thirty-seven individuals of *C. celastroides* var. *kaenana* from two locations, 29 individuals of *L. tenuifolia*, and 5 individuals of *N. humile* were burned in this fire. Other species were also damaged or destroyed.

The fire confirms two problems. First, military training in Hawai'i brings significant environmental impacts. When the unavoidable results of live-fire training occur in areas with some of the highest concentrations of endangered species in the world, irreparable damage will occur. Second, no



Jeff Mikulina, Director

Comments

Sierra Club Comments on Stryker Brigade expansion DEIS Page 2

matter how much mitigation is proposed and carried out, accidents happen. The fire at Makua was a "controlled" burn that turned into a wildfire. Although promises to protect species and resources are made, the military simply cannot guarantee that accidents with significant, long-term damage will not occur.

In Hawai'i, the military has contaminated groundwater sources, left land riddled with unexploded ordnance, blocked access to cultural sites, and failed to adequately clean up areas that were previously used for training. Promises made to return land in a cleaned-up condition have been broken. After nearly \$400 million was spent in cleaning up the island of Kahoolawe, only about 10% of the island will be completely clear of unexploded ordnance. Some of this reflects the military's commitment to protecting the environment; some is simply the physical reality of military training in Hawai'i.

It is from this background that we review the SBCT DEIS.

The Sierra Club, Hawai'i Chapter's main concerns can be summarized as follows:

- N34-1 • **New information.** In December 2003 it was announced that the Stryker Brigade would include training with Comanche helicopters and 155 mm howitzers. Impact information from this equipment was not contained in the DEIS.
- N34-2 • **Stryker expansion as a foregone conclusion.** The Pentagon announced on December 17th, 2003, that Hawai'i would have a Stryker Brigade. This decision calls into question the legitimacy of the environmental review process, where such a decision is made based on full disclosure of impacts and alternatives.
- N34-3 • **Military's failure to clean up old sites.** From Kahoolawe to areas on the Big Island, the military has a history of inadequately cleaning up former training sites. The Sierra Club believes that former military sites should be cleaned completely before new areas are adopted for training.
- N34-4 • **Habitat protection.** In Makua Valley and elsewhere, fire and invasive species have degraded habitat and destroyed endangered species. Training is currently occurring in areas without adequate wildfire management plans and the DEIS does not include wildfire management plans for each area where training is proposed.
- N34-5 • **Cultural site protection.** Desecration of cultural and sacred sites has been an ongoing concern for the native Hawaiian community and others. The DEIS does not contain an adequate Cultural Impact Statement, complete with interviews of cultural practitioners. Surveys to identify and evaluate archaeological sites at proposed training areas have not been fully completed, and Cultural Resource Management Plans and programmatic agreements for historical sites have yet to be completed.
- N34-6 • **Public access.** Public access on military-controlled lands for recreation, resource protection, hunting, and cultural practices is limited. The DEIS does not adequately disclose how much access will be curtailed for resource protection (ie. for the Nature

Responses

N34-1

After the publication of the Draft EIS, the Army announced plans for an enhancement package for SBCTs. The enhancements include an aviation task force, an increase from twelve to eighteen 155mm howitzers in the direct support artillery battalion, and improvements to command, control, communications, computer, and intelligence (C4I) assets. The announcements indicated that the aviation task force would include Comanche helicopters when the aircraft were ready for fielding. In February 2004, the Army determined that no further testing or fielding of Comanches would occur and canceled the Comanche program. The SBCT aviation task force will come from existing 25th ID(L) aviation brigade assets and will result in minor changes to training, primarily some increased aviation training over WPAA in support of units training in that area. The FEIS has analyzed the impacts of the increased aviation training over WPAA and those impacts are minimal. The Draft EIS analyzed the impacts of twelve 155mm howitzers, a change from the eighteen 105mm howitzers currently in the direct support artillery battalion for 2nd brigade. The addition of another six 155mm howitzers was analyzed in the FEIS and resulted in minimal changes to noise impacts and no change in the overall determination of effect. The C4I improvements are not expected to have any impacts on the environment.

Overall, the Army has determined that the enhancements are within the original scope of the proposed action as described in the Draft EIS, are minor in nature, and do not require a supplemental Draft EIS.

N34-2

Although the Department of Defense, Department of the Army, and Congressional representatives have issued statements that the 2nd Brigade, 25th ID(L) will transform to a Stryker Brigade, these statements refer to programmatic level decisions necessary to continue the planning, funding and assessment processes for the proposed transformation efforts and set the conditions for implementing an action once a final decision has been made. The final decision on whether the 2nd Brigade, 25th ID(L) will transform to an SBCT will be made by the appropriate local commander, subject to environmental assessment and other appropriate reviews and compliance with applicable federal law.

Comments

Sierra Club Comments on Stryker Brigade expansion DEIS Page 3

N34-6
cont'd

Conservancy at their Honouliuli Preserve on O'ahu) and cultural practice, especially at PTA on the Big Island.

On the following pages, our comments and questions (in italics) follow the bulleted section of the DEIS or the issue that we are commenting on. We look forward to your responses to our concerns and request that we receive physical copies of all future correspondence and EIS process documents.

Thank you for the opportunity to submit our concerns.

Sincerely,

Jeff Mikulina
Director, Sierra Club, Hawai'i Chapter

Responses

N34-3

We share and understand your concern on this issue. Our soldiers and their families live and work on our installations. As summarized in Section 4.12, the Army proposes mitigation measures to include UXO clearance activities prior to construction and during training activities to reduce the overall UXO accumulation and potential risk to human health and safety through the life of the project. This issue has the highest level of attention at the Department of Army and it is addressed by a centrally managed program that involves the identification, investigation, evaluation, and, if needed, remediation of potential sites. This program, called the Installation Restoration Program, is coordinated with the state and the US EPA to insure compliance with all laws and regulations. It is not, however, possible to estimate cost or time required related to a specific site until the evaluation phase has been completed. The Army is committed to cleaning up existing sites in accordance with applicable laws regulations. In addition, if the Army chooses to relinquish ownership of the land as a result of a Base Realignment and Closure (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.

N34-4

The Integrated Wildland Fire Management Plan for O'ahu and Pōhakuoa Training Areas was updated on October 2003 and incorporated lessons learned from the Makua fire. As discussed in the Final EIS Executive Summary proposed mitigation, the Army will fully implement this plan for all existing and new training areas to reduce the impacts associated with wildland fires. The plan is available upon request.

N34-5

Cultural resource sections have been updated in the Final EIS. The overall impact to cultural resources on a project wide basis is significant. The Programmatic Agreement and other measures will reduce the severity of the impact but not always to a less than significant level.

Comments

Sierra Club Comments on Stryker Brigade expansion DEIS Page 4

*SIERRA CLUB, HAWAI'I CHAPTER
STRYKER BRIGADE EXPANSION COMMENTS*

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N34-6

In response to comments received early in the EIS process, USARHAW reoriented QTR2 such that the SDZ would no longer impact any lands with the Honouliuli Preserve. Army will grant TNC personnel and TNC-sponsored personnel daily, controlled access to the TNC-managed lands along a route to be determined by the Army in consultation with TNC for as long as they have legal right to use of the affected property for conservation/stewardship purposes. Access controls will be developed and implemented to ensure the safety of all personnel and will consist of notification by TNC to the Army prior to entering Army lands and notification by the Army to TNC of any unusual activities that may present, or appear to present a danger to TNC personnel in the area. The boundary will be signed to prevent unauthorized use/trespass. Sections 5.11.2 and 8.11.2 discuss access for cultural practitioners.

Comments

Sierra Club Comments on Stryker Brigade expansion DEIS Page 5

ENVIRONMENTAL IMPACT STATEMENT PROCESS CONCERNS

New Information

- In December, 2003, it was announced that the Stryker Brigade expansion would use Army Comanche helicopters, which will replace the OH-58 Kiowa Warriors. The brigade would also add 155 mm howitzers, which are normally assigned to larger units, in addition to the smaller 105 mm howitzers.

This information was not included in the Draft EIS. Different helicopter use and larger howitzers will cause new impacts that need to be fully disclosed in the EIS and be made available for public comment. The Sierra Club believes the changes are significant enough to warrant a new EIS with new public comment period.

"Done deal"

- CFR Appendix E, (a) "EISs will: ... (4) Serve as a means to assess environmental impacts of proposed military actions, rather than justifying decisions."
- According to the *Honolulu Star-Bulletin*, on December 17th, 2003, the Pentagon officially announced that Stryker combat teams will be stationed in Hawaii and Pennsylvania. The paper wrote: "The Schofield brigade is expected to be operational by 2006, according to the Pentagon."

Was a decision on the Stryker Brigade Transformation location in Hawai'i made before the draft EIS came out in October 2003?

If the decision was not made a priori, were the following statements by elected leaders and others false?

Senator Daniel Inouye said "he has been assured that Hawaii will get a Stryker brigade" ("Sen. Inouye Says He Was Assured a Stryker Brigade," Associated Press, Hawaii Tribune-Herald, June 20, 2003)

The Army is planning to relocate its Big Island Fire and Emergency Service from Kilauea Military Camp to Pohakuloa Training Area by August 2004... "This decision... is directly related to the increased workload associated with PTA's Transformation Plan and the significant number of additional facilities planned" and the many wildland acres which require more firefighting capability (June 24, 2003 letter from Colonel Anderson to Rep. Ed Case)

"Despite an adverse government report, the U.S. Senate, urged by Hawaii's Daniel Inouye, has set aside \$17.5 million for the new Stryker brigade slated for Schofield Barracks over the next decade. The money... is contained in the \$369.2 billion Defense Appropriations bill for next year, approved by the Senate Appropriations Committee yesterday. Inouye said the money is an addition to the \$71.8 million moved by the same... Committee last month to fund four projects at Schofield Barracks to support the Stryker brigade." (Isle Strykers Gain More Funds, Honolulu Star-Bulletin, July 10, 2003)

Construction and research money for transformation have already been put into the military budget. About \$89 million has already been set aside for Schofield alone. ("Stryker Meeting to Draw Picketers" Gregg Kakesako, Honolulu Star-Bulletin, July 14, 2003)

"Although there's been no official word from the Pentagon on where the new quick-strike [Stryker] units would be based, 'We're moving as if this is already an accomplished fact,' said

Responses

N34-7

After the publication of the Draft EIS, the Army announced plans for an enhancement package for SBCTs. The enhancements include an aviation task force, an increase from twelve to eighteen 155mm howitzers in the direct support artillery battalion, and improvements to command, control, communications, computer, and intelligence (C4I) assets. The announcements indicated that the aviation task force would include Comanche helicopters when the aircraft were ready for fielding. In February 2004, the Army determined that no further testing or fielding of Comanches would occur and canceled the Comanche program. The SBCT aviation task force will come from existing 25th ID(L) aviation brigade assets and will result in minor changes to training, primarily some increased aviation training over WPAA in support of units training in that area. The FEIS has analyzed the impacts of the increased aviation training over WPAA and those impacts are minimal. The Draft EIS analyzed the impacts of twelve 155mm howitzers, a change from the eighteen 105mm howitzers currently in the direct support artillery battalion for 2nd brigade. The addition of another six 155mm howitzers was analyzed in the FEIS and resulted in minimal changes to noise impacts and no change in the overall determination of effect. The C4I improvements are not expected to have any impacts on the environment. Overall, the Army has determined that the enhancements are within the original scope of the proposed action as described in the Draft EIS, are minor in nature, and do not require a supplemental Draft EIS.

N34-8

Although Department of Defense, Department of the Army, and Congressional representatives have issued statements that the 2d Brigade, 25th ID(L) will transform to a Stryker Brigade, these statements refer to programmatic level decisions necessary to continue the planning, funding and assessment processes for the proposed transformation efforts and set the conditions for implementing an action once a final decision has been made. The final decision on whether the 2d Brigade, 25th ID (L) will transform to an SBCT will be made by the appropriate local commander, subject to environmental assessment and other appropriate reviews and compliance with applicable federal law.

Comments

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Abercrombie, D-Hawaii. 'I don't think the secretary of defense if going to turn us down at this stage...I am assured personally that Hawaii will get a Stryker brigade,' Inouye said in June." (Hawaii Prepares for Brigade, Hawaii Tribune-Herald, August 13, 2003)

N34-8
cont'd

"Both houses of Congress also have passed a...\$9.7 billion military construction bill...\$75 million of which is for Hickam Air Force Base's new C-17 jet transport squadron being established to set up the...Stryker combat brigade...More than \$80 million...would go to acquire more land in Wahiawa to begin...work for the...Stryker..." (Akaka Plans \$400 billion defense bill...Honolulu Star-Bulletin, November 13, 2003)

"Earlier this year, a defense spending bill approved by the House and Senate included \$433 million for Hawaii projects, including funds earmarked for a new Stryker brigade." (Hawaii Nets Stryker, Hawaii Tribune-Herald, December 16, 2003)

Participation

- **Executive Summary p 3** "Those having a potential interest in the Proposed Action...were notified and invited to participate in the scoping and environmental impact analysis process."

This is not accurate:

Arrests *The Army had people arrested at two hearings in Honolulu for bringing signs. Signs were allowed at hearings before the arrests, and later after the arrests. The arrests deprived people of their right to speak, and probably had a chilling effect on participation in the remaining hearings.*

Intimidation and harassment *The Hilo police left a phone message asking a Hilo activist if he planned to be arrested at the hearings. Waikoloa Beach Marriott left him a message that people carrying protest signs must enter through the loading dock. The Marriott passed out a flyer saying "public displays of protest" were not allowed in the hotel.*

N34-9

Private facility venues *for EIS hearings, where citizens can be ejected at the word of the property owner, were used instead of public venues.*

Closed-door meetings *The Army kept the public out of meetings about the expansion.*

**On May 16, 2002 the Army invited selected business and government people to a meeting and dinner in Hilo. Concerned citizens picketed outside, then entered the meeting and said such meetings must be open to the public.*

**The Army again invited a selected group to a another closed meeting where the Army expansion and other land use issues were discussed, on July 16, 2003, in Hilo. This time police barred protesters from entering, and the Army ejected a Sierra Club representative who entered the meeting.*

Cancelled tour *In September 2002 the Army abruptly cancelled a tour of Pohakuloa requested by about 15 community people concerned about the Army transformation plans. The Army said some of the people were unacceptable, but refused to say who.*

Disability accommodation *The Army failed to provide adequate accommodation at the November 6 hearing for a Hilo person with a disability.*

Comment time *The comment time was extended, but is still inadequate for groups to explore the ramifications of the proposed action and prepare a meaningful response. There are only 90 days to comment on an EIS that fills three 2-inch books, and proposes the largest Army construction project in Hawaii since World War II.*

N34-10

Decision-maker *A neutral third-party, or an agency other than the Army, should make the decision on the EIS. The Army should not make the decision on its own EIS.*

Responses

N34-9

During the scoping meetings, the public facilities would not allow the meetings to extend beyond 10:00pm. This time restriction required that members of the public keep their oral comments short. After many public comments about the length of the meetings, and in an attempt to allow for full participation of all people present, the Army decided to hold the Draft EIS public meetings at private facilities where the facility was open as long as the Army needed. The majority of the Draft EIS public meetings did not conclude until after 12:00am.

At the first two meetings Honolulu Police Department arrested a total of seven people for trespass when they attempted to enter the facilities with signs. All individuals were advised that they were welcome to enter the facilities without the signs.

It was not the intent of the Army to restrict the public through the format and location of the public meetings. We corrected the situation by working with the other facility locations to allow signs in the meeting rooms and provide tables for members of the public to display signs and information. In addition, we worked with the facilities and the City and County of Honolulu's prosecutor and all charges were dropped against individuals involved in the situation. All of the individuals who were arrested had the opportunity to participate in subsequent meetings and most of them attended and provided public comment.

N34-10

Under NEPA, the agency proposing the action makes the decision on the action after the EIS has been completed. The Army will make the final decision on the action with the issuance of the Record of Decision.

Comments

Responses

"NEED" FOR STRYKER BRIGADE IN HAWAII

N34-11

- Executive Summary p 3 The Army wants Transformation to meet its goal "to be able to deploy anywhere in the world and be prepared to carry out the Army's military mission within 96 hours of deployment from Hawaii."

Please explain how the goal of "able to deploy...within 96 hours" can be met in light of the US GAO comments: "...the U.S. General Accounting Office reiterated last month an Air Force-sponsored report that the Army cannot achieve its goal of deploying a Stryker brigade anywhere in the world within four days." ("Isle Strykers gain more funds," Honolulu Star-Bulletin, July 10, 2003)

N34-12

- Executive Summary p 23 "If the 2nd Brigade is to train at either of these installations [Alaska, Fort Lewis, Fort Polk]...all the people, equipment, and vehicles...would have to be transported...[so] soldiers could train with their own equipment..."

If identical or similar equipment is available at the other four locations, why can't the soldiers train there without transporting their own equipment? Wouldn't this save a substantial amount of money?

N34-13

- Chapter 2 p 35-38 "Doctrine provides that the area of operations for which the SBCT could be responsible in combat is normally 31 miles by 31 miles...training lands must be sufficient and widely spread to approximate operating in an area that size by simulating the density of units and activities that might occur during combat...advanced communication makes it possible for the SBCT to train on noncontiguous parcels of land, even separate islands, and still simulate operating in a 31-mile by 31-mile area...[Land Use Requirements Study U.S. Army 1997c is cited]...the RTLP Range Development Plan (RDP) describes the land required for individual maneuvers necessary to meet the training requirements for combat within a 31-mile by 31-mile area...The largest of these maneuvers...requires 122,564 acres...land acquisitions would add up to...approximately 78% of the goal, which, when combined with training available along the proposed military use trails, will meet mounted maneuver training needs."

The EIS needs to give more details from the 1997c Army Land Use Requirements study and the Range Development Plan by Nagata Group LLC 2002, plus details on how trails will be used for maneuvers, to support the conclusion that the Army needs 23,000 more acres. The EIS should specify if the 23,000 acres is needed for maneuver training needs or mounted maneuver training needs.

N34-14

Fewer than 4500 out of 12,500 soldiers will be left at Schofield Barracks by early summer 2004--4500 soldiers in the Second Brigade go to Iraq in February 2004, and 3500 soldiers with the Third Brigade go to Afghanistan in April 2004. Both will stay for a year. But note that in 1965, some soldiers who went to Vietnam stayed five years. The draft EIS must evaluate the need for 23,000 more training acres with this decrease in numbers. ("Deployment for 25th likened to Vietnam," Honolulu Star-Bulletin, November 9, 2003)

N34-15

While the Army is proposing the largest Army construction project in Hawaii since WW II, the military is planning to close out about one-fourth of its base capacity on the continental US, including one-third of Army posts and one-quarter of Air Force bases. Closures also occurred

N34-11

As a result of the GAO report and ongoing Army operations, the Stryker vehicles are being modified to fit in C-130 aircraft. Additionally, deployment practices continue to evolve. The Transformation process allows for adaptations to equipment and operations to ultimately meet the goals of current, SBCT, and future forces.

N34-12

The equipment located at the installations noted will be used to capacity by the units stationed there. There would be not enough downtime for that equipment to allow for training an additional brigade.

N34-13

For more information on the Range Development Plan please contact US Army Hawai'i, Range Control Office. Section 2.3, under the paragraph heading Mounted Maneuver Training, discusses the need for the additional 23,000 acre WPAA parcel as necessary for mounted maneuver training.

N34-14

These deployments, while lengthy in some cases, are temporary and are part of Army activities at all bases. The Army is engaged in a wide range of missions around the world requiring all types of forces. There is no information to suggest that Stryker forces would be deployed more often or for longer durations than current forces.

N34-15

As discussed in section 1.6 of the FEIS, the ROD for the Programmatic EIS directed the 2nd Brigade, 25th Infantry Division (Light) at Schofield Barracks, Hawai'i to transform to an SBCT. The Commanding General of the 25th ID (L) is charged with deciding how best to achieve that directive and provide for military training, readiness, and facility requirements to meet SBCT transformation needs, while enabling the current forces to continue carrying out their missions and giving due consideration to environmental factors. This decision will be based on the results of this EIS, and on consideration of all relevant factors including mission, cost, technical factors, and environmental considerations. This EIS considers a reasonable range of alternatives including several alternatives that involve transforming and/or training on the U.S. mainland. As discussed in Section 2.6, the mainland alternatives were not

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**N34-15
cont'd**

in 1988, 1991, 1993, and 1995. ("Quarter of US Military Bases May Be On the Chopping Block," Stars and Stripes European edition, October 15, 2003)

Why can't the Stryker Brigade be located at one of the existing bases that is slated for closure instead of expanding onto new land in Hawai'i?

MILITARY FAILURE TO CLEAN FORMER SITES

- **Executive Summary p 60** "Impacts of introduction of contaminants to ranges from increased ammunition use" would be mitigated by "taking appropriate remediation prior to transferring property out of DoD control."

Increased ammunition should not be allowed because adequate remediation has not occurred with past sites. Kaho'olawe was returned to the State without adequate clean up. Over 50 former military sites on Hawaii Island still await cleanup 60 years after WW II. The Army Corps of Engineers says it will take "centuries" at present funding levels to clean them up.

N34-16

We understand that nearly \$400 million was expended by the end of 2003 in cleaning up the island of Kahoolawe of unexploded ordnance. Reports are that only about 10% of the island will be clear of UXO. The existing Pohakuloa Training Area of 108,000 acres is approximately 3 times the size of Kahoolawe. The 123,000-acre Waikoloa Maneuver Area is about 4 times Kahoolawe. Add to that the former Pakini Iki bombing range near south point, the Mt. View range, the Makuu bombing range, the several south Kohala off shore bombing ranges to clean up. What is the estimated cost of cleaning up PTA of UXO? What is the estimated quantity and kinds of UXO at PTA?

N34-17

- **Chapter 4 p 77-78** "Recent range studies at...PTA have revealed elevated levels of munitions byproducts, such as lead and RDX, [cyclotrimethylenetrinitramine] above USEPA Region IX residential and industrial PRGs [preliminary remediation goal]...This material...is an environmental hazard...the quantity of ammunition rounds fired during Army training on all Army training ranges in Hawai'i would increase from 16 million to 20 million rounds per year, primarily consisting of small arms munitions. The proposed increased level of training could elevate contamination levels in range soils by 25 percent...Existing and potential impacts from ammunition are considered significant and not mitigable until live-fire range training ceases and a remediation plan is considered...in the event any active range is closed and transferred out of DoD control...remediation necessary to mitigate an imminent threat to human health and the environment would be undertaken at such time."

The draft EIS needs to include a closure cleanup plan so Pohakuloa is returned to the state in usable condition. This did not occur with Kaho'olawe.

N34-18

- **Chapter 8 p 28** People may be evacuated and roads may be closed to clean up unexploded ordnance so the tank trail can be built.

Evacuation and road closures will impact residents severely. Cleaning up unexploded ordnance on the 50-plus former military sites hazardous to the people who live here must be done before cleaning up for new military land. Unexploded ordnance has been turning up all over the island for 60 years...Hilo Bay, Hapuna Beach, a Waimea school, South Point, Maku'u Farm Lots area, and other sites.

Responses

analyzed in detail because they did not meet the purpose and need of the proposed action. (Complete details on the proposed action are presented in Chapter 2 and Appendix D.)

N34-16

We share and understand your concern on this issue. Our soldiers and their families live and work on our installations. As summarized in Section 4.12, the Army proposes mitigation measures to include UXO clearance activities prior to construction and during training activities to reduce the overall UXO accumulation and potential risk to human health and safety through the life of the project This issue has the highest level of attention at the Department of Army and it is addressed by a centrally managed program that involves the identification, investigation, evaluation, and, if needed, remediation of potential sites. This program, called the Installation Restoration Program, is coordinated with the state and the US EPA to insure compliance with all laws and regulations. It is not, however, possible to estimate cost or time required related to a specific site until the evaluation phase has been completed. The Army is committed to cleaning up existing sites in accordance with applicable laws regulations. In addition, if the Army chooses to relinquish ownership of the land as a result of a Base Realignment and Closure (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.

N34-17

We share and understand your concern on this issue. Our soldiers and their families live and work on our installations. As summarized in Section 4.12, the Army proposes mitigation measures to include UXO clearance activities prior to construction and during training activities to reduce the overall UXO accumulation and potential risk to human health and safety through the life of the project This issue has the highest level of attention at the Department of Army and it is addressed by a centrally managed program that involves the identification, investigation, evaluation, and, if needed, remediation of potential sites. This program, called the Installation Restoration Program, is coordinated with the state and the US EPA to insure compliance with all laws and regulations. It is not, however, possible to estimate cost or time required related to a specific site until the evaluation phase has been completed. The Army is committed to cleaning up existing sites in accordance with applicable laws regulations. In addition, if the Army chooses to relinquish ownership of

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- N34-19
- Chapter 8 p192 "...ammunition presents a significant risk of soil contamination in the range areas. Remedial cleanup would take place when the training areas are permanently closed."

This risk is unacceptable. Ammunition use must be changed to eliminate the risk. The EIS must specify how soon after closure cleanup will be completed, since the Army is saying it will take "centuries" to clean up the more than 50 former military sites on Hawaii Island.

The EIS must define "cleanup," since Kaho'olawe is being returned to the state "cleaned up" but with hazards still present.

- N34-20
- Chapter 8 p194 tank trail "construction would be preceded by Army-sponsored surface and subsurface clearance and if necessary followed by ordnance health and safety monitoring during construction in order to reduce potential exposure and impacts from this project...Prior to initiation of any construction activities...USARHAW (US Army Hawaii) would employ qualified professionals to perform a UXO [unexploded ordnance] sweep of the proposed construction area, remove all UXO encountered to ensure the safety of the site, and document UXO surveys and removal actions..."

The Army should be clearing ordnance on the more than fifty former military sites that threaten residents on Hawaii Island, before clearing ordnance for a new military site.

HAZARDOUS MATERIALS

- N34-21
- Chapter 2, p 16-17: "Per state regulation, military convoys are not authorized to operate on state highways during 'rush hour'...Movements on Saturday, Sunday, and holidays are by special request only. Convoys travelling from Kawaihae Harbor to PTA must get clearance, and vehicles operating on Saddle Road within the boundaries of PTA must not exceed 25 mph. Units must seek permission from the 25th Infantry Division for convoys of 25 vehicles or more. Permission must also be granted from the State of Hawai'i DOT for convoys of six or more vehicles or to move oversized or outsized cargo over state highways. As long as all federal, state, and Department of Defense...regulations are followed **no additional permits are required to move munitions.**" [bold added]

The EIS should include comments from Hawaii State Department of Transportation and Hawaii County Civil Defense, Police, and Public Works on this policy re munitions.

- N34-22
- Chapter 2 p 3-4 "nonlive fire (blank ammunition)...Blank ammunition contains powder..."

The EIS must specify what is in the powder and evaluate hazards to soil, water, wildlife, cattle, and people using meat or milk from the cattle.

- N34-23
- Chapter 3 p 8 "UXO hazards along the Saddle Road corridor...need to be cleared..."
- UXO should be cleaned, or a commitment to full removal made, before new UXO is produced.*

Responses

the land as a result of a 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 FUDS program.

N34-18

Thank you for your comment and your participation in the public process. The Army acknowledges that there may be some impact from these activities but believe it would be less than significant because the likelihood of evacuations or road closures is low and their duration, if required, would be short. Section 8.2 has been changed to reflect this. As a mitigation measure for safety, 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 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 FUDS program.

N34-19

Risk of soil contamination and risk to human health and the environment are two separate and very different types of risk. The EIS describes how we arrive at the conclusion that the soil contamination present on the ranges does not currently present a significant risk to human health or the environment. The Army is responsible for uncontrolled release of contaminants to the environment, and will be required to remediate the contaminants appropriately before turning over the land to civilian uses. However, in its current use, there is no significant risk from the contaminants present. The Transformation EIS does not address closure of installations. That would be addressed in a separate EIS prior to closure.

N34-20

We share and understand your concern on this issue. Our soldiers and their families live and work on our installations. As summarized in Section 4.12, the Army proposes mitigation measures to include UXO clearance activities prior to construction and during training activities to reduce the overall UXO accumulation and potential risk to human health and safety through the life of the project. This issue has the highest level of attention at the Department

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- Section 3.12: Human Health and Safety Hazards

N34-24

The military uses many substances that are confidential or proprietary. Some of these substances have not been adequately studied to determine their impacts on human health or the environment. Are any classified substances going to be used in the project areas that may have a significant impact on human health or the environment but are not yet classified as hazardous or toxic because of their secret nature? What substances have been detected at the project locations on O'ahu and the Big Island that have yet to be tested for their toxicity or long-term health impact?

N34-25

Information on perchlorate must be included: current and proposed level of use; indications of past contamination of water and/or food; present and future measures to prevent contamination. Perchlorate was found in supermarket milk in Texas at levels exceeding the federal safe dose for drinking water. Perchlorate is the explosive main ingredient of solid rocket and missile fuel. It disrupts thyroid hormone levels and can cause lowered IQ, loss of hearing and speech, and motor skill deficits.

- Chapter 3 p 80 and Appendix K

N34-26

There is no hazardous waste report for Pohakuloa—this should be included

N34-27

- Chapter 3 p 82 "...on a squad battle course, where there are no established firing points, units will have to return to where they fought the biggest battles and retrieve what they can. All ASPs [ammunition storage point] require that a certain percentage of weight...be returned. If the unit is short, they either go back...and find more residue...or the commander signs a statement...that it is not practical to try to retrieve any more residue."

The EIS must estimate how much residue is expected with the 25% increase in ammunition use, and evaluate the hazards to soil, water, and wildlife.

N34-28

- Chapter 3 p 85 "Lead is...used in manufacturing ordnance/ ammunition, such as that used for small arms training. Lead accumulates in backstops, range floors, and berms and can leach into groundwater, be carried off-site by stormwater, be ingested by wildlife, or become airborne. Erosion can overload streams and rivers with sediments...when looking at the risk of lead migration, both the total number and type of rounds fired must be taken into consideration."

The EIS must estimate how much lead is expected with the 25% increase in ammunition use, and evaluate the hazards, short and long-term, to soil, water, and wildlife.

N34-29

- Chapter 4 p 22 "...synthetic dust control chemicals might prove to be a more appropriate mitigation strategy...Initial dust control effectiveness is typically over 90 percent, but it declines over time. Control effectiveness values of over 50 percent generally can be expected for periods of 30 to 60 days under heavy use conditions...Army tests...indicated that calcium chloride solutions were more effective and longer lasting than various synthetic polymers or calcium lignosulfonate. Use of chemical dust suppressants would be a feasible method to control fugitive dust..."

Responses

of Army and it is addressed by a centrally managed program that involves the identification, investigation, evaluation, and, if needed, remediation of potential sites. This program, called the Installation Restoration Program, is coordinated with the state and the US EPA to insure compliance with all laws and regulations. It is not, however, possible to estimate cost or time required related to a specific site until the evaluation phase has been completed. The Army is committed to cleaning up existing sites in accordance with applicable laws regulations. In addition, if the Army chooses to relinquish ownership of the land as a result of 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 FUDS program.

N34-21

The Hawai'i State Department of Transportation, Hawai'i County Civil Defense, Policy and Public Works were all provided a copy of the Draft EIS and an opportunity to respond. For those state agencies that commented, their comment letters and the Army response are included in Appendix P of the Final EIS.

N34-22

These results and their potential affect on surface soil and water pollution are further discussed in Sections 4.8 (Water Resources) and 4.9 (Geology, Soils, and Seismology). The investigation report is included in Appendix M1. Gunpowder consists of about 75 percent potassium nitrate, and the rest is inert (for example, charcoal and sulfur). The gunpowder used in small arms ammunition is almost entirely burned upon firing, resulting in discharge of gases (nitrogen, carbon dioxide, sulfuric acid vapor). Potassium nitrate is also used in fertilizer. No impacts to soil, water, groundwater, or human or environmental receptors are expected to result from the minute quantities resulting from firing small arms ammunition.

N34-23

We share and understand your concern on this issue. Our soldiers and their families live and work on our installations. As summarized in Section 4.12, the Army proposes mitigation measures to include UXO clearance activities prior to construction and during training activities to reduce the overall UXO accumulation and potential risk to human health and safety through the life of the project This issue has the highest level of attention at the Department of Army and it is addressed by a centrally managed program that involves the

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N34-29 cont'd | *The EIS must evaluate hazards from dust control chemicals to soil, water, wildlife, cattle, and people using meat or milk from the cattle.*

- **Chapter 4 p 46-47** "The Proposed Action could result in significant chemical residue spills on the surface soils that could affect the surface water quality at...PTA. Accumulation of chemical residues in surface soils or occasional spills that may occur during routine training activities can also contribute to degradation of surface water quality...Recent soil sampling at...PTA provided information about concentrations of explosives, semi-volatile organic compounds, and metals in surface and near-surface soils...The results indicated sporadic occurrence of contaminant concentrations greater than EPA [Environmental Protection Agency] preliminary remediation goals (PRGs)...Concentrations of lead that exceeded residential or industrial soil PRGs in some samples may be due to disintegration of bullets...Concentrations of RDX, [from explosives] and other soluble contaminants, in the samples collected from PTA could affect surface and groundwater but are unlikely to result in significant impacts on these media due to the lack of permanent surface water and the great depth to groundwater."

What are the cumulative impacts of adding more ammunition if contaminant concentrations are already exceeding PRGs?

N34-31 | • **Chapter 4 p 49** "Surface water quality may be affected indirectly by increased erosion cause by wildland fires. This could create a significant impact on surface water quality at...PTA...Live-fire training activities on the ranges at...PTA increase the potential for fires...Fires can also generate toxic chemicals that have the potential to enter streams via runoff. Most of these chemicals are naturally occurring, although some may be generated by burning of plastics or other man-made materials."

The full impacts to surface water quality must be disclosed.

- **Chapter 4 p 49** "Residues of explosives and other constituents of munitions would continue to be deposited on soils on training ranges at...PTA."

The EIS must estimate how much residue is expected with the 25% increase in ammunition use, and evaluate the hazards to soil, water, and wildlife.

N34-32 | • **Chapter 8 p 193**: "the quantity of ammunition rounds...on all Army training ranges in Hawai'i would increase from 16 million to 20 million rounds per year, a 25 per cent increase..."
All ammunition must be clearly labeled, including depleted uranium. An exemption allows the military to ship DU with "explosive" but not "radioactive" labels. This exemption creates danger for residents, police, fire, and civil defense, and should not apply.

N34-33 | A "nuclear, biological, and chemical vehicle" will be delivered in 2004 (US General Accounting Office Report to Congressional Committees on Military Transformation: Army Actions Needed to Enhance Formation of Future Interim Brigade Combat Teams, May 2002)

The impact of these vehicles must be addressed in the EIS.

Responses

identification, investigation, evaluation, and, if needed, remediation of potential sites. This program, called the Installation Restoration Program, is coordinated with the state and the US EPA to insure compliance with all laws and regulations. It is not, however, possible to estimate cost or time required related to a specific site until the evaluation phase has been completed. The Army is committed to cleaning up existing sites in accordance with applicable laws regulations. In addition, if the Army chooses to relinquish ownership of the land as a result of a 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 FUDS program.

N34-24

Chapter 4.12 of this document discusses the methods assessed in evaluating potential human health and safety hazards from the proposed action. As discussed in this section, the Army has determined that the general public or soldiers would not experience a significant level of exposure to hazardous or toxic substances as a result of this proposed action. The Army abides by and will continue to abide by all appropriate laws and regulations in the handling and use of hazardous or toxic substances regardless of the security classification of that substance.

N34-25

Perchlorate was included in the analytical suite for the soil sampling on the ranges at PTA and SBMR. It was not detected. There is no reason to think that perchlorate is present at environmentally significant concentrations from munitions use. The combustion of perchlorate results in formation of small quantities of hydrogen chloride in the atmosphere. Chloride is a major constituent of sea water (table salt is sodium chloride). The non-detection of perchlorate was expected. Sites at which perchlorate has been identified as an environmental concern are typically associated with larger scale use or production of rocket fuel or explosives, and was typically disposed with process wastewater. No analogous conditions occur now or are expected to occur under the project.

N34-26

Since all hazardous materials go through SBMR or Wheeler, there are no hazardous waste reports for PTA.

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N34-34

- Chapter 8 p184 "PTA operates its own TAP [transfer accumulation point] site, where it stores hazardous waste for a maximum of 90 days before a contractor picks it up and transports it to the DRMO, [Defense Reutilization and Marketing Office] where it is shipped off-island for permanent disposal at a certified hazardous-waste disposal site..."

Materials from the test pit at Waiakea Forest Reserve, where germ and nerve agents were tested, were taken to the PTA trash dump about October 1970, according to an Army memo. Were the materials transported out following this protocol?

N34-35

- Chapter 8 p184 "There have been no accidents involving the transport of ammunition in the last two years."
- Chapter 8 p185 "During the last 24 months, there were no accidents pertaining to the transporting, storage, or firing of ammunitions at PTA that risked public safety"

Have accidental involving transporting, storage, or firing of ammunitions at PTA occurred in the last 5 years?

N34-36

- Chapter 8 p186 "Results from recent range soil sampling revealed metals, explosives, and SVOC [semi volatile organic compound] levels above EPA [Environmental Protection Agency] Region IX residential and industrial PRGs [preliminary remediation goal] on PTA ranges."

The EIS must discuss risks to soil, water, wildlife, and humans, and spell out measures that will be taken for cleanup and prevention of further contamination.

N34-37

- Chapter 8-193 to 8-194 "...under the Proposed Action, the quantity of ammunition rounds fired during Army training on all Army training ranges in Hawai'i would increase from 16 million to 20 million rounds per year, a 25 per cent increase primarily consisting of small arms munitions (97 percent of the total increase)..The proposed increased level of training could elevate contamination levels in range soils by 25 percent...in the event any active range is closed and transferred out of DoD [Department of Defense] control. All remediation necessary to mitigate an imminent threat to human health and the environment would be undertaken at such time."

Small arms ammunition contains lead. The EIS must spell out threats to soil, water, wildlife, and humans, and remedies. Remedies should be implemented while training is active, not when the base is closed.

N34-38

- Chapter 8 p 199 "The 105mm cannon on the Stryker mobile gun systems and the 120mm mortar are the only new weapons to be introduced at PTA under the Proposed Action. The amounts of other weapon systems would also be increased with the elevated level of training proposed in the transformation. Although the Proposed Action would generate a significant increase of ammunition use (an additional four million rounds) due to the elevated level of training and expansion in military force, the impact of this increase would not be significant as management of artillery and ammunition would not change...Excess ammunition not used during training [may be transported by]...commercial carrier to...WAAF [Wheeler Army Air Field]"

N34-27

These results and their potential affect on surface soil and water pollution are further discussed in Sections 4.8 (Water Resources) and 4.9 (Geology, Soils, and Seismology). The investigation report is included in Appendix M1. While the rate at which metallic lead from bullets would be deposited on the ranges would likely increase by 25 percent overall, the concentrations of lead that would be detected in soil samples taken at some future date would not increase by this amount. There are several reasons for this. The current concentrations of lead in soils are the result of years of past use of the ranges. The lead comes from the gradual weathering and disintegration of bullets in addition to other possible sources of lead in munitions, all of which is in addition to the natural background concentration of lead in the soils. Each year, more bullets accumulate on the ranges, adding slightly to the average concentration of lead present in the soils. Some of the lead is removed with soils through erosion. Some migrates deeper in the soil column. Also, much of the increased use of bullets will occur on small arms firing ranges where the bullets are deposited in small target areas. Therefore, the additional lead projectiles will not be widely dispersed on the ranges. Therefore, it is likely that the rate at which lead is deposited on ranges will decrease, while the concentration of lead in soils will continue to increase for a time, and then decrease when lead bullets are phased out. Since the lead is widely distributed, except in the small arms target ranges, the rate at which concentrations in soils increase in any particular location should be very low. It should also be noted, as mentioned in the EIS, that the Army is evaluating a gradual shift from use of lead-containing ammunition to use of "green ammunition" that does not contain lead.

N34-28

Under the No Action Alternative, lead projectile ammunition would continue to be used in training and lead metal would continue to accumulate on the ranges at about the rate it has in the past. No data are available to quantify the amount of lead metal per acre that is present on the ranges, or to accurately estimate the rate of accumulation of lead metal from firing of small arms. The rate of accumulation would differ widely from location to location, depending on intensity of use. Assuming 16 million rounds per year under the No Action Alternative, and that each round contains an average of approximately , Metallic lead represents a low environmental hazard. Military small arms projectiles have been made with a hardened alloy of lead and antimony, which is less soluble than pure lead. Lead metal weathers slowly in the environment

Appendix P. Comments and Responses

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Sierra Club Comments on Stryker Brigade expansion DEIS Page 13

N34-38 cont'd *There will be much more excess ammunition, so there will be significant impact, especially if commercial carriers are transporting some of it. Impacts and mitigation need to be spelled out. All ammunition must be clearly labeled, including depleted uranium. An exemption allows the military to ship DU with "explosive" but not "radioactive" labels. This exemption creates danger for residents, police, fire, and civil defense, and should not apply.*

WATER USE

N34-39

- The October 14th, 2003 *Hawaii Tribune Herald* states that 500,000 gallons of water a year will be needed for the vehicle wash.

The EIS must state where the water will come from in this dry area. If it will be trucked in, the EIS must address supply, noise, and traffic problems.

N34-40

- Chapter 8 p 210 "the water supply is now hauled by tanker trucks from the town of Waimea...Excess demand can be supplied by the City of Hilo..."

With additional troops more truckloads will be needed. The EIS should spell out where the additional water trucks will come from, and the impact on noise, air quality, traffic, and County and State expenses for road maintenance.

LAND USE

N34-41

- "The following are steps required for significant major acquisitions of training land at Army installations:
(1) Land Use Requirements Study
(2) Analysis of Alternatives Study
(3) Environmental Impact Study
(4) Real Estate Planning Report
(5) Decision on Land Acquisition
(6) Decision on Programming [sic] Priority
(7) Congressional Approval
(8) Acquisition by the Corps of Engineers"

Per an April 27, 1990 memo on Land Acquisition and Disposal in the United States to the Assistant Secretary of Defense from Susan Livingstone, Assistant Secretary of the Army. The Analysis of Alternatives should have been done before the EIS. All steps must be followed.

N34-42

- Executive Summary p 48 Construction of the new range control building at PTA could have significant impacts on cultural resources, depending on its location."

The EIS must specify the location of the range control building so the impacts can be evaluated.

N34-43

- Chapter 2 p 21 "Land ...is a priceless nonrenewable asset that must be responsibly managed to support the national defense mission....USARHAW adheres to five basic concepts...[one is] meeting...environmental concerns..."
- Chapter 3 p 10 (quoting form from County of Hawaii General Plan 1989): "long-range

forming soluble or relatively insoluble compounds depending on the chemical conditions in the soil. Not all of the lead in soils is from weathering of lead bullets. Some explosive munitions may contain small quantities of lead compounds used in propellants or initiators. Soils also contain natural background concentrations of lead from minerals in the parent rock. The rate of weathering of metallic lead is a function of surface area of the metal exposed to atmospheric conditions or soil moisture. Lead concentrations are expected to be highest in the soils in contact with, or in the immediate vicinity of a projectile undergoing weathering. Over time, the lead becomes more dispersed. Continued use of lead projectiles in small arms rounds under the No Action Alternative will lead to continued accumulation of lead metal on ranges, which in turn will result in more surface area of lead metal exposed to weathering. On average, the observed concentrations of lead in soils are quite low, and the weathering process is very slow. The Army is examining the use of "green ammunition" that does not contain lead, to replace ammunition that contains lead projectiles.

N34-29

The Air Quality and Water Resources sections (Sections 4.5, 4.8, 5.5, 5.8, 6.5, 6.8, 7.5, 7.8, 8.5, 8.8) have been expanded to discuss proposed dust palliative treatments and potential impacts or considerations for their use. If the Army decides to implement the Proposed Action, the Army proposes to use "environmentally friendly" dust control measures that would have less than significant impacts on water resources.

N34-30

Sections 4.9, 4.12, 8.9 and 8.12 discuss the impacts from potential contaminants in soils. The soil sampling showed that contaminants occurred over a range of concentrations, as would be expected. Some of the concentrations exceeded EPA PRGs. However, when taken together, the exposure risks were generally well below the EPA threshold criteria. The soil investigation of the ranges was designed to determine if there is an overall risk of exposure to the public or military personnel by changes in range designs in the Proposed Action. US EPA PRG levels were used as a reference criteria for this analysis. Based on comparison of the investigation results to US EPA PRGs, the human health and environmental risks from the cumulative results of past activities at the ranges appear not to be significant. Some contaminants degrade more slowly than others. Those that degrade more slowly will tend to accumulate more quickly in soils, while those that degrade quickly may

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N34-43
cont'd

goals...Protect, preserve and enhance the quality of areas endowed with natural beauty, including the quality of coastal scenic resources; Protect scenic vistas and view planes from becoming obstructed; and Maximize opportunities for present and future generations to appreciate and enjoy natural and scenic beauty."

The EIS should explain how leaving the over 50 former military sites on Hawaii Island in hazardous condition and how dust, severe erosion, runoff into the ocean, and threats to native species and cultural sites on the 23,000 acres follows these principles.

- Preservation of Agricultural Lands

N34-44

The transformation of lands from agricultural to military training ranges is an alteration that, historically, is permanent in Hawaii. The military has shown its unwillingness or inability to clean up after itself time and again in Hawaii (Makua, Kaho'olawe, etc.), and thus the conversion of any agricultural land should be heavily weighed against the consequences. In this island ecosystem, lands suitable for agriculture are not many. Areas suitable for agriculture are limited by the steep terrain of the Ko'olau and Wai'anae Mountains, as well as the dry conditions on the leeward side of the island. In addition, urban and residential growth, along with the importance of preserving forested watersheds, further limits agricultural areas. Thus it is very important to preserve the few areas that are currently designated for agriculture.

N34-45

- Chapter 4 p 4 "Examples of projects conflicting with land uses include converting agricultural land to training land...and constructing FTI [fixed tactical internet] in a Conservation District."

The EIS should detail the full impacts from these incompatible uses.

N34-46

- Chapter 4 p 4 "...the Farmland Protection Policy Act of 1981...is intended to minimize the impact of Federal programs have [sic] on the unnecessary and irreversible conversion of farmland to nonagricultural uses..."

The EIS must spell out how the FPPA is being followed.

N34-47

- Chapter 4 p 5 "The Army...will submit a CZM [Coastal Zone Management] consistency determination to the State Office of Planning."

This should be completed and included in the draft EIS, then comments from the public should be taken again on the complete draft EIS.

N34-48

- Chapter 4 p 7 "The Army is considering establishing cooperative relationships...to allow...continued grazing activities at the WPAA, [West PTA Acquisition Area] in conjunction with training..."

The EIS must address the health risks of beef or milk cattle grazing on land contaminated by chemicals used for dust control and powder from blank ammunition. The EIS must spell out how continued grazing will add to the severe erosion which it states the Strykers will cause.

N34-49

- Chapter 4 p 18 because the "clear zone and accident potential zones that extend beyond each end of the runway...must be cleared, graded, and free of objects, there is

decrease, depending on use. The initial sampling of the ranges suggests that explosives degrade quickly relative to the rate of deposition. Lead and some other metals may accumulate over time. However, the rate of accumulation will be slow, and in the case of lead, for example, may be reversed in the future by the substitution of "green" ammunition for lead-alloy projectiles.

N34-31

The discussions in Sections 4.8, 4.9, 8.8 and 8.9 have been expanded in the Final EIS to better discuss the relationship of the impacts to surface water quality and soils erosion from the Proposed Action. The Army determined that the impacts to soil loss from training activities would be significant and the impacts to surface water quality and soil erosion from wildland fires would be significant but mitigable to less than significant. Mitigation measures discussed in these sections would reduce the severity of the impact.

N34-32

No depleted uranium has been used or is currently being used on the island. No depleted uranium is planned to be used in the future.

N34-33

These vehicles are hazardous response vehicles and do not carry nuclear, biological, or chemical materials in them. Their impacts are the same as any other Stryker vehicle.

N34-34

EPA began regulating the treatment, storage and disposal of hazardous materials under RCRA in 1976. All hazardous materials today are transported and disposed of in accordance with applicable federal, state, and Army laws and regulations. We could not find any information regarding the disposal of materials from the test pit at Waiakea Forest Reserve in the early 1970s referred to in this comment.

N34-35

To the Army's knowledge, there have been no accidents to the public due to storage, transportation or use of ammunitions in recent history. The Army continues to manage the storage, transport and firing of ammunitions at all ranges, including PTA, in a manner that creates no safety hazards for the public.

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- N34-49 cont'd** the potential for indirect impact on land use or biological and cultural resources."
These impacts must be detailed.
- Section 5.2: Preservation of Forest Reserve lands
- N34-50** *Any lands that have been designated as Forest Reserve have been determined important to the maintenance of watershed health. On O'ahu, where fresh water supply is at or near the sustainable yield, maintaining and preserving existing watersheds is of utmost importance. How will the Army protect and enhance existing watershed areas? How will the Army preserve the native and/or endangered species that exist in the Forest Reserve? Please provide maps that delineate forested areas in section 5.2.*
- Stream Preservation
- N34-51** *The construction of roads should adequately preserve the current natural streambed, flow, and aquatic habitat of existing streams by using bridge crossings instead of culverts or channels. Hawaii's streams have already been significantly altered, and in many cases the native species are in extreme decline or can be no longer found. Every effort should be made to preserve and protect the existing streams.*
- N34-52** • Chapter 8 p 4 "The location of these [28 miles of] gravel-training roads is as yet undetermined."
Road locations must be specified so impacts can be evaluated.
- Chapter 8 p15 map of "Agricultural Lands of Importance to the State of Hawaii"
- N34-53** *It looks like about 75% of the 23,000 acres are agriculture lands of importance. How will taking this amount of important agricultural lands affect the state's goal of increasing diversified agriculture?*
- Chapter 8 p 27 "The proposed training land use of agricultural grazing land at the WPAA is not consistent with the land use set forth in the County of Hawai'i General Plan (County of Hawai'i 1989), and the County of Hawai'i Zoning Code (County of Hawai'i 2001b)...The WPAA would convert two percent of their total designated agricultural lands on the island...to military training land...This would be a less than significant impact."
- N34-54** *The EIS must spell out the criteria used to conclude this is "less than significant."*
- Antenna Construction Aesthetic Impacts
- N34-55** *Specifically how will the Army minimize the impacts of antenna construction within the surrounding visual landscape? How tall will the antennas be, and what color? Will they be visible to the public from hiking trails, roads, or homes?*
- N34-56** • Section 8.2 (pg.31): Visual Resources: "landscape has panoramic views between Mauna Kea and Mauna Loa of high quality...with dramatic views..." "Views by the public is by driving by only, without stopping causing no significant visual impact"

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N34-36

These results and their potential affect on surface soil and water pollution are further discussed in Sections 4.8 (Water Resources) and 4.9 (Geology, Soils, and Seismology). The investigation report is included in Appendix M1. The results of the investigation indicate that there are no significant impacts to human health or the environment from residual chemical contaminants on the ranges.

N34-37

The potential impacts from ammunitions are discussed in Section 8.12 and mitigation measures are proposed to address potential lead contamination. While the rate at which metallic lead from bullets would be deposited on the ranges would likely increase by 25 percent overall, the concentrations of lead that would be detected in soil samples taken at some future date would not increase by this amount. There are several reasons for this. The current concentrations of lead in soils are the result of years of past use of the ranges. The lead comes from the gradual weathering and disintegration of bullets in addition to other possible sources of lead in munitions, all of which is in addition to the natural background concentration of lead in the soils. Each year, more bullets accumulate on the ranges, adding slightly to the average concentration of lead present in the soils. Some of the lead is removed with soils through erosion. Some migrates deeper in the soil column. Also, much of the increased use of bullets will occur on small arms firing ranges where the bullets are deposited in small target areas. Therefore, the additional lead projectiles will not be widely dispersed on the ranges. Therefore, it is likely that the rate at which lead is deposited on ranges will decrease, while the concentration of lead in soils will continue to increase for a time, and then decrease when lead bullets are phased out. Since the lead is widely distributed, except in the small arms target ranges, the rate at which concentrations in soils increase in any particular location should be very low. It should also be noted, as mentioned in the EIS, that the Army is evaluating a gradual shift from use of lead-containing ammunition to use of "green ammunition" that does not contain lead.

N34-38

The Army has expanded the discussion of cumulative impact of ammunitions and UXO to human health and safety in Chapter 9. The Army has determined that in light of past, present and reasonably foreseeable future actions, the proposed action would have a significant cumulative impact on human health and safety hazards from an increase in ammunitions and UXO. All

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N34-56 cont'd The Sierra Club does not believe this statement to be true: photographers, artists and hikers treasure and appreciate these views.

N34-57 Chapter 8 p 28 "Construction of one antenna in the Conservation District Resource Subzone, and within the Mauna Loa Forest Reserve, would result in a less than significant land use."

The EIS should spell out the criteria used to conclude this is "less than significant."

N34-58 Chapter 8 p 36 "Several of the proposed FT1 antennas and support equipment sheds would be within potentially sensitive viewsheds...Although the proposed locations are prominent features from public roadways, they are not unique within the area."

The EIS should detail the visual impacts caused by adding more structures to this area.

N34-59 Chapter 10 p 11 "The conversion of important farmland to military use at PTA and SBMR [Schofield Barracks Military Reservation] could affect long-term agricultural productivity in Hawai'i, but under current law, conversion of important farmlands is exempt from mitigation requirements if the conversion is necessary for national defense."

Reducing agricultural productivity makes Hawai'i more dependent on imports, and at risk from natural and human events which stop imports. What are the economic tradeoffs with decreasing the amount of important agricultural lands in Hawai'i?

N34-60 Appendix D p 51 two 42-foot antennas/ masts at Auwaiakeakua WT and Koloa WT, two 20-foot antennas/masts at Pu'u Kanalapakanui and Pu'u Keekee in WPAA [West PTA Aquisition Area.] [bold added]

How will these affect scenic resources?

N34-61 Appendix N p 6 "In some areas, the SMAs [special management areas] currently extend several miles inland to cover areas in which coastal resources are likely to be directly affected by development activities...construction of...PTA trail...may require a SMA Use Permit...this permit would need to be approved by the County of Hawai'i Planning Commission."

What is the alternative if the Commission doesn't approve the SMA permit?

N34-62 Appendix N pp 1-2 "The Farmland Protection Policy Act...is intended to minimize the extent to which Federal activities contribute to the conversion of farmland to nonagricultural uses. It also stipulates that federal programs be compatible with state, local, and private efforts to protect farmland—for example, Hawai'i's land use law (Act 187) which designates agricultural district lands. Federal agencies are required to examine the impact of any activity that would convert farmland...Because...portions of the West PTA Acquisition Area and PTA Trail easement...may be subject to the requirements of the FPPA, the Army has requested a farmland determination from the NRCS, which evaluates the impacts of converting farmland areas to nonagricultural use."

commercial carriers are required to follow strict protocol in the transportation of ammunition to ensure safety. The Army assumes that these carriers are following all requirements for their permits. No depleted uranium has been used or is currently being used on the island. No depleted uranium is planned to be used in the future.

N34-39

As discussed in Section 8.14, current water demands at PTA (ranging between 3.6 million and 50 million gallons of water per year) are met by trucking in water in 5,000-gallon tankers from Waimea. The increased demand would fall within the range of water demand experienced currently and is not expected to adversely affect supply. Traffic increases would total fewer than two extra truckloads per week.

N34-40

As discussed in Section 8.14, current water demands at PTA (ranging between 3.6 million and 50 million gallons of water per year) are met by trucking in water in 5,000-gallon tankers from Waimea. The increased demand would fall within the range of water demand experienced currently and is not expected to adversely affect supply. Traffic increases would total fewer than two extra truckloads per week.

N34-41

Thank you for your comment and your participation in the public process. Your comment has been considered and has been included in the administrative record for this process. The Army is following all appropriate laws and regulations in the consideration of the Proposed Action. An analysis of alternatives study has been completed for each of the proposed land acquisition actions and is available upon request. If the Army decides to implement the proposed action, Steps 4 through 8 would begin after a Record of Decision has been issued.

N34-42

Figure ES-4 is provided as an overview of project locations in the Executive Summary. Table 2-4 lists all of the projects and directs the reader to Appendix D for details as does Section 2.3.2. Appendix D provides detailed maps and descriptions of all projects including the proposed range maintenance facility and range control building..

Appendix P. Comments and Responses

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N34-62 cont'd *Since this determination was not included in the draft EIS, the public was deprived of its right to comment. This determination must be included.*

Beneficial mitigation

N34-63 *The Sierra Club requests that the Army mitigates any expanded training by assisting non-profit conservation organizations in the purchase of buffer areas near training areas. ACUB's (Army Compatible Use Buffers) provide an actual net benefit to the local effected communities. O'ahu training areas have already been listed by the Army's Deputy Director of Training as a top national priority for buffering. Before any Stryker activity begins, the Army should request funding for and partner with local conservation non-profits to buffer impacted training areas.*

PUBLIC ACCESS

- Public Hunting Access

N34-64 *Oahu's forests have been degraded and stressed by feral goats and pigs. It is important to maintain native forest ecosystems to preserve biodiversity and watershed integrity. We believe it is not an option to allow pig and goat populations to grow, especially in native or sensitive ecosystems. Pigs and goats eat native vegetation, dig up areas enough to cause erosion problems and landslides, degrade stream water quality, and facilitate the ingress and spread of non-native weedy species such as grasses, blackberry, and strawberry guava. These weed threats, in addition to direct predation, threaten and harm native and endangered plant and animal species. How will the Army address feral pig and goat control in areas that are not currently open to hunting?*

N34-65

- Chapter 4 p 70-71 "Potential impacts related to construction...could include destroying or damaging ATIs, [Areas of Traditional Importance] including shrines, archaeological sites, burials, or elements of Native Hawaiian cultural landscapes. Purchasing...the WPAA...and then using [it]...for military training, could limit Native Hawaiian access to and use of sites...for traditional or religious purposes. Mitigation **may** reduce the impact to less than significant. Construction of FTI [Fixed Tactical Internet] antennas...at PTA may result in visual impacts on cultural landscapes...Facility construction or training area uses would be designed to avoid ATIs and limit visual impacts on traditional cultural landscapes...**where feasible**. Mitigation for impacts on the cultural landscape **could** include consulting with the Native Hawaiian community to determine the extent of such impacts and **possible** means of avoiding or limiting them." [bold added]

The terms "where feasible," "could," and "possible" are insufficient. The EIS is not complete without impacts spelled out.

- Section 5.2: Honouliuli Management Access

N34-66 *While the SRAA and QTR2 military range use cannot exceed 242 days per year, it is possible that all of those days will be utilized, leaving only 123 days per year for TNC management access. This averages out to be approximately 2 days per week. This will cause tremendous scheduling restrictions for management activities, which often involve volunteer groups and includes time-sensitive predator control around endangered plant and animal populations.*

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N34-43

The purpose of these concepts are to minimize impacts to the valuable resources of lands the Army is responsible for. They do not guarantee there will be no impacts. The impacts associated with the proposed Transformation are described in the EIS.

N34-44

During the EIS review process, the Army has coordinated with Natural Resource Conservation Service and is compiling with all requirements of the Farmland Policy and Protection Act (FPPA). If the Army decided to implement the proposed action, the management and use of the West PTA acquisition area would be conducted per federal regulations and guidelines. State regulations and guidelines do not apply to federal actions. However, the Army has considered State policies in its overall assessment of impacts in the EIS. In following FPPA requirements, CEQ guidance and Army policy, the Army has determined that the proposed conversion of West PTA acquisition area is consistent with these regulations and guidance and the impact would be less than significant. The farmland conversion rating forms are included in Appendix E of the Final EIS. In addition, the cumulative impacts of Proposed Action in light of past, present and reasonably foreseeable actions by the Army or other parties are discussed in Chapter 9. Based on cumulative impacts, there is a significant impact on human health and safety from an increase in ammunitions and UXO, and increased impacts on biological resources.

N34-45

Discussions of these impacts can be found in more detail in sections 5.2, 6.2, 7.2, and 8.2.

N34-46

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

N34-47

The CZM Consistency Determination and State of Hawai'i letter of concurrence is included in the Final EIS in Appendix E.

N34-48

Conversion of the WPAA to military use is described as a less than significant

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N34-66 cont'd *How will the Army ensure that TNC will have adequate management access? Please provide maps that delineate the TNC management area of Honouliuli Preserve within section 5.2.*

- **Chapter 8 p176-177** "Conducting military training at the WPAA [West PTA Acquisition Area] would limit access to the property. There are cultural resources of Native Hawaiian origin on the property, and it is possible that some of these resources constitute ATIs [areas of traditional importance.] Converting the use of the parcel to military training may also damage or destroy any unrecorded sites...Facility construction or training area uses would be designed to avoid identified ATIs and to limit visual impacts on traditional cultural landscapes...**where feasible**. Mitigation **could** include consulting with the Native Hawaiian community...mitigation would be developed...in accordance with the provisions of the PA." [bold added]

N34-67

"Where feasible" should be deleted. "could" should be "would". It is not clear what the provisions of the PA are, since the PA "may have been revised." The EIS is incomplete without a final PA. The final, not draft, version of the PA must be clearly indicated and included in the EIS.

FIRE

N34-68

- **Chapter 3 p90** "The WFMP [Wildland Fire Management Plan] for Pohakuloa...acknowledges that most fire history files are incomplete...after five years, following the disposition of records, they were destroyed, in accordance with the Modern Army Recordkeeping system..."

The EIS must include a plan for more complete fire records in the future.

N34-69

- **Chapter 3 p91** "According to the WFMP, in the recent past, the entire Hawaiian ecosystem has experienced an increase in wildfire frequency...Causes for the increase in fire frequency include the spread and intensification of alien grasses. On Army land, technological advances in ammunition and supporting pyrotechnic devices used for training have contributed to the fire frequency increase...In 1992, the Army began to reduce the frequency of fires on Army land with the application of a fire prevention and prescribed burn program...[on Oahu] Military live-fire activities start many of the fires within ordnance impact areas..."

The EIS should detail the amount of increase in wildfires from alien grasses, pyrotechnics, and live fire, as well as the impacts of additional fires on ecosystems, air quality, nearby communities, and endangered species recovery programs.

N34-70

- **Chapter 2 p 39** "Nonlive-fire exercises use blank ammunition, laser weapons, and simulated artillery and mortar fire with pyrotechnics."
- **Chapter 4 p 25** "Tracers, flares, and pyrotechnics have the potential for starting wildfires on training range areas. The use of such munitions would increase somewhat under the Proposed Action, with a corresponding increase in the potential for wildfires."
- **Chapter 8 p190** "Tracer ammunition, which easily starts fires and is one of the most commonly used ammunitions, has started the largest number of fires at PTA."
- **Chapter 8 p193-194** "...under the Proposed Action, the quantity of ammunition rounds fired during Army training on all Army training ranges in Hawai'i would increase from

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impact in Section 8.2.2. However, 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. However, as discussed in Chapter 9, the Army acknowledges that the cumulative impact on the conversion of agricultural lands from past, present and reasonable foreseeable future actions would be significant. Any dust palliative used would be "environmentally friendly".

N34-49

Thank you for your comment and your participation in the public process. Your comment has been considered and has been included in the administrative record for this process. These impacts are addressed in Sections 8.2 – Land Use, 8.6 – Noise, 8.10 – Biological Resources, and 8.11 – Cultural Resources.

N34-50

As summarized in Section 4.8, the Army has determined that the impacts to water resources on a project wide basis is significant but mitigable to less than significant. This project wide analysis includes potential impacts to watersheds. The Army minimizes impacts to watersheds through institutional programs such as ITAM as well as abiding by all applicable laws and regulations. As summarized in Section 4.10, the Army has determined that some impacts to sensitive species will be significant. The Army proposed mitigation measures to substantially reduce the severity of the impacts. These mitigation measures are listed in detail in the Biological Opinions issued by USFWS for the current force and Proposed Action on the islands of O'ahu and Hawai'i. These BOs are available upon request.

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N34-70
cont'd

- 16 million to 20 million rounds per year, a 25 per cent increase
- Chapter 8 p199 there will be "...a significant increase of ammunition use (an additional four million rounds)... [at PTA but] ...the impact of this increase would not be significant, as management of artillery and ammunition would not change..."
- Appendix O p1-1 "In the past, military activities on Army lands have burned areas of native vegetation and threatened the habitat of endangered species of plants and animals."

Despite the increase in fire risk detailed in the sections above, it seems little will be done to address fire. What, specifically, will be done to reduce or eliminate the risk of devastating fires? How will the Army ensure that endangered species or their habitats are not destroyed by fire? Is some endangered species loss unavoidable?

N34-71

- Chapter 4 p 83 "...no FMAs [fire management areas] and wildland fire SOPs [standard operating procedures] have been completed for installations where Transformation would occur."

The EIS must spell out the increase in fire risk and proposed mitigation, including FMAs, SOPs, and fire avoidance efforts. The EIS is incomplete without the FMAs and SOPs.

N34-72

- Section 5.5.2, page 5-54: it is stated that the use of tracers and pyrotechnics would result in the "small increase in the potential for wildfires."

Within the last year, O`ahu alone has seen over 10 wildfires caused by training. Most were limited to training ranges, but a few did burn outside of the established firebreak in the endangered forest bird (the O`ahu Elepaio) habitat (SB West Range). We disagree that the potential for wildfires will increase only a small amount, and would like to see the wording changed to reflect the large increase in potential for wildfires.

N34-73

- Section 5.12.2, Hazards: it is stated that weather conditions will be monitored to determine the probability of wildfire caused by training maneuvers.

Will there be set conditions that are known to be high wildfire probability? Will training be put on hold until weather conditions are more favorable for safe training? How will the weather conditions influence the decision of administering a prescribed burn in the future? What changes to the Wildfire Management Plan will be made to insure that another incident, such as the July Makua tragedy, does not occur?

Since the threat of wildfire is one of the most probable threats to endangered species and the native ecosystems upon which they depend, how can this EIS adequately address wildfire mitigation if the WFMP is not included within this document? Please include all appropriate wildfire management plans for each area within the EIS.

N34-74

- Appendix O p1-2 "Prescribed fire will be considered as a viable tool to manage fuels and will be utilized under environmentally appropriate conditions."

Recently a prescribed fire burned out of control in Makua Valley. The EIS must spell out what will be done to prevent a repeat of such a fire at PTA.

N34-75

- Appendix O p1-4 "The Hawaiian ecosystem is not resistant to, nor dependent on

N34-51

As summarized in Section 4.8, the proposed action would not result in significant impacts from stream crossings. The Army has also received a FWA (2) (b) Planning Letter for those activities that would result in the crossing of a stream (See Appendix E). The Army will implement mitigation measures summarized in Section 4.8 and will abide by applicable laws and regulations to minimize impacts from stream crossings.

N34-52

These are internal training roads and their optimal placement and location will not be known until training activities commence. Once the location of the roads are determined, additional NEPA documentation will be completed as needed.

N34-53

As discussed in Section 8.2 and shown on the Farmland Conversion Rating Form from NRCS in Appendix E, there are no designated prime or unique agricultural lands at WPAA. Of the 23,000 acres, approximately 16,266 acres are zoned as important by State or local plans. This represents a total conversion of 0.029 percent of agricultural lands in the county of Hawai'i. The Army has determined that this conversion of agricultural land on a project wide basis is a less than significant impact. As discussed in Chapter 9 - Cumulative Impacts, in light of past, present and reasonably foreseeable future actions, there is a significant impact to land use from the conversion of agricultural lands.

N34-54

Factors considered in determining impact significance are discussed in Section 4.2.

N34-55

Details regarding antenna location, height, and other characteristics are found in Appendix D. As discussed in Sections 4.3, 5.3, 6.3, 7.3, and 8.3, the Army has committed to implementing mitigation for visual impacts by screening construction, mimicking surrounding areas, and other means.

N34-56

Section 8.2 has been updated to address the comment.

Comments

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N34-75
cont'd

fire...Wildfire is the single largest impact made by military activities in the Hawaiian ecosystem. The use of Army lands must include fire avoidance efforts."

The EIS must spell out the increase in fire risk and proposed mitigation, including FMAs, SOPs, and fire avoidance efforts.

WATER QUALITY

N34-76

- Section 5.8.2, page 5-110: "No systematic sampling investigations of the major streams or tributaries that drain the watersheds of SBMR have been performed to determine whether or not explosives residues or other chemical pollutants from military training have affected surface water quality."

How can the impact of explosive residues or other chemical pollutants on surface water quality be determined if monitoring is currently not in place? Is it known if the current levels of contaminants are acceptable?

N34-77

- Page 5-111: states it is unlikely that soil contaminants concentrations observed at SBMR ranges would affect water quality due to the nature of contaminants to bind to soil particles.

Don't certain organisms feed directly upon soil sediments in streambeds, particularly plant species and algae, of which are fed upon by other organisms up the food chain? Wouldn't water quality thus be indirectly negatively affected for those organisms living in it?

N34-78

- Section 8.1 (pg.8.2): Construction of Tactical Wash Facility to support a 60' long x 12' wide vehicle, Waste water "would be treated".

How would this waste water be treated?

N34-79

- Chapter 8 p211 "Due to a revision in USEPA regulations, cesspools serving more than 20 people per day must be closed by April 5, 2005"

The EIS should spell out a plan for replacing the cesspools.

N34-80

- Oil and fuel runoff

Oil and fuel from vehicles can pollute stream water if heavy rains wash road residue directly into streams, so what will be done to minimize the impacts to water quality? Will some sort of filtration system be used to treat runoff that is drained into streams? In Hawai'i, best management practices (BMPs) to reduce or mitigate runoff from soil disturbing activities have historically failed at protecting water resources. How will the Army ensure that muddy runoff and pollutants do not degrade surface and ocean water quality?

BIOLOGICAL RESOURCES

N34-81

- Executive Summary p41 "Project-wide impacts from impacts from fire on sensitive species and habitat, and federally listed species and designated or proposed

Responses

N34-57

Factors considered in determining significant impacts on land use are set forth in Section 4.2.

N34-58

Visual impacts from construction of FTI antennas are discussed in sections 4.3, 5.3, 6.3, 7.3, and 8.3. The Army has committed to implementing mitigation for visual impacts by screening construction, mimicking surrounding areas, and other means.

N34-59

As summarized in Section 4.2, the Army has determined that this conversion of agricultural land on a project wide basis is a less than significant impact. As discussed in Chapter 9 - Cumulative Impacts, in light of past, present and reasonably foreseeable future actions, there is a significant impact to land use from the conversion of agricultural lands.

N34-60

Visual impacts from construction of FTI antennas are discussed in sections 4.3, 5.3, 6.3, 7.3, and 8.3. The Army has committed to implementing mitigation for visual impacts by screening construction, mimicking surrounding areas, and other means.

N34-61

No proposed activities will occur until the Army has abided by all appropriate laws and regulations and received all applicable permit approvals. If a permitting authority proposes to deny a permit, the Army will work with the permitting authority to redesign the project and/or implement permit conditions as appropriate in order to obtain permit approval.

N34-62

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

N34-63

The Army is considering ACUBs as mitigation for other proposed actions and has met with the commenter. For this action ACUBs were also considered but more feasible mitigation measures were proposed. The mitigation measures proposed are listed in the Executive Summary.

Comments

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N34-81
cont'd

critical habitat would result in overall significant impacts not mitigable to the less than significant level...**Impacts on sensitive species from the spread of nonnative species, and impacts from loss and degradation of sensitive species and habitat** would be significant and mitigable to the less than significant level on both the installation specific and project-wide level."

What will the significant impacts to listed and sensitive species be, exactly? Would the likelihood of survival for some species be diminished?

N34-82

- Executive Summary p 58 To mitigate impact on natural resources from introduction of alien species, a vehicle wash is proposed at Kawaihae Harbor, if utility requirements and space permit.

Keeping alien species out is extremely important to Hawaii's ecosystems. If a vehicle wash is not constructed, the probability and the impacts of new species introductions must be fully disclosed.

N34-83

- Executive Summary p 51 The State or County is responsible for building a visitor center at PTA to mitigate impact on cultural and natural resources.

A visitor center is not acceptable mitigation for destruction of cultural and natural resources. The EIS must spell out a plan to avoid destruction of cultural and natural resources.

N34-84

- Page 5-163: no off-road maneuver training or dismounted training will occur on or near federally designated or proposed critical habitat.

The USFWS recently excluded the USAGHAW from designation of plant critical habitat, thereby raising the concern that those federally listed species would not be adequately protected. How will the Army protect endangered plant habitat even though it may not be federally designated critical habitat? Will the Army be conducting off-road or dismounted training maneuvers within or around endangered species?

N34-85

- Page 5-164: the ecosystem management plan would help to lessen the impact to listed species and their federally designated habitat.

Previously it was stated that the USAGHAW was "considering" implementing such a plan. Will the Army certainly construct and administer such an ecosystem management plan? Where will the funding come from? Will the funds be available before the implementation of the transformation? What protection will be awarded for federally listed species with no critical habitat designation on Army lands? Please include the results of the Section 7 consultation with the USFWS in reference to impacts of transformation actions and training maneuvers on federally listed species and their habitat.

N34-86

- Page 5-164: the current lack of public hunting access, pig and goat populations are not expected to increase.

Please provide evidence of this reasoning. Without population control measures, it is highly probable that feral ungulate numbers will continue to increase. Please provide data on current and past feral ungulate population trends. What will the Army do to mitigate feral ungulate impacts to endangered species and their habitat?

N34-64

As discussed in Section 5.10, 6.10 and 7.10, there is no anticipated impact to biological resources from increased ungulate activity associated with the Proposed Action. However, as discussed in Section 8.10, the Biological Opinion issued by USFWS for ESA Section 7 consultation on the Proposed Action at PTA requires that a large portion of existing Army land that supports prime habitat for endangered species be protected from impacts associated from feral ungulates. The BO is available upon request. The Army will continue to work with the community through current programs to allow hunting access where there is no threat to human health and safety or interference with Army training activities.

N34-65

Mitigation measures are now more specific. The ROD will specify which mitigation measures will ultimately be implemented. Text in the FEIS cultural resource sections has been revised to address public comments.

N34-66

In response to comments received early in the EIS process, USARHAW reoriented QTR2 such that the SDZ would no longer impact any lands with the Honouliuli Preserve. Army will grant TNC personnel and TNC-sponsored personnel daily, controlled access to the TNC-managed lands along a route to be determined by the Army in consultation with TNC for as long as they have legal right to use of the affected property for conservation/stewardship purposes. Access controls will be developed and implemented to ensure the safety of all personnel and will consist of notification by TNC to the Army prior to entering Army lands and notification by the Army to TNC of any unusual activities that may present, or appear to present a danger to TNC personnel in the area. The boundary will be signed to prevent unauthorized use/trespass. Sections 5.11.2 and 8.11.2 discuss access for cultural practitioners.

N34-67

Mitigation measures are now more specific. The ROD will specify which mitigation measures will ultimately be implemented. Text in the FEIS cultural resource sections has been revised to address public comments.

Comments

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- Chapter 8 p 149 "No significant impacts from potential runoff are expected for marine wildlife resources or coral ecosystems."

N34-87 *Currently, from Spencer beach to Kawaihae Harbor extending to one-half mile offshore, coral is known to be covered with silt and dying due to road, residential, and business construction-related storm runoff along Kawaihae Rd and the Waimea area. Any new soil-disturbing activities should take this into account and disclose the cumulative impacts of aggravating the erosion situation.*

CULTURAL AND HISTORICAL RESOURCES

- Executive Summary p 59 mitigation for construction impact on "Native Hawaiian traditional cultural properties and traditionally important places... is not likely to reduce the impact on the Native Hawaiian community to less than significant, if such resources are severely damaged or destroyed..."

N34-88 *Has a cultural impact statement been completed for the Stryker Brigade expansion? Have any interviews of native Hawaiians or native Hawaiian practitioners been completed for this DEIS?*

- Chapter 3 p 76 "USARHAW has developed Cultural Resource Management Plans (CRMP) for the cantonment areas of SBMR, Fort Shafter, Kilauea Military Camp, and WAAF...USARHAW is preparing an ICRMP [Integrated CRMP] for management of the Army's one installation with 28 subinstallations in Hawaii."

N34-89 *The EIS should state whether a CRMP or ICRMP is required for PTA and WPAA. If so, the EIS is not complete without them. They should be included in a new draft EIS which is then put out again for public comment.*

- Chapter 3 p 77 "consultation on the PA [Programmatic Agreement re historic properties] is ongoing...If the PA is not executed, the Army will follow the procedures at 36CFR 800..."

N34-90 *The EIS is not complete without the final PA or the 36 CFR 800 procedures. They should be included in a new draft EIS which is then put out again for public comment.*

- Chapter 4 p 72 "The Army would conduct surveys to identify and evaluate archaeological sites...Construction of...PTA Trail would result in a potentially significant impact on archaeological resources...Some trail or road construction is projected to go through areas with a high potential for archaeological resources and areas that have not been surveyed for cultural resources."

N34-91 *The EIS is not complete without these surveys. The archaeological and cultural resources should be surveyed, identified, and included in a new draft EIS so the public can comment.*

- Chapter 4 p 73 "Construction of the Range Maintenance Facility at PTA would require demolishing Cold War-era buildings, and the BAAF runway scheduled for upgrade may be a Cold War-era historic property as well. The Ke'amuku Village Complex within the WPAA may be eligible for listing on the NRHP. [National Register of Historic

N34-92

Responses

N34-68

The Integrated Wildland Fire Management Plan for O'ahu and Pōhakuolo Training Areas was updated on October 2003 and incorporated lessons learned from the Makua fire and other historical wildland fires. As discussed in the Final EIS Executive Summary proposed mitigation, the Army will fully implement this plan for all existing and new training areas to reduce the impacts associated with wildland fires. The plan is available upon request.

N34-69

The discussions in Sections 4.10, 4.12, 8.10 and 8.12 have been expanded in the Final EIS to better discuss the potential impacts of wildland fires. The impact to biological resources from wildland fires has been changed to significant. The mitigation measures proposed, including the updated IWFMP, will substantially reduce the severity of the impact on biological resources but not to less than significant levels. The updated IWFMP is available upon request.

N34-70

The discussions in Sections 4.10, 4.12, 8.10 and 8.12 have been expanded in the Final EIS to better discuss the potential impacts of wildland fires. The impact to biological resources from wildland fires has been changed to significant. The mitigation measures proposed, including the updated IWFMP, will substantially reduce the severity of the impact on biological resources but not to less than significant levels.

N34-71

Since the publication of the Draft EIS, the Army has updated the Integrated Wildland Fire Management Plan (October 2003). As discussed in Executive Summary proposed mitigation, the Army proposes to implement the IWFMP to reduce the risk of wildland fires. The IWFMP is available upon request.

N34-72

In the Final EIS, the Army has expanded the discussions on the potential risks of wildland fires from the Proposed Action. As discussed in Section 4.10, the Army has determined that the risk to impacts to biological resources from wildland fires is significant. For other resources such as Air Quality (Section 5.5), the impacts from wildland fires is proposed as significant but mitigable to less than significant with the implementation of the updated IWFMP and other measures. The discussions in Sections 4.10, 4.12, 8.10 and 8.12 have

Comments

**N34-92
cont'd**

Places] This site may be put at risk from military use, particularly as a result of training exercises...If Ke'amuku Village could not be avoided or protected from damage, the Army would document the buildings in accordance with HABS/HAER [Historic American Building Survey/ Historic American Engineering Record] and the NHPA. [National Historic Preservation Act]

Ke'amuku Village must be avoided or protected. The EIS is incomplete without the NRHP determination.

N34-93

- Chapter 8 p177 "One FTI antenna will be placed on Mauna Loa...Mauna Loa has been identified as a particularly sacred element of the Native Hawaiian cultural landscape."

The impact of this antenna on the native Hawaiian practices should be discussed. This is equivalent to putting an antenna on a church.

N34-94

- Chapter 8 p178-179 "Facility and range construction...activities...would result in direct damage to or destruction of unidentified archaeological resources..." Proposed mitigation is a "visitor center" with "interpretive displays" and "a small theater for interpretive video or live presentations."
- Chapter 8 p179 "...seven cultural resources identified in the trail corridor, sites near the corridor, and in or near construction staging areas...Many archaeological sites have been identified near the northern end of the trail alignment." Proposed mitigation, again, is a "visitor center" with "interpretive displays" and "a small theater for interpretive video or live presentations."

The EIS is incomplete without identification of archaeological resources. If significant, the resources should be left in place. How do displays and videos compensate for lost resources?

N34-95

- Chapter 8 p 182 "Cables and conduits "could have an adverse affect on the historic integrity of Cold War era buildings or archaeological sites at PTA. The Army is conducting an evaluation of historic structures..."

The EIS is incomplete without this evaluation.

N34-96

- Chapter 8 p 182 "adverse effects would be mitigated by compliance with the...Standards for Treatment of Historic Properties.

Compliance actions specific to PTA must be spelled out.

N34-97

- Chapter 8 p 182 "Impacts on buildings and archaeological sites can be mitigated by compliance with the provisions of the PA."

It is not clear what the provisions of the PA are, since the PA "may have been revised." The EIS is incomplete without a final PA. The final PA should be included in a new draft EIS.

N34-98

- Chapter 8 p182 For the eleven FTI antennas, "construction...would be ground disturbing and could result in adverse impacts on archaeological resources. The Army has conducted a survey of the sites to ensure no impacts on cultural resources."

Detailed survey results should be included the EIS.

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been expanded in the Final EIS to better discuss the potential impacts of wildland fires. The impact to biological resources from wildland fires has been changed to significant. The mitigation measures proposed, including the updated IWFMP, will substantially reduce the severity of the impact on biological resources but not to less than significant levels. The updated IWFMP is available upon request.

N34-73

The discussions in Sections 4.8, 4.9, 4.10, 8.8, 8.9, and 8.10 have been expanded in the Final EIS to better discuss the potential impacts of wildland fires. The impact to biological resources from wildland fires has been changed to significant. The mitigation measures proposed, including the updated IWFMP, will substantially reduce the severity of the impact on biological resources but not to less than significant levels.

N34-74

The Integrated Wildland Fire Management Plan for O'ahu and Pōhakuoloa Training Areas was updated on October 2003 and incorporated lessons learned from the Makua fire. As discussed in the Final EIS Executive Summary proposed mitigation, the Army will fully implement this plan for all existing and new training areas to reduce the impacts associated with wildland fires. The plan is available upon request.

N34-75

Appendix O has been updated with the overview of the October 2003 Integrated Wildland Fire Management Plan (IWFMP). The risks were considered in the development of the IWFMP when developing the specifics of the plan. The IWFMP for O'ahu and Pōhakuoloa Training Areas was updated on October 2003 incorporating lessons learned as a result of the Makua fire. As discussed in the Executive Summary as proposed mitigation, the Army will fully implement this plan for all existing and new training areas to reduce the impacts associated with wildland fires. The plan is available upon request.

N34-76

The conclusion is based on the data available from soil sampling. The analysis shows that although it is unlikely that the contaminants are migrating off site there is a potential for migration in eroded soils. However, implementation of the mitigation measures identified in Section 5.8.2 will reduce this potential to less than significant. Therefore, the EIS does not conclude that there would

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N34-99 • Chapter 8 p182 The IDP would be developed in consultation with the SHPO [State Historic Preservation Office], in accordance with the provisions of the PA [Programmatic Agreement]

It is not clear what the provisions of the PA are, since the PA "may have been revised." The EIS is incomplete without a final PA. The final PA should be included in a new draft EIS.

N34-100 • Chapter 10 p9 "Mitigation for impacts on the cultural landscape could include consulting with the Native Hawaiian community..."

Will consulting with the Native Hawaiian community occur?

NOISE

N34-101 • Executive Summary p 38 "The use of blanks and other training munitions on the WPAA [West PTA Acquisition Area] would produce unweighted peak dB levels in the Zone II range at the Waiki'i Ranch and Kilohana Girl Scout Camp near the installation boundary. Ordnance firing and detonations at PTA might also lead to Zone II noise conditions at the Mauna Kea State Park rental cabins. Project-wide impacts from ordnance firing would be significant."

• Appendix H p 23 chart shows Noise Zone II "Normally Unacceptable" for "noise-sensitive land uses"

The EIS should detail the complete impacts of exceeding "normally unacceptable" noise conditions in these areas.

N34-102 • Chapter 2 p 14 "Combat effects, such as smoke and obscurants, noise, and simulated artillery, nuclear, biological, and chemical conditions, are integrated into training..."

The EIS should spell out how this will effect (and mitigation for) Waiki'i Ranch, Kilohana Girl Scout Camp, Waikoloa, and Waimea.

N34-103 • Chapter 2 p 17 "During some training exercises, aircraft may fly at treetop level or lower...This type of training requires up to 20 helicopters flying in tactical formations...Aircraft pick up soldiers in pickup zones and carry them to landing zones."

If this will occur at PTA the EIS should spell out the noise levels.

N34-104 • Chapter 4 p 31-32 "Noise levels from weapons firing and ordnance detonations...would cause noise levels to exceed the Army's acceptable noise level criteria...in...PTA... At PTA, the use of blanks and other training munitions on the WPAA would produce unweighted peak dB levels in the Zone II range at the Waiki'i Ranch and Kilohana Girl Scout Camp near the installation boundary. Ordnance firing and detonations at PTA might also lead to Zone II noise conditions at the Mauna Kea State Park rental cabins. These noise exposure conditions would be a significant noise impact...An updated ENMP [Environmental Noise Management Program] is in preparation and should be used for exploring feasible ways to reduce the size of existing and proposed Zone III and Zone II noise exposure areas. The ENMP also

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be no migration of contaminants from the ranges to streams, but only that the concentrations are not expected to significantly impact human or environmental receptors with proper mitigation.

N34-77

The pathway to the food web alluded to in the comment does not result in an impact on surface water. Particulates with sorbed chemicals may be suspended in the water column. The chemicals might be detected in water samples that contain the suspended sediment. Some chemicals, such as the chlorinated pesticide DDT, or dioxins, bioaccumulate and become concentrated in higher organisms. This is not the case for explosives and most metals, which are either metabolized or excreted

N34-78

There is no wastewater associated with the Tactical Vehicle Washes. The water is recycled and separated within the vehicle wash. The separated particulates (such as dirt and oils) are removed on a regular basis and disposed of in accordance with appropriate material disposal laws and regulations. The treatment system is described generally in Section 8.14

N34-79

Replacement of the cesspools is not within the scope of the Transformation of the 25th ID(L). As discussed in Chapter 9 - cumulative impacts, the Army is proposing an advanced wastewater treatment upgrade as a separate single and complete action. The Army will abide by all appropriate laws and regulations in the proposed development and design of this upgrade.

N34-80

As discussed in Section 4.8, the Army proposes to expand the existing Spill Prevention and Control plan to all activities under the Proposed Action. The Army maintains vehicles and equipment to reduce the potential for releases. Spills would be cleaned up quickly. If soil erosion threatens water quality or could result in sediment movement and deposition in channels, measures to slow and redirect the runoff could be implemented. The choice of mitigation measures would depend on the specific conditions at the site. The ability to apply appropriate measures to specific land areas rather than to depend on a single approach for every area is one of the strengths of the ITAM program. The Army has determined that there would be an significant impact to water quality from the Proposed Action. The mitigation measures proposed would reduce it to less than significant levels.

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- N34-104
cont'd should explore the feasibility or providing increased acoustical insulation..."
The ENMP must be completed and added to the EIS. Noise is a very important concern for Big Island residents. The EIS is inadequate without complete disclosure of the noise impacts—with or without the ENMP.
- N34-105
 - Chapter 4 p 33 "...at PTA...up to 400 vehicles could be used during a single exercise. If 400 vehicles traveled along PTA trail in a single hour, resulting noise levels would be about...75 dBA at a distance of 50 feet...PTA is well over 1 mile...from the Waiki'i Ranch development and the Kilohana Girl Scout Camp."
 - Appendix H p 5... 75 dBA is "Street sweeper at 30 feet; Idling locomotive, 50 ft"*Noise levels for the distance of 1 mile away should be specified—now it's just a guess what the levels will be at Waiki'i Ranch and Kilohana Girl Scout Camp. It is clear that the noise will increase from current conditions.*
- N34-106
 - Chapter 4 p 34 "...maneuver activities would be expected to produce hourly average noise levels of less than 55dBA at a distance of about 500 feet..., with brief peaks at 65 to 70 dBA...As part of the ENMP, the Army **should consider** establishing a 500-foot...noise buffer at PTA around the Waiki'i Ranch property and the Kilohana Girl Scout Camp property and **should attempt** to minimize nighttime vehicle maneuver activities within 1,000 feet...of those properties." [bold added]
 - Appendix H p 5 70 DBA is "300 feet from a busy 6-lane freeway"
 - 65 dBA is "Typical daytime busy downtown background conditions"
 - 55 dBA is "Typical urban residential area away from major streets"*People go camping or live in the country to escape this kind of noise level. "Consider" and "attempt" are insufficient mitigation for such noise.*
- N34-107
 - Section 5.6.2*Section 5.6.2 does not address the impacts increased noise levels will have on endangered and native animal species. Of particular concern are the endangered O'ahu Elepaio and the endangered tree snails. What impacts will increased noise levels have on endangered plant pollinators? Please provide a map of all endangered plant and animal populations that may be affected by increased noise levels along roadways, vehicle trails, and off-road vehicle maneuvers.*
- N34-108
 - Page 5-70: "Despite increased numbers of vehicles, traffic volumes and vehicle speeds typically would be too low to cause noise problems for areas surrounding roadways and vehicle trails."*Because the Stryker is an off-road military vehicle, which areas will be designated for off-road maneuvers? Because those off-road areas may not surround typical roadways and vehicle trails, what other impacts might Stryker vehicle noise have on surrounding endangered species?*
- Figure 5-15

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N34-81

The discussions in Sections 4.10, 4.12, 8.10 and 8.12 have been expanded in the Final EIS to better discuss the potential impacts of wildland fires. The impact to biological resources from wildland fires has been changed to significant. The mitigation measures proposed, including the updated IWFMP, will substantially reduce the severity of the impact on biological resources but not to less than significant levels.

N34-82

As shown in Table ES-23, the proposed mitigation of placing a vehicle wash at Kawaihae Harbor is unlikely to occur because of logistical constraints including the lack of space and lack of utilities. The Army has identified other mitigation measures to reduce the impact of the spread of non-native species. These are identified in Table ES-22 and Section 4.10. The Army has listed those mitigation measures that are high priority and those that are unlikely to occur because of limited resource, unfeasible or there are similar measures already in place. The ROD will indicate which mitigation measures will be implemented.

N34-83

As shown in Table ES-23, the cultural resource visitors center is not proposed as likely mitigation. There is a cultural resource education center proposed under the PTA Master Plan NHPA Section 106 consultation. The Army has identified more feasible mitigation measures to reduce the impact to biological and cultural resources as discussed in Table ES-22, Section 8.10 and Section 8.11.

N34-84

The outcome of ESA section 7 consultation between the Army and USFWS has resulted in numerous management activities to mitigate any impact to sensitive biological species and habitat. These measures are identified in the individual chapters 5.10,6.10,7.10 and 8.10.

N34-85

The results of ESA Section 7 consultation include the Army development of an O'ahu Implementation Plan. The individual measures determined in ESA Section 7 to mitigate from Army actions are outlined in the biological resource sections of each chapter; 5.10, 6.10, 7.10, 8.10.

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N34-109 | *It has been proven that children in the early stages of development are particularly susceptible to noise pollution, and can be physically and mentally damaged by prolonged exposure to high noise levels. Please delineate the location of any educational or daycare facilities that occur in Zone II and Zone III in figure 5-15.*

- [Page 5-82](#)

N34-110 | On page 5-82 there is a misprint and it is not stated what percentage of Stryker vehicles would comprise the total military vehicles based at SBMR. Please include the percentage.

- [Section 5.7](#)

N34-111 | *Are there any endangered species located within 400 feet of the Helemano Trail or Dillingham Trail? Wouldn't increased noise levels have a significant impact on those species?*

- [Chapter 8 p 3](#) Bradshaw Airfield will accommodate C-17s and C-130s

N34-112 | *The EIS must include routes to the airfield and noise levels under these routes.*

- [Chapter 8 p 64](#) Figure 8-14, Proposed Action Noise Levels at Pohakuloa Training Area

N34-113 | *The figure should include noise from tanks running day and night around Waiki'i Ranch.*

N34-114 | • [Chapter 8 p 65](#) "An updated ENMP [Environmental Noise Management Program] is in preparation and should be used as a mechanism for exploring feasible ways to reduce the size of the predicted Zone II [62-70 dBC noise exposure area and methods for minimizing noise from training ordnance use in WPAA [West PTA Aquisition Area]"

The EIS is incomplete without an updated ENMP.

N34-115 | • [Chapter 8 p 65](#) "The [as yet uncompleted] ENMP [Environmental Noise Management Program] also would explore improved ways to notify surrounding communities about the scheduling and nature of nighttime training exercises...While enhanced public information programs would not reduce actual noise levels, they could help reduce the frequency of noise complaints."

People in Laupahoehoe, miles from Pohakuloa and around the mountain, can hear explosions even at present levels of activity. Increased activity and noise would affect Waiki'i Ranch, Mauna Kea State Park, and Kilohana Girl Scout Camp. Simply warning the public about noise is inadequate mitigation for such noise.

N34-116 | • [Chapter 8 p 70](#) The Stryker makes more noise than a multi-axle heavy truck. "Vehicle maneuvers would occur during both daytime and nighttime hours...the Army would consider establishing a 500-foot...noise buffer around the Waiki'i Ranch property, and the Kilohana Girl Scout Camp property, and minimizing nighttime vehicle maneuvers within 1,000 feet...of those properties."

The buffer zone is inadequate for luxury homes and camping experiences. Will the Army be committed to establishing this zone? Or are they simply just considering it?

N34-86

The text has been revised to say "The prolonged prohibition of hunting in certain areas because of unexploded ordnance has allowed populations of nonnative mammals, such as pigs, to expand. However, no new impact areas would be created in conjunction with the Proposed Action therefore the Proposed Action will not cause any change in the growing ungulate populations." As discussed in Section 8.10, the Biological Opinion issued by USFWS for ESA Section 7 consultation on the Proposed Action at PTA requires that a large portion of existing Army land that supports prime habitat for endangered species be protected from impacts associated from feral ungulates. The BO is available upon request.

N34-87

As discussed in Section 8.9, standard best management practices for erosion control will be implemented to limit erosion during construction of the PTA Trail. This subject is also addressed in the EIS Chapter 9, paragraph titled - "Runoff impacts on marine wildlife and coral ecosystems."

N34-88

Sections 4.12, 8.12, Chapter 9, and Chapter 10 have been expanded to incorporate information from the Maly studies. The Army has determined that project impacts and cumulative impacts to areas of traditional importance is significant.

N34-89

In 1998 an overall CRMP was developed for all ranges. An HPP was done for PTA, but since WPAA has not been purchased one has not been done. Management actions are incorporated in the EIS in Section 4.11.

N34-90

The text has been revised. The Final PA as signed by the Army, SHPO, ACHP and concurring parties is included in Appendix J of the Final EIS.

N34-91

As discussed in Section 8.12, all areas that could be impacted by the Proposed Action have been surveyed for presence/absence of cultural resources. The survey results have been included in the Final EIS. In addition, the cultural resource analysis has been expanded and in some cases the determination has been changed to significant.

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- N34-117** • Chapter 8 p 70 "Noise from Aircraft Operations"
The EIS must include routes to the airfield and noise levels under these routes. Even at current levels, noise from aircraft going to and from PTA is substantial.
- N34-118** • Chapter 8 p208 "...no impact on the health and safety of children..."
Dust and noise will impact children at Waiki'i Ranch and Kilohana Girl Scout camp.
- N34-1119** • Appendix N p 21 "The federal Noise Control Act...directed all federal agencies to comply with federal, state, interstate, and local noise control and abatement requirements to the same extent that any person is subject to such requirements."
The EIS must spell out whether plans for PTA are in compliance. If compliance is impossible, the EIS should detail the impacts of ongoing non-compliance.
- EROSION**
- Erosion Control
- N34-120** *How will the Army specifically minimize erosion and runoff during the construction of roads? How will erosion control be maintained for roads when they are subject to use? In Hawai'i, best management practices (BMPs) to reduce or mitigate runoff from soil disturbing activities have historically failed at protecting water resources.*
- N34-121** • Exec Sum p 40 "Significant impacts would occur at...PTA (See Section...8.9) relating to soil loss from training activities. Significant but mitigable impacts would occur at...PTA (See Section...8.9) relating to soil erosion and loss from wildland fires. Significant but mitigable impacts would occur at...PTA (See Sections...8.9) from soil compaction, and slope failure. Project-wide impacts would be significant from soil loss, and significant but mitigable from wildland fire-related soil loss, soil compaction, soil contamination, and slope failure...Less than significant impacts from exposure to soil contaminants are expected at ...PTA." [bold added]
The long and short-term impacts of soil loss, erosion, contamination, and runoff must be detailed. How much soil will be lost, contaminated, or compacted? How will the military be able to return the land in the same condition they received it if the soil has been eroded away or contaminated?
- N34-122** • Chapter 4 p 48 "The Proposed Action could result in a significant long-term impact on surface water quality from suspended sediment at SBMR and PTA. Surface water quality may be affected by soil erosion, which can result in transport of sediment to streams and an increase in the turbidity of the water or in increased rates of sediment deposition in stream channels. These effects are probably occurring under existing conditions, and ATTACC [Army Training and Testing Area Carrying Capacity] results suggest that soil erosion would increase at SBMR and PTA. ..It is unlikely to affect surface water quality at PTA due to lack of perennial streams there." [bold added]

N34-92

As discussed in Section 8.11, the Army proposes to restrict and protect training activities at the Ke'amuku Village.

N34-93

The sacredness of both Mauna Kea and Mauna Loa have been addressed in revisions to the EIS. Cultural resource sections have been updated in the Final EIS. The overall impact to cultural resources on a project wide basis is significant. The Programmatic Agreement and other measures will reduce the severity of the impact but not always to a less than significant level.

N34-94

Based on public comment, the cultural resource sections have been expanded and updated. Where cultural site cannot be avoided, the determination has been changed to significant. The Final PA as signed by the Army, SHPO, ACHP and concurring parties is included in Appendix J of the Final EIS. As shown in Table ES-23, the cultural resource visitors center is not proposed as likely mitigation. There is a cultural resource education center proposed under the PTA Master Plan NHPA Section 106 consultation. The Army has identified more feasible mitigation measures to reduce the impact to cultural resources as discussed in Table ES-22 and Section 8.11.

N34-95

The discussions in Section 8.11 have been expanded to better discuss the effects on cultural resources at PTA. The Army has determined that the impact to cultural resources including historic buildings is significant. The Army will implement mitigation measures such as the Final PA as signed by the Army, SHPO, ACHP and concurring parties (Appendix J of the Final EIS). The PA described the process for site specific compliance actions with avoidance to the full extent practicable as the first measure. A separate NHPA Section 106 consultation is being developed for the PTA cantonment area in association with the PTA Master Plan.

N34-96

The discussions in Section 8.11 have been expanded to better discuss the effects on cultural resources at PTA. The Army has determined that the impact to cultural resources including historic buildings is significant. The Army will implement mitigation measures such as the Final PA as signed by the Army, SHPO, ACHP and concurring parties (Appendix J of the Final

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N34-122 cont'd The two sections in bold appear to contradict each other. Will surface water be affected? What surface water, exactly, and what will be the significant impacts?

- Chapter 4 p 53 "ATTACC modeling results suggest that...soil erosion may be significantly increased by training activities under the Proposed Action at SBMR and PTA, due to increased intensity of use within limited maneuver areas. Also, the amount of land subject to increased soil erosion would increase at SBMR and PTA...The ATTACC modeling results indicate that increased training intensity would severely degrade the condition of the land...due to the degree of severity of the impact indicated by the ATTACC modeling, and because the ability to fallow damaged land may be limited by lack of sufficient mounted maneuverable land area, soil loss at...PTA may be only partially mitigable. Also, soil loss would increase significantly in spite of land management measures under the ITAM program."
Chapter 4 p 54-55 "Soils in training areas, and especially in areas that have not previously been used for maneuver training, such as...portions of the WPAA, [West PTA Acquisition Area] are likely to become compacted by use of tracked or wheeled vehicles, potentially affecting their ability to support vegetation and altering their permeability and moisture retention capacity. Widespread compaction could generally reduce recovery of vegetation cover. Preferred drainage pathways could develop along the compacted linear track left by off-road vehicles, creating increased erosion along the tracks. The impacts of these changes are considered to be significant depending on the amount of land area affected. ATTACC modeling results suggest that a large proportion of the land area in the maneuver areas could be affected...The ITAM [Integrated Training Area Management] Program would be used... to identify land management measures that might reduce the impact. The impacts could be partially or fully mitigable by requiring motorists to avoid affected off-road areas if impacts are observed and be revegetating and recontouring affected areas." [bold added]

"Might" and "could" are not mitigation. Waiting till impacts are observed is too late. Wouldn't recontouring add to soil compaction problem?

N34-124 Chapter 6 p 106 [re tank trail] "During construction, erosion by both wind and water could occur...this impact is considered potentially significant. After construction, the road could affect surface drainage...Large runoff events could result in soil accumulation in culverts at gulch crossings, resulting in flooding and possible washouts of the roadway...Soil erosion may be reduced or prevented by implementation of standard construction practices."

Will soil erosion be prevented by implementation of best management practices?

N34-125 Chapter 10 p 1 "NEPA [National Environmental Protection Act] requires additional evaluation of the project's impact with regard to...Any irreversible or irretrievable commitment of resources."

Eroded, washed-away land is an irreversible, irretrievable commitment of resources. The EIS fails to address this impact.

DUST AND AIR QUALITY

EIS). The PA described the process for site specific compliance actions with avoidance to the full extent practicable as the first measure. A separate NHPA Section 106 consultation is being developed for the PTA cantonment area in association with the PTA Master Plan.

N34-97

The Final PA as signed by the Army, SHPO, ACHP and concurring parties is included in Appendix J of the Final EIS. The Final PA has had minor changes from the version made available to the public in October 2003 with the Draft EIS. The Final PA in the version that has been signed has been available to the public via the SBCT website since January 2004.

N34-98

Each specific site was surveyed and no artifacts or surface features were found indicating the presence of cultural resources. However, once construction begins these sites will be bound by the conditions described in the PA to protect any resources discovered at that time.

N34-99

The Final PA as signed by the Army, SHPO, ACHP and concurring parties is included in Appendix J of the Final EIS.

N34-100

Chapter 10 has been expanded to better discuss the potential impacts to environmental justice issues included Areas of Traditional Importance. Mitigation measures including the implementation of the Final PA are discussed. As part of the mitigation, the Army will consult with Native Hawaiian organizations on potential impacts to ATIs.

N34-101

Noise impact discussions regarding training activities at WPAA have been expanded in the Final EIS. Smoke devices used as obscurants or to simulate biological, chemical, or nuclear exposure conditions have minimal noise impacts. Grenade and artillery simulators would have localized noise impacts, but the frequency of their use has not been determined. Noise impacts from these devices could be minimized by maintaining adequate separation from noise-sensitive land uses or by limiting their use during nighttime hours. 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

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- Munitions

N34-126

As there is no air quality monitoring station in SBMR, we wonder how air pollution in the area can be monitored and a baseline established? While increasing ordnance use quantities by 25 percent seems significant, in section 5.5.2 it is stated, "Because emission quantities from ordnance use are very small and include only trace quantities of hazardous components they pose very little risk of creating adverse air quality impacts." As there are significant amounts of ordnance explosions during training, it would seem possible that trace quantities of hazardous components can add up to pose a risk of hazardous air quality. Have there been studies done to determine localized air quality impacts of ordnance explosions? Based on evidence in research that air quality has a direct impact to soil and water quality, have there been studies done to determine soil and water quality before and after ordnance use? How can you determine that no significant air quality impacts would occur, based upon the lack of an air quality monitoring station in the area?

N34-127

Has the Army tested the transport of vaporized lead and beryllium through the air from munitions explosions?

- Stryker vehicle emissions

N34-128

What is the rate of emissions for criteria pollutants from a Stryker vehicle? How does that compare to the average emissions of cars and trucks? Please include a figure to show the average rate of emissions from military vehicles, including Stryker vehicles. How will these Stryker vehicle emissions affect the sensitivity of the small-lunged avian fauna? What air quality impacts will these emissions have on the endangered O'ahu Elepaio forest bird and the insects upon which it depends for food? What impacts upon Elepaio territory selection and nesting success might Stryker air emissions have?

- Dust control

N34-129

What impacts do synthetic dust control chemicals have on soil and water quality? If these chemicals wash into streams or ocean, how will they affect aquatic organisms?

N34-130

Which species will be used in vegetation reseeding programs to reduce the fugitive dust generation? We would like to see native species used to the greatest extent possible in order to reduce the facilitation of weed dispersal.

N34-131

Please calculate the estimated water quantities necessary to reduce fugitive dust generation by 70 – 90 percent throughout SBMR per month. Please specify where you would obtain this water, and what effects this would have on your water source. Please determine which method, water application or synthetic dust control chemicals, would have less detrimental effects on the adjacent environment, specifically air, soil and water quality.

N34-132

- Chapter 4 p 21 "Net increases in fugitive dust from vehicle use would be...420 tons...per year at PTA."

What are the short and long-term impacts to the ecosystem and human health from increasing the amount of fugitive dust at PTA?

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than significant level. The Army acknowledges that local residents may not agree with the criteria the Army uses to determine acceptable noise levels.

N34-102

Noise impact discussions regarding training activities at WPAA have been expanded in the Final EIS. Smoke devices used as obscurants or to simulate biological, chemical, or nuclear exposure conditions have minimal noise impacts. Grenade and artillery simulators would have localized noise impacts, but the frequency of their use has not been determined. Noise impacts from these devices could be minimized by maintaining adequate separation from noise-sensitive land uses or by limiting their use during nighttime hours. 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.

N34-103

Low altitude helicopter flights are a routine component of training exercises at PTA. The Proposed Action would extend low altitude helicopter flight activity into WPAA. Section 8.6 in the Final EIS has reanalyzed noise contours based on this change, finding only minimal changes to the noise contours at both PTA and SBMR. For the aviation training, there are no changes proposed in the number of aircraft from what already exists at the US Army Hawai'i's Aviation Brigade. The only change that would occur is a slight increase in aviation training over the proposed West PTA Acquisition Area, as the Aviation Brigade would train along with the SBCT brigade during different training maneuvers. The analysis in the FEIS reflects this change in aviation training over West PTA. 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.

N34-104

As discussed in Section 3.6, the ENMP program is an on-going Army planning program that is not directly related to the proposed action. As such, the ENMP is not a required element of the EIS process. The EIS incorporates available information from the ENMP, and supplements that information with additional noise analyses related to vehicle noise, helicopter and aircraft noise,

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N34-133

- Chapter 4 p 22 "Providing a gravel cover...will reduce fugitive dust...Gravel produced by crushing local lava-derived rocks would have moderate dust content unless thoroughly washed. In addition, lava-derived gravel...is likely to fragment and crumble...the resulting gravel surface would be expected to generate noticeable quantities of fugitive dust. Gravel treatments by themselves are unlikely to reduce dust generation to less than significant levels."

What will the source of the water be to "thoroughly wash" the gravel cover?

N34-134

- Chapter 8 p 29 "Projects...would not affect natural resources management areas."

How will running tanks and paving parts of the 23,000 acres, with the associated noise, dust, and pollution not affect the natural resources management areas?

N34-135

- Chapter 8 p 51 "PM10 [inhalable particulate matter] emissions...are easily airborne and are small enough to be inhaled deep into the lungs creating potential adverse health effects. The 429 tons per year...increase in fugitive PM10 emissions generated by military vehicle [sic] at PTA, the likelihood of exceeding the federal 24-hour standard, and the potential impacts to quality of life to Waiki'i Ranch residents and users of Kilohana Girl Scout Camp combined may result in a significant air quality impact...it is unlikely that...dust control programs would be effective enough to reduce the net increase to a less than significant level."

What will be the long and short-term impacts of increased inhalable particulate matter be on the health of the children at the Kilohana Girl Scout camp?

MISCELLANEOUS

N34-136

- Executive Summary p. 34: "Beneficial impacts would be realized at the WPAA from the expansion of public access for hunting during periods when no military training is taking place."

The EIS should state whether Waiki'i Ranch homeowners and users of Kilohana Girl Scout Camp consider more shooting nearby to be beneficial.

N34-137

- Chapter 2 p 41 "UAVs...individual use and frequency has yet to be determined..."
- Chapter 8 p 46 Unmanned aerial vehicles are planned.

The EIS must state the number of UAVs, where they will fly, how often they will be used, and address noise and safety issues.

N34-138

- Chapter 3 p 19 Table 3-4 currently military use of Hilo airport is 10% and Kona airport 13%.

The EIS should specify how this would change.

- Chapter 4.13: Socioeconomics and Environmental Justice

and small arms firing noise. Mitigation measures to reduce the impact from noise are identified in Sections 4.6, 5.6 and 8.6.

N34-105

The discussion of noise from vehicle traffic on the PTA Trail has been expanded in the Final EIS. The closest point on the PTA Trail to is 1.25 miles from Waiki'i Ranch, and 1.8 miles from Kilohana Girl Scout Camp. Hourly average noise levels from normal convoy traffic on PTA Trail would be about 37 dBA at Waiki'i Ranch and about 31 dBA at Kilohana Girl Scout Camp. These noise levels are comparable to or less than normal daytime background noise levels. Consequently, vehicle traffic on the PTA Trail would not cause significant noise impacts to either Waiki'i Ranch or Kilohana Girl Scout Camp. Diversion of a significant portion of military vehicle traffic onto the PTA Trail would clearly reduce vehicle noise impacts at the Kilohana Girl Scout Camp because the PTA Trail is much further from the camp than is Saddle Road. The diversion of military vehicle traffic to PTA Trail also would reduce vehicle noise impacts for most of Waiki'i Ranch. Although the southwest corner of Waiki'i Ranch would be slightly close to PTA Trail than it is to Saddle Road, noise levels from PTA Trail would be equivalent to or less than normal daytime background noise conditions throughout the Waiki'i Ranch property. Individual vehicles on PTA Trail may produce peak pass by noise levels that would be audible at Waiki'i Ranch, but those noise levels would not differ much from current conditions with military vehicle traffic on Saddle Road.

N34-106

As discussed in Section 4.6, the Army proposes to evaluate training activities and timing of training actions to reduce noise levels as mitigation for noise impacts. In addition, the Army proposes a 1,000 foot daytime noise buffer and a 2,000 foot nighttime noise buffer at WPAA for training activities.

N34-107

These impacts are discussed in the Biological Resources section, 5.10.

N34-108

Impacts from noise and locations of sensitive species are discussed in the Biological Resources section, 5.10.

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N34-139

This section should consider the impact of decreased property values in the Waikī/ Waikoloa/ Waimea area and the cost to taxpayers for cleanup when PTA closes.

- Chapter 4 p 7 A proposed mitigation is "Establishing a citizens' advisory board for O'ahu and Hawai'i USARHAW training lands..."

N34-140

This is not a viable mitigation, given the Army's track record on boards. The Sierra Club, Moku Loa Group requested a citizen advisory board for Pohakuloa Training Area in December 2002. The Army proposed utilizing the Hawaii Land Use Council for this purpose in March 2003 and said the Army would contact Sierra Club about the agenda and schedule. As of December 2003, no contact had been made. Gerald DeMello, Big Island representative to the Land Board; Chris Yuen, director of the Hawaii County Planning Department; and Sierra Club Moku Loa group have never heard of the Council. Major General Olson has not replied to a June 2003 inquiry.

- Chapter 10 p1 "NEPA requires additional evaluation of the project's impact with regard to...Any irreversible or irretrievable commitment of resources."

N34-141

The Army Corps of Engineers says it will take "centuries" to clean ordnance from the over fifty former military sites on Hawaii Island. When and if the military stops using PTA and the 23,000 acres, cleanup may take "centuries" also. So military use of this land is effectively "irreversible" and "irretrievable." The impact of committing the 50-plus old sites, PTA, and the 23,000 acres to military use... followed by probable centuries of ordnance hazard to the public and possible contamination from deteriorating old ordnance... must be evaluated.

CUMULATIVE IMPACTS AND SEGMENTATION CONCERNS

Consider the following piecemeal planning approach at PTA:

- (1) From January 1990 to March 1998 a Social, Economic, and Environmental Team held meetings to discuss the Saddle Road.*
- (2) From June 1993 to July 1999 the Saddle Road Community Task Force met.*
- (3) In March 1994 a Notice of Intent for the Saddle Road realignment was published.*
- (4) In January 1997 the Army identified "a requirement for 98,840 acres of contiguous maneuverable land...The largest single usable parcel is the 19,148 acres at Pohakuloa Training Area. This equates to a deficiency of 79,692 acres..." [January 1997 Army Land Use Requirements Study (LURS) quoted in the March 2002 Environmental Assessment for Land Acquisition at Pohakuloa Training Area for purchase of 1010 acres]*
- (5) In February 1997 the Army showed "a shortfall of 70,723 total acres and 46,745 contiguous acres for a single Army Training and Evaluation Program task" and recommends "Support the acquisition of 69,933 additional training acres for the 25th ID(L) & USARHAW to fulfill the ARTEP requirements." [February 7, 1997 Army memo in a Land Use Requirement Study]*
- (6) Hawaii Island is probably the only island where the Army could find 46,745 to*

N34-142

N34-109

As discussed in Section 5.6, no school or child care facilities are located within the Zone III contour. As discussed in the EIS, two on-post schools (Solomon Elementary School and Hale Kula Elementary School) are within the Zone II noise contour, although Hale Kula Elementary School would be outside the Zone II contour if the nighttime noise penalty factor in the Ldn calculation is ignored. The Army proposes as mitigation for noise impacts at SBMR to evaluate training activities and timing to reduce the nighttime noise levels

N34-110

The text on page 5-82 of the DEIS has been revised; the 52% increase in vehicles applies only to the 2nd Brigade, not SBMR as a whole. Because the EIS is only addressing actions related to the transformation of the 2nd Brigade, the total vehicle fleet for SBMR has not been inventoried. The SBCT process would result in the 2nd Brigade having 1,005 vehicles, while the 3rd Brigade would retain the current inventory of 659 vehicles. There are 10 other commands located at SBMR, plus the Public Works Department. Most commands have their own vehicle fleets. With transformation of the 2nd Brigade, the total military vehicle fleet at SBMR would undoubtedly exceed 2,000 vehicles. Stryker vehicles would account for no more than 12% – 15% of the military vehicles based at SBMR.

N34-111

Locations of sensitive species and potential impacts are discussed in section 5.10.

N34-112

As noted in the Airspace discussion (Section 8.4), there are no defined enroute flight corridors to BAAF.

Flights by C-17 or C-130 aircraft would be too infrequent to yield noise contours from standard airfield noise models. Section 8.6 of the Final EIS and the figures therein illustrate.

N34-113

Neither the Army nor the Marine Corps use tanks at any USARHAW installations. The noise analysis in Section 8.6 evaluates the potential noise impacts from Strykers and other military vehicles under "noise from military vehicle use". The Army has determined that the noise impact from military vehicle use would be less than significant.

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cont'd

79,692 contiguous acres.

(7) In August 1999 the Final Environmental Impact Statement for Saddle Road came out.

(8) In March 2002 an Environmental Assessment was done to expand Pohakuloa by 1010 acres.

(9) In 2002-2003 the Army is proposing the largest Army construction project in Hawaii since WWII, including taking 23,000 more acres of Hawaii Island.

These past, present, and future land use plans should all come under one EIS that addresses the cumulative impact of all projects, not separate EISs.

N34-143

- Executive Summary p 47 Cumulative Impacts section
- Executive Summary p 48 "Construction projects...could result in significant cumulative impacts on cultural resources...there are cultural and archeological resources at Kawaihae Harbor, including an underwater heiau; the harbor deepening and the new highway from Waimea to Kawaihae Harbor could significantly affect these resources. Construction of the new range control building at PTA could have significant impacts on cultural resources, depending on its location."
- Chapter 9: Cumulative Impacts

The EIS must consider in detail the cumulative impact of past, present, and future military use of land.

The EIS must consider the cumulative impact to humans and the environment from unexploded and deteriorating ordnance and other hazards on numerous current and former military sites in Hawaii. The Formerly Used Defense Site website indicates that most of the old sites contain hazards. The Army Corps of Engineers says none of the sites are completely cleaned up, and at current funding levels it will take "centuries" to clean up all the old sites. [e-mail 10-16-03 from Joseph Bonfiglio, PAO at ACE]

MISSING PIECES

N34-144

- Chapter 8 p 45 airspace impacts "are addressed in sections 9.2, 9.10, and 9.11..."

They are not mentioned in Section 9.2. Sections 9.10 and 9.11 don't exist.

N34-145

- Chapter 8 p 46 "The potential for indirect impacts on the noise environment are addressed in Section 9.6."

Section 9.6 doesn't exist.

N34-114

As discussed in Section 3.6, the ENMP program is an on-going Army planning program that is not directly related to the proposed action. As such, the ENMP is not a required element of the EIS process. The EIS incorporates available information from the ENMP, and supplements that information with additional noise analyses related to vehicle noise, helicopter and aircraft noise, and small arms firing noise. Mitigation measures to reduce the impact from noise are identified in Sections 4.6, 5.6 and 8.6.

N34-115

Noise impact discussions regarding training activities at WPAA have been expanded in the Final EIS. Smoke devices used as obscurants or to simulate biological, chemical, or nuclear exposure conditions have minimal noise impacts. Grenade and artillery simulators would have localized noise impacts, but the frequency of their use has not been determined. Noise impacts from these devices could be minimized by maintaining adequate separation from noise-sensitive land uses or by limiting their use during nighttime hours. 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.

N34-116

Noise impact discussions regarding training activities at WPAA have been expanded in the Final EIS. Smoke devices used as obscurants or to simulate biological, chemical, or nuclear exposure conditions have minimal noise impacts. Grenade and artillery simulators would have localized noise impacts, but the frequency of their use has not been determined. Noise impacts from these devices could be minimized by maintaining adequate separation from noise-sensitive land uses or by limiting their use during nighttime hours. 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.

N34-117

As noted in the Airspace discussion (Section 8.4), there are no defined enroute flight corridors to BAAF.

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N34-118

Please see Section 8.6 for a discussion of noise levels and mitigation measures that have been developed in consideration of Waiki'i Ranch and Kilohana Girl Scout camp. Please refer to Figure 8-14 for a depiction of noise level contours of the proposed action in the PTA. Presently, both Waiki'i Ranch and Kilohana Girl Scout camp lie outside of the proposed action noise level contours. Due to potential aircraft activities that may take place in the West PTA Acquisition Area, aircraft noise contours are currently being mapped, and Waiki'i Ranch and Kilohana Girl Scout camp may potentially fall within these contours. However, no live-fire activity will take place in this region. Further modeling of dust in the PTA and WPAA areas indicate the PM10 guidelines set forth by EPA will not be exceeded. The FEIS will include this information. No impacts on health and safety of children are anticipated.

N34-119

As discussed in Section 8.6, impacts to noise from the Proposed Action at PTA are significant but mitigable to less than significant. Current noise levels are in compliance with the Army standards. If the Army decides to implement the Proposed Action, the Army proposes to mitigate noise levels at WPAA with a 1,000 foot daytime noise buffer and a 2,000 foot nighttime noise buffer on training activities.

N34-120

Among the BMPs that may be implemented for road construction would be scheduling construction to avoid wet periods; constructing drainage controls to divert runoff and runoff away from disturbed areas; designing drainage ditches to slow the rate of runoff, properly size culverts and ditches, and avoid concentrating runoff. Roads tend to act either as barriers or as conduits for runoff. Drainage for roads will be designed to maintain flows across or under the roads so that the roads do not act as barriers or conduits. The integrity of the roads and drainage across the roads would be maintained by the Army. A list of specific minimum BMPs that would be implemented have been added to the discussion of mitigation measures in Section 7.8 (Water Resources at KTA). The same, or similar measures would be applied elsewhere.

N34-121

The Army has determined that there would be a significant impact to soil loss from training activities. As summarized in Section 4.9, the Army proposes mitigation that will substantially reduce the severity of the impact but not to

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less than significant levels. In addition, the Army discusses in Section 10.5 that if the Proposed Action were implemented there would be an irreversible loss of soils at WPAA from training activities.

N34-122

The impacts to surface water quality and soil erosion have been expanded to clarify the relationship of the two and associated impacts. There is a potential for erosion to impact surface water without effective mitigation measures. The Army will implement several mitigation measures to control erosion so that soil erosion will not have a significant effect on water quality. See sections 4.8, and 4.9 for a summary of the impacts and mitigation measures for water and soil and sections 5.8,6.8, 7.8, 8,8, 5.9, 6.9, 7.9, and 8.9 for impacts at specific installations.

N34-123

The ITAM program is an interactive, dynamic, adaptive approach to management of land resources. The Army has determined that with mitigation such as ITAM, impacts will still occur but the impacts from soil loss from training activities would be significant and impacts from soil compaction would be less than significant. Soil compaction, such as in vehicle tire tracks, can create preferential pathways for runoff and can affect regrowth of vegetation. The use of heavy equipment to alter slopes would also compact soils, but the slopes may be revegetated manually. The surface would be protected from erosion while the vegetation was becoming established. Recontouring might be used locally as a means of redirecting or slowing runoff, and to re-establish a desired slope. The Army will also develop and implement a Dust and Soils Management and Monitoring Plan (DuSMMoP) for the training area. The plan will address measures such as, but not limited to, restrictions on the timing or type of training during high risk conditions, vegetation monitoring, soil monitoring, and buffer zones to minimize dust emissions in populated areas. The plan will determine how training will occur in order to keep fugitive dust emissions below CAA standards for PM10 and soil erosion and compaction to a minimum. The Army will monitor the impacts of training activities to ensure that emissions stay within the acceptable ranges as predicted and environmental problems do not result from excessive soil erosion or compaction. The plan will also define contingency measures to mitigate the impacts of training activities which exceed the acceptable ranges for dust emissions or soil compaction.

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N34-124

The standard construction practices referred to in the text are best management practices that are in common use in the construction industry to address erosion problems. While these practices will not prevent soil erosion, their implementation may substantially reduce such effects as related to construction. The incorporation of engineering controls related to storm water drainage will help to direct runoff away from disturbed soil areas, and to contain, disperse, or re-direct runoff. Mitigation measures are discussed in section 8.9.

N34-125

NEPA requires that a Federal EIS include a discussion of irreversible and irretrievable commitments of resources that would be involved in the proposed action if it is implemented (40 CFR 1502.16). This refers primarily to energy requirements and conservation potential of the proposed action and alternatives. An EIS should present the energy and material uses that would result from construction and operation of a proposed action and alternatives. Chapter 10 discusses impacts on renewable and nonrenewable energy and material resources and is considered adequate. Impacts on land resources are extensively discussed in Chapters 4-9 of the main text. The vehicles referenced have the capability to identify various reagents, but do not contain these agents. Their environmental impacts are virtually identical to similar vehicle that have been on island for several years.

N34-126

The discussion of fugitive dust issues has been expanded in the Final EIS to include results of dispersion modeling to estimate PM10 concentrations from vehicle activity on unpaved roads and in off-road maneuver areas. The Army has committed to mitigating dust from vehicle traffic on unpaved roads through a combination of dust control chemical applications and/or 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. The Final EIS concludes that the potentially significant impacts from fugitive dust can be mitigated to a level that is less than significant. The Army Environmental Center and CHPPM have on-going

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programs to determine emission rates from munitions use during military training and to use dispersion modeling studies to evaluate the potential for air quality impacts at locations near military training facilities. Health risk assessments completed to date show no significant health risks for either short term or long term exposure to emissions from weapons firing points for hypothetical residential locations within a few hundred meters (600 to 1,200 feet) of the firing point. Firing points at USARHAW installations are much further from off-post residential locations than the distances assumed in the health risk assessment studies.

N34-127

The Army has not done any air sampling at SBMR or PTA. Ordnance firing and detonation are not expected to be a significant source of metal fumes. Projectiles can be fragmented when they impact the ground, and metal coverings of high explosive warheads are fragmented by detonation processes. Metals are not vaporized by these processes. Friction between projectiles and the gun tube or barrel generate small particles of metals, but would not generate metal fumes. The only metal fumes that would form in the detonation processes would be from metals contained in the chemical composition of the energetic material itself (propellants, explosives, and pyrotechnics). Shell propellants and explosive materials have very low metal contents. Flares and smoke devices are the items most likely to produce metal fumes. Smoke devices can include various metal salts that color the smoke generated by the device, and the pyrotechnic material in flares various metal compounds. Flares can vaporize a small portion of the aluminum in the flare casing, in addition to the metals that are incorporated into the pyrotechnic material itself. Flares and smoke devices are only a small component of the ordnance items used at USARHAW ranges. Lead is not a significant component of pyrotechnic materials. Available information indicates that the beryllium concentrations found in soil samples at SBMR and PTA are almost certainly dominated by beryllium of natural origin, not the result of munitions use. Beryllium is a trace component of only a small number of munitions items, being present either as part of the alloys used in metal parts or as a trace component of various rocket propellants and a few other energetic materials. Rocket propellants would be expected to be the primary source of beryllium releases at USARHAW installations, but beryllium has not been found in all types of rocket propellants. The quantities of beryllium found in munitions items is much too small to account for the beryllium content of soils sampled

Comments**Responses**

at SBMR or PTA. The beryllium levels found in SBMR and PTA soil samples are all within the range of published data on the natural beryllium content of soils from around the world (Helmke 2000).

N34-128

No data are available specifically for the Stryker vehicle. But since the diesel engine in the Stryker vehicle is not of an unusual design, emissions can be expected to be similar to those from any conventional 350 horsepower diesel engine used in off-road heavy equipment. Consequently, EPA's diesel engine emission rates for non-highway engines were used for the EIS analyses. Emission estimates for all military vehicle traffic by the 2nd Brigade are presented in Appendix G-3 of the Final EIS, and are discussed briefly in the air quality sections of the Final EIS chapters for each installation.

N34-129

The recommended dust control chemicals (calcium chloride and/or magnesium chloride) are considered virtually nontoxic. These compounds are applied directly to the surface being treated, so there should be no direct exposure of adjacent areas. Given normal use procedures and quantities, hygroscopic salt solutions pose no significant risk to soils or aquatic ecosystems. The Air Quality and Water Resources sections (Sections 4.5, 4.8, 5.5, 5.8, 6.5, 6.8, 7.5, 7.8, 8.5, 8.8) have been expanded to discuss proposed dust palliative treatments and potential impacts or considerations for their use. If the Army decides to implement the Proposed Action, the Army proposes to use "environmentally friendly" dust control measures that would have less than significant impacts on water resources.

N34-130

The feasibility of any revegetation program would be determined in the context of the Army's established INRMP 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.

N34-131

As indicated in the DEIS, use of water for dust control on unpaved roads is not recommended due to the very large quantities required. Synthetic dust control chemicals are considered the only feasible treatment for unpaved roads

Comments

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at USARHAW installations. The discussion of dust control chemicals has been expanded in the Final EIS. The frequency of dust control chemical applications would be determined by actual experience and monitoring changes in dust generation in response to changing weather conditions. Until the required frequency of application has been determined, it is not practical to estimate annual water use quantities required for mixing the dust suppressant solutions. The Air Quality and Water Resources sections (Sections 4.5, 4.8, 5.5, 5.8, 6.5, 6.8, 7.5, 7.8, 8.5, 8.8) have been expanded to discuss proposed dust palliative treatments and potential impacts or considerations for their use. If the Army decides to implement the Proposed Action, the Army proposes to use "environmentally friendly" dust control measures that would have less than significant impacts on water resources.

N34-132

The Army has committed to mitigating dust from vehicle traffic on unpaved roads through a combination of dust control chemical applications and/or the use of washed gravel for surfacing military vehicle trails. In addition, the Army will develop and implement a Dust and Soils Management and Monitoring Plan (DuSMMoP) for the training area. The plan will address measures such as, but not limited to, restrictions on the timing or type of training during high risk conditions, vegetation monitoring, soil monitoring, and buffer zones to minimize dust emissions in populated areas. The plan will determine how training will occur in order to keep fugitive dust emissions below CAA standards for PM10 and soil erosion and compaction to a minimum. The Army will monitor the impacts of training activities to ensure that emissions stay within the acceptable ranges as predicted and environmental problems do not result from excessive soil erosion or compaction. The plan will also define contingency measures to mitigate the impacts of training activities which exceed the acceptable ranges for dust emissions or soil compaction. The Final EIS concludes that the potentially significant impacts from fugitive dust can be mitigated to a level that is less than significant.

N34-133

Any available water supply (including sea water) could be used for gravel washing purposes, and the wash water could be recycled for washing multiple batches of gravel.

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N34-134

As discussed in Section 8.2, impacts to land use will not be significant. The discussions in Section 8.10 have been expanded to better address potential impacts from the Proposed Action on biological resources. In some cases, the determination has been changed.

N34-135

The discussion of fugitive dust issues has been expanded in the Final EIS to include results of dispersion modeling to estimate PM10 concentrations from vehicle activity on unpaved roads and in off-road maneuver areas. The Army has committed to mitigating dust from vehicle traffic on unpaved roads through a combination of dust control chemical applications and/or 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 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. The Final EIS concludes that the potentially significant impacts from fugitive dust can be mitigated to a level that is less than significant.

N34-136

Noise impact discussions regarding training activities at WPAA have been expanded in the Final EIS. Smoke devices used as obscurants or to simulate biological, chemical, or nuclear exposure conditions have minimal noise impacts. Grenade and artillery simulators would have localized noise impacts, but the frequency of their use has not been determined. Noise impacts from these devices could be minimized by maintaining adequate separation from noise-sensitive land uses or by limiting their use during nighttime hours. 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.

N34-137

Impacts on safety, noise, and emissions are addressed in the EIS in all Chapters 4 - 8 in sub sections 4 for airspace, 6 for noise, 5 for air quality, and 12 for human health and safety. As noted on page 2-39 of the DEIS, the

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Proposed Action would equip the 2nd Brigade with 4 UAVs, each of which would be flown for about 600 hours per year. There would be an average of 600 total sorties per year. Thus, typical sorties would last about 4 hours each. As noted in the Airspace sections of the various installation chapters for the DEIS, most UAV flights would be conducted within existing restricted airspace areas. Any flight activity outside of restricted airspace areas would require compliance with FAA regulations and procedures. Consequently, UAV flight activity would not create any significant safety issues. And as noted in the noise impact sections of the DEIS, UAV flight activity would not create any significant noise impacts.

N34-138

Chapter 2 identifies no proposed use of either Hilo or Kona airports.

N34-139

Future property values are based on several factors that fall outside of the purview of the Army action. It would be speculative in nature for the Army to assume either positive or negative impacts to adjacent property values. If the Army decides to implement the proposed action, the Army will implement mitigation measures to help keep the proposed action to less than significant impact levels where practicable.

N34-140

Mitigation measures likely to occur are outlined in the Executive Summary. These proposed mitigation measures were included for public comment. The Army reviewed the measures based on public comments and the benefits of each measure to reduce impacts. The Army has listed those mitigation measures that are high priority and those that are unlikely to occur because of limited resource, unfeasible or there are similar measures already in place. The ROD will indicate which mitigation measures will be implemented.

N34-141

NEPA requires that a Federal EIS include a discussion of irreversible and irretrievable commitments of resources that would be involved in the proposed action if it is implemented (40 CFR 1502.16). This refers primarily to energy requirements and conservation potential of the proposed action and alternatives. An EIS should present the energy and material uses that would result from construction and operation of a proposed action and alternatives. Chapter 10 discusses impacts on renewable and nonrenewable energy and

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material resources and is considered adequate. Impacts on land resources are extensively discussed in Chapters 4-9 of the main text.

N34-142

Table 9-2 and the cumulative impact analysis in Chapter 9 addresses the two land acquisitions, Saddle Road and the trends mentioned in the comments. The EIS considers the Saddle Road realignment project and takes into account the Saddle Road EIS. The EIS also takes into account the Pu'u KeeKee acquisition, as well future acquisition projects in the PTA area. The EIS, while not critiquing the adequacy of the planning efforts, assesses the impacts of the projects and trends mentioned in the comment. Chapter 9 has been updated, based on comments and any project changes since the DEIS.

N34-143

Based on public comment, Chapter 9 - Cumulative impacts has been expanded. The cumulative impact analysis in Chapter 9 assesses in detail the impacts on cultural resources, unexploded ordinance and other hazardous materials. Sections 4.12, 5.12, 6.12, 7.12, 8.12 include in depth discussions regarding unexploded ordinance. Chapter 9 also includes a discussion of the historical trends for each resource area, including information on trends for both military and non-military land use in Hawai'i.

N34-144

The reference has been changed to Section 9.5.2 – Cumulative Impacts by Resource under the paragraphs for Airspace.

N34-145

Last line in next to last paragraph on page 8-46 (Airspace) has been revised to say Section 8.6 rather than Section 9.6.

Comments

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May 2004

Stryker Brigade Combat Team Final EIS, Hawai'i

P-326

Letter N35	<p>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, HI 96858-5440</p> <p>Dear Ms. Barger,</p> <p>We request that you extend the hearing dates and comment deadline to at least 90 days after release of the draft Environmental Impact Statement on Army transformation.</p> <p>Army NEPA regulations stress the importance of public involvement (e.g., 32 C.F.R. 651.47) and there are problems in this area.</p>
	<p>1-The proposed transformation is the largest Army construction project in Hawaii since World War II. We have heard that the EIS may run to 1500 pages. The legally required 15 days (between EIS release and hearings) is completely inadequate for groups to explore the ramifications of the proposed action and prepare a response.</p>
N35-1	<p>2-Construction and research money for the plan is already in the military budget, although the draft EIS will not come out till about October 1.</p>
N35-2	<p>3-Before the scoping meetings, the Army failed to provide the public with necessary information, to the point that Earthjustice asked that the scoping comment period be extended.</p>
N35-3	<p>4-In September 2002 the Army abruptly cancelled a tour of Pohakuloa requested by about 15 community people concerned about the Army transformation plans. The Army said some of the people were unacceptable, but refused to say who.</p>
N35-4	<p>5-The Army is excluding the public from meetings about the expansion.</p>
N35-5	<p>Major General Olson has not replied to a June 2003 inquiry.</p> <p>On May 16, 2002 the Army invited selected business and government people to a meeting and dinner in Hilo. Concerned citizens picketed outside, then entered the meeting and said such meetings must be open to the public. But the Army again invited a selected group to a another closed meeting where the Army expansion and other land use issues were discussed, on July 16, 2003, in Hilo.</p>
N35-6	<p>6-Nine months have gone by with no concrete response from the Army re. a citizen advisory board for Pohakuloa Training Area.</p> <p>Sierra Club Moku Loa group requested the board in December 2002.</p> <p>The Army proposed utilizing the Hawaii Land Use Council for this purpose in March 2003 and said the Army would contact Sierra Club about the agenda and schedule. No contact has been made.</p> <p>Moku Loa Group, P.O. Box 1137, Hilo, Hawai'i 96721</p>

N35-1

The DEIS was released to the public October 3, 2003 and the first public meeting was held October 28, 2003, 25 days after the release of the DEIS.

N35-2

Although funds have been programmed for certain SBCT activities, no funds have been spent beyond planning and design measures permitted under NEPA.

N35-3

In response to public comments during the scoping period, the Army provided additional information to the public and extended the public scoping period.

N35-4

We thank you for your comments. We acknowledge the postponement of the proposed meeting scheduled for September 12, 2002. The meeting was postponed due to conflicting mission requirements. The Army contacted the Sierra Club and informed them of the postponement and procedures for rescheduling. The Army continues to welcome requests for tours of PTA as part of our overall community relations outreach program. In order to protect the safety of those on the tours and the security of Army training activities, accessible locations and tour sizes will be determined on a case by case basis. For more information, please contact the U.S. Army Hawai'i, PTA Public Affairs Office.

N35-5

The Transformation program encompasses a number of projects and operations on two islands and requires extensive planning and coordination. Over the past two years, the Army has gone to great lengths to be inclusive of both the public-at-large and the many various groups that may be directly or indirectly affected by the proposed action. Since January 2002, Transformation representatives have participated in approximately one hundred meetings to present information on the program and to discuss concerns and issues that these groups may have. Over a dozen meetings at various locations on O'ahu and Hawai'i were designed specifically for the general public to attend. The purposes of these meetings included general information dissemination, technical discussions on specific topics, discussions of issues and concerns, planning and analysis, etc. In addition, smaller

Appendix P. Comments and Responses

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7-There was no notice of the comment deadline for a draft agreement.

No notice re. the draft programmatic agreement (PA) among the 25th Infantry Division (Light), Hawaii State Historic Preservation Office, and Advisory Council on Historic Preservation was given to Earthjustice, American Friends Service Committee, or Sierra Club Moku Loa group, although all were involved in the EIS process.

N35-7

No notice was posted on the Army Transformation web page as of May 10 for the May 16, 2003 deadline.

Laurie Lucking e-mailed me that comments can still be made since the PA will be in the draft EIS.

But with a 1500-page EIS, extra comment time would have been helpful.

In light of the above, we request an extension.

Sincerely,

Cory Harden

Pohakuloa Coordinator
Sierra Club, Moku Loa Group
mh@interpac.net
Phone: 968-8965

Moku Loa Group,
P.O. Box 1137, Hilo, Hawaii 98721

Responses

meetings were held to discuss a diverse range of interests on a more focused level. Invitees and specific agendas varied depending upon the particular issues involved, but these meetings have been attended by representatives from federal, state and county agencies; the media; cultural resources, hunting, engineering, conservation and civic groups; neighboring landowners; neighborhood boards; the Boy Scouts, and other community leaders, to name a few. The 15 May 2002 meeting was held specifically for key leaders from the island of Hawai'i and the invitation list was developed for a discussion aimed at that level. This meeting followed a series of Public Scoping meetings held several weeks earlier to inform the general public and encourage their input. The 16 July 2003 meeting was a specific Land Use meeting for an array of interested parties. Attendees included representatives from the County of Hawai'i, the Economic Development Board, Hawaiian Homelands, Royal Order of Kamehameha, The Nature Conservancy, Chamber of Commerce, University of Hawai'i at Hilo, a State Representative, State Senators, and, among others, Ms Harden herself from the Sierra Club.

N35-6

The Army has made, and will continue to make, itself openly available to communicate, coordinate, and interact with various individuals and groups in various manners and forums, to include through the Hawai'i Land Use Council (renamed Land Use Meeting). Therefore, we have determined that there is no need to establish a citizen's advisory council.

N35-7

The PA was submitted for public comment in April 2003 via a notice of availability published in the newspapers (same ones as the DEIS) and in OEQC. In addition, the PA was made available during the DEIS review and comments solicited through the DEIS comment period. The Final PA as signed by the Army, SHPO, ACHP and concurring parties is included in Appendix J of the Final EIS. The public comment period was extended to 90 days and ended on January 3, 2004.

Comments

-----Original Message-----

Letter N36

From: Cory [mailto:mh@interpac.net]
Sent: Thursday, November 06, 2003 5:48 AM
To: SBCT_EIS@poh01.usace.army.mil; MEDIA NWS HIJ editor; MEDIA NWS HTH letters; dsmith@hawaiiitribune-herald.com; MEDIA NWS wht; Hawaii@honoluluadvertiser.com; MEDIA NWS Hnl Adv; letters@starbulletin.com; MEDIA NWS SB rthomps; MEDIA NWSHnlWklyeditor; gov@gov.state.hi.us; seninouye@capitol.hawaii.gov; senkokubun@capitol.hawaii.gov; repchang@capitol.hawaii.gov; rephale@capitol.hawaii.gov; senator@akaka.senate.gov; senator@inouye.senate.gov; neil.abercrombie@mail.house.gov; ed.case@mail.house.gov
Subject: comments on Pohakuloa expansion for Nov 6 hearing

COMMENTS ON ARMY TRANSFORMATION

ENVIRONMENTAL IMPACT STATEMENT

11-6-03

Cory (Martha) Harden

Pohakuloa Issue Coordinator for Sierra Club, Moku Loa Group

I applaud the Army for extending the comment deadline to January 3. This allows more time to address serious concerns about expansion.

N36-1

But on January 3, there will still be unexploded ordnance and other hazards left on the more than 50 old military sites scattered all over our island. The Army says it will take centuries to clean them up.

This is unacceptable.

Sierra Club's position is that the military should not take any new land until all the old sites are cleaned up.

Other people will say more about old sites. I'll be speaking about the EIS process.

The EIS process is flawed...

...to the point that Sierra Club asks the Army to set up a question and answer session to respond to serious concerns we have about the EIS.

First flaw: the public has been prevented from participating in the EIS process.

N36-2

People were arrested at EIS meetings in Honolulu... for carrying signs...which were allowed in previous meetings. These arrests violated their civil rights...and have chilling effect on others seeking to voice well-founded concerns about Army plans.

Responses

N36-1

We share and understand your concern on this issue. Our soldiers and their families live and work on our installations. As summarized in Section 4.12, the Army proposes mitigation measures to include UXO clearance activities prior to construction and during training activities to reduce the overall UXO accumulation and potential risk to human health and safety through the life of the project. This issue has the highest level of attention at the Department of Army and it is addressed by a centrally managed program that involves the identification, investigation, evaluation, and, if needed, remediation of potential sites. This program, called the Installation Restoration Program, is coordinated with the state and the US EPA to insure compliance with all laws and regulations. It is not, however, possible to estimate cost or time required related to a specific site until the evaluation phase has been completed. The Army is committed to cleaning up existing sites in accordance with applicable laws regulations. In addition, if the Army chooses to relinquish ownership of the land as a result of a 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 FUDS program.

N36-2

During the scoping meetings, the public facilities would not allow the meetings to extend beyond 10:00pm. This time restriction required that members of the public keep their oral comments short. After many public comments about the length of the meetings, and in an attempt to allow for full participation of all people present, the Army decided to hold the Draft EIS public meetings at private facilities where the facility was open as long as the Army needed. The majority of the Draft EIS public meetings did not conclude until after 12:00am.

At the first two meetings Honolulu Police Department arrested a total of seven people for trespass when they attempted to enter the facilities with signs. All individuals were advised that they were welcome to enter the facilities without the signs. It was not the intent of the Army to restrict the public through the format and location of the public meetings. We corrected the situation by working with the other facility locations to allow signs in the meeting rooms and provide tables for members of the public to display signs and information. In addition, we worked with the facilities and the City and County of Honolulu's prosecutor and all charges were dropped against individuals involved in the situation. All of the individuals who were arrested had the opportunity to participate in subsequent meetings and most of them attended and provided public comment.

Comments

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May 2004

Stryker Brigade Combat Team Final EIS, Hawai'i

**N36-2
cont'd**

The Army held two private expansion meetings and an unpublicized press conference in Hilo despite citizen protests about the need for open meetings.

15 or so people concerned about Army expansion plans set up a tour of Pohakuloa. The Army abruptly cancelled the tour... said some of the people were unacceptable...but refused to name these people.

I asked for a disability accommodation for this meeting and it was not provided.

N36-3

Second flaw: expansion seems to be a done deal.

Months before the draft EIS came out, the Army announced fire and emergency service would move from Kilauea Military Camp to Pohakuloa and said the decision was "directly related to the increased workload associated with PTA's Transformation Plan..."

Construction and research money for transformation was already in the military budget.

And Senator Daniel Inouye said he was assured that Hawaii would get a Stryker brigade.

N36-4

Third flaw: pieces of the EIS are missing.

A few examples:

There will be a vehicle wash, says the EIS...if utility requirements and space permit...so it's not clear whether we will have this protection against alien species.

The EIS refers to the reader to four sections that discuss airspace and noise impacts. I can't find any of those sections.

The EIS repeatedly refers to a Programmatic Agreement with the State Historical Preservation Office... says it may have been revised...and never resolves what version is being used.

N36-5

To sum it up, Army actions endanger our island.

There is danger from abuse of the environment.

There is danger from unexploded old ordnance.

And there is the danger of forgetting that in a democracy...

the people don't serve the will of the Army...

the Army serves the will of the people.

PO Box 10265 Hilo, Hawaii 96721 968-8965 mh@interpac.net

In regards to disability accommodations at the Hilo meetings, Ms. Harden had requested a well-ventilated room with no carpeting and no air conditioning due to health related issues. The Army held the meetings in a well-ventilated room and set up a live video feed of the meetings in the lanai area that was free of air conditioning and carpeting.

N36-3

Although the Department of Defense, Department of the Army, and Congressional representatives have issued statements that the 2nd Brigade, 25th ID(L) will transform to a Stryker Brigade, these statements refer to programmatic level decisions necessary to continue the planning, funding and assessment processes for the proposed transformation efforts and set the conditions for implementing an action once a final decision has been made. The final decision on whether the 2nd Brigade, 25th ID(L) will transform to an SBCT will be made by the appropriate local commander, subject to environmental assessment and other appropriate reviews and compliance with applicable federal law.

N36-4

This is a proposed mitigation measure. There will be a wash rack at PTA that should provide adequate protection; the proposed wash rack at Kawaihae is somewhat redundant and likely not feasible for logistical reasons.. Mitigation measures that will be included in the project will be identified in the FEIS and the ROD. Airspace impacts are discussed in Sections 5.4, 6.4, 7.4, 8.4, and in Chapter 9 – Cumulative Impacts. Noise impacts are discussed in Sections 5.6, 6.6, 7.6, 8.6 and in Chapter 9 – Cumulative Impacts. The final version of the PA was used in the Final EIS. The Final PA as signed by the Army, SHPO, ACHP and concurring parties is included in Appendix J of the Final EIS.

N36-5

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. Significant project impacts will be mitigated (see chapters 4-8 of the EIS). Ordnance removal on lands that are no longer under military ownership is not part of this proposed action but is handled through the Formerly Used Defense Program (FUDs). For information on FUDs projects and clean up status on the island of Hawai'i, you may contact Mr. Chuck Streck, the FUDs manager at the U.S. Army Corps of Engineers, (808) 438-6934.

Appendix P. Comments and Responses

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Comments

Responses

Letter
N37

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January 2, 2003

Ms. Cindy Barger
U.S. Army Corps of Engineers, Honolulu District
Bldg. 230, CEPOH-PP-E
Ft. Shafter, HI 96858-5440

Re: Draft Environmental Impact Statement—Transformation of the 2nd Brigade, 25th Infantry Division (L) to a Stryker Brigade Combat Team in Hawaii

Mesdames and Messieurs:

We are attorneys for Western United Life Assurance Company (“Western United”), the current owner of the real property in Mokuleia, Oahu, Hawaii, known as the “Dillingham Ranch”. On Western United’s behalf we present herewith, comments on the subject Draft Environmental Impact Statement (DEIS). While Western United is not opposed to the transformation in concept, the DEIS contains two significant deficiencies in evaluating the impact of the proposed travel corridor linking the Schofield Barracks Military Reservation (SBMR) and the Dillingham Military Reservation (DMR):

1. The singular focus on the “Dillingham Trail” alignment as the only travel corridor between SBMR and DMR fails to consider and fully address other viable alignments through Western United’s property, the Dillingham Ranch.
2. The adverse environmental and economic impacts to Western United’s property in Mokuleia—which the proposed alignment would bisect—have not been adequately addressed.

In particular, it is noted that salient information provided to your staff by Western United has been inexplicably ignored in the preparation of the DEIS. Western United finds this omission disturbing, given the pertinence of the information to the proposed action.

Consideration of Alternate Travel Corridors

N37-1 | Over the past year, meetings were held by Western United representatives with project planners and engineers for the Army on numerous occasions. Based upon what Western United

N37-1

The Dillingham military vehicle trail alignment shown in the EIS is the Army's preferred alignment based on informal discussion with property owners. 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. As discussed in Chapter 2, the Army will be transporting munitions and other training supplies on Dillingham Trail. Section 4.12 discusses that the Army will implement its Spill Prevention Plan for all such activities. Anticipated impacts are expected to be less than significant.

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believed to be a frank and open dialog, Western United was under the impression that the parties were working in good faith to identify viable alternative alignments for the corridor that the convoys would traverse between SBMR and DMR. It was anticipated that the discussions would result in a comprehensive environmental evaluation of each of alternative routes. Instead, the DEIS is limited to the discussion of a single alignment, which provides no basis for a comparative assessment.

The extent of Western United's interaction with the Corps of Engineers and other parties representing the Army is summarized below:

- 5 March 2003: Western United's project attorney met with Carl Larson, Michael Sakai and Darren Walls of the Army Corps of Engineers. At that meeting, it was disclosed that the Army would be proposing a Stryker access corridor along an old cane haul road that bisects Western United's property. At that time, the Army's representatives were aware of the potential adverse impacts of this alignment to Dillingham Ranch, as well as to a neighboring banana farmer. At that meeting, it was indicated that the proposed alignment was preliminary and other options for the travel corridor would be explored.
- 10 April 2003: A subsequent meeting was held at the Corps of Engineers, during which Western United received a briefing of the proposed project from Michael Sakai, Darren Walls and Richard Rodier. At that meeting, a master plan of the proposed Dillingham Ranch development (a rural agricultural community consisting of 80 lots) was presented to your staff. It was emphasized that the planned community would be permitted under existing land use entitlements and that implementation of the development would not encounter extended processing times. In addition, it was pointed out that the easement for the former cane haul road (identified as the Dillingham Trail in the DEIS) had been cancelled when Dillingham Ranch was purchased in August 2002, reverting the easement to private ownership and use.
- 23 April 2003: A site inspection was hosted at Dillingham Ranch by company representatives, its project attorney, and its project planner for ten representatives of the Army from the Corps of Engineers, Division of Public Works and Environmental Division. The primary purpose of the site inspection was to explore alternative alignments for the proposed corridor. Western United representatives emphasized their ongoing efforts in implementing Western United's agricultural community master plan and the cancellation of cane haul road easement.

The merits and feasibility of two alternate alignments were identified and initially explored during the site inspection. These alternate alignments were:

- Alternative 1 – A mauka route using a portion of the existing DLNR road (called the Mokuleia Access Road in the DEIS) and a mid-level alignment for the corridor across Western United's property to reach the DMR,

N37-1
cont'd

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- Alternative 2 - A makai route that would use the DLNR road to reach Farrington Highway, an improved two-lane roadway. From this point, the corridor would use a one-mile segment of Farrington Highway running west to Dillingham Air Field to access the DMR

At that meeting, the potential for a negotiated land purchase or exchange was also discussed in regard to approximately 1,000 acres of Western United's property that abuts the DMR.

- 21 July 2003: A subsequent site inspection was conducted at Dillingham Ranch with representatives of the Army, including Tom Piskel, Horace Puxitoy, Alvin Char and Victor Garo. The purpose of this follow-up inspection was to further explore a land exchange or purchase of portions of Western United's property for Army training and environmental mitigation. A test in regard to the feasibility of creating a mid-level route for the corridor, Alternative 1, was also conducted during this site inspection. The Directorate of Public Works requested a helicopter reconnaissance of the site, but such reconnaissance has not taken place.

At the second site inspection, it was again emphasized that the master plan for Dillingham Ranch had been prepared based on existing entitlements. Once again, the Army representatives present were reminded that the portion of the cane haul road easement through the property had been cancelled.

- 28 October 2003: Western United's project planner attended the public information meeting on the DEIS at the Honolulu Country Club. At that meeting, Western United representatives expressed Western United's concern to facilitators that the DEIS illustrated only the Dillingham Trail venue through Western United's property. Western United pointed out that the document failed to discuss the alternate alignments for the corridor—Alternate 1, which would create a mid-level route or Alternate 2, which would run makai and use a portion of Farrington Highway.

In light of the foregoing chronology, the discussion of only one alternative for establishing a travel corridor between SBMR and DMR—i.e., one that bisects Western United's property (see Land Acquisition/ Easements on pages 2-34, 2-35)—represents a serious deficiency in the DEIS.

Impacts to Dillingham Ranch

In addition to the singular focus on the proposed alignment for the Dillingham Trail, the related concern is the limited depth of the assessment as to how the proposed corridor would impact Western United's property. Specific comments on the DEIS are as follows:

1. Section 4.2, Land Use/Recreation, page 4-5, states that impacts on land use were assessed based on whether "project activities" were: 1) consistent with state and local plans and 2) compatible with existing and planned land uses. The DEIS states minimally (in Chapter 6, Dillingham Military Reservation, Land Use/Recreation,

N37-2

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. The Dillingham Trail is discussed as a separate construction activity in Chapter 6 – Dillingham Military Reservation. Land use impacts are discussed in Section 6.2 – Land Use/Recreation including Dillingham Trail which has been called out in separate paragraphs throughout. The EIS does acknowledge that impacts would occur to current land use, however they are determined to be less than significant. Future property values are based on several factors that fall outside of the purview of the Army action. It would be speculative in nature for the Army to assume either positive or negative impacts to adjacent property values. If the Army decides to implement the proposed action, the Army will implement mitigation measures to help keep the proposed action to less than significant levels of impact where practicable.

**N37-1
cont'd**

N37-2

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cont'd**

Surrounding Land Uses, page 6-14) that Dillingham Ranch, a former cattle ranch, is approximately 1.6 miles west-southwest of DMR and that its uses includes horse stables. Environmental impacts associated with the proposed action relative to the acquisition of an easement and construction of the Dillingham Trail were judged to be less than significant and impacts were not expected to significantly affect land use (page 6-18). Western United strongly disagrees.

a. Since the corridor between SMBR and DMR is an integral part of training logistics, it should be considered a part of the "project area" and discussed as a major component of the proposed action. The DEIS did not discuss the impacts to planned land uses on or around the travel corridor, despite the fact that specific information had been provided as early as April 2003.

N37-3

b. The DEIS fails to address impacts to ranching operations, presently the primary land use activity and an integral element of Western United's master planned agricultural community. Degradation of the pristine environment of Dillingham Ranch, including noise, vibration, dust, visual distractions and other adverse impacts associated with convoy movements have not been addressed. These activities have a direct impact on Western United's livestock breeding operations, equestrian training facility, exercise yards and stables. In addition, the effects on the planned agricultural community are completely ignored.

N37-4

c. The DEIS does not disclose how access to the agricultural lots to be situated on the mauka portions of the property can be accommodated in the event the proposed Dillingham Trail corridor is implemented. Basic questions have not been addressed with respect to whether the proposed corridor would be fenced and gated, which would impede access and freedom of movement within Dillingham Ranch.

N37-5

Additional questions relate to whether the proposed corridor would create negative impacts with respect to safety, noise, air quality and vibration on the adjacent farm dwellings. Further questions relate to whether maintenance of the proposed corridor would create a visual blight that would impact the planned agricultural community.

N37-6

2. Section 6.7, Traffic, page 6-48, states that a perpetual easement of 55 acres would be acquired from private landowners for the Dillingham Trail. Should this occur, what provisions are contemplated to provide alternate access to present owners and lessees who have been using portions of the cane haul road to access their agricultural fields and homes? Does the Army intend to limit the Dillingham Trail to military use? This matter is not addressed by the DEIS.

N37-7

a. The DEIS fails to adequately address the environmental and economic impacts of the proposed corridor on the rural agricultural community proposed by Western United's master plan for Dillingham Ranch. As depicted in the DEIS, the Dillingham Trail follows a former cane haul road easement that has been legally

N37-3

If the proposed project is selected and the Army decides to acquire this easement, it will be a joint use road, accessible by both the property owner and the Army. The Army will work with the property owners on a notification process to minimize potential interference with regular farming practices.

N37-4

If the proposed project is selected and the Army decides to acquire this easement, it will be a joint use road, accessible by both the property owner and the Army. The Army will work with the property owners on a notification process to minimize potential interference with regular farming practices.

N37-5

The impacts of the proposed corridor and described in Chapter 6 – Dillingham Military Reservation. Significant but mitigable impacts to visual and cultural resources from land easements and trail construction were identified. There were no other significant impacts identified.

N37-6

If the proposed project is selected and the Army decides to acquire this easement, it will be a joint use road, accessible by both the property owner and the Army. The Army will work with the property owners on a notification process to minimize potential interference with regular farming practices.

N37-7

If the proposed project is selected and the Army decides to acquire this easement, it will be a joint use road, accessible by both the property owner and the Army. The Army will work with the property owners on a notification process to minimize potential interference with regular farming practices. Future property values are based on several factors that fall outside of the purview of the Army action. It would be speculative in nature for the Army to assume either positive or negative impacts to adjacent property values. If the Army decides to implement the proposed action, the Army will implement mitigation measures to help keep the proposed action to less than significant levels of impact where practicable.

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N37-7
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cancelled. The alignment for the proposed corridor would bisect the rural agricultural community and disrupt access to approximately 60 subdivided lots.

In terms of ranching operations, the proposed corridor would also impede the movement of livestock from the makai areas of the ranch to the mauka pastures that are a vital component of the working ranch. The Dillingham Trail would significantly affect the economic value of the working ranch and the master planned agricultural community. The decrease in economic value also creates potential hardships for the lot owners, which could lead to undesirable impacts on the social fabric of the community.

N37-8

b. The DEIS fails to disclose details in regard to access. Will the entire corridor through Dillingham Ranch be fenced and gated as a security measure? Will there be provisions for access points to permit the required movement of livestock throughout the working ranch? Alternately, will unfettered access be permitted to the owners of the subdivided agricultural lots contemplated by the master plan for Dillingham Ranch?

N37-9

3. Section 6.7. Traffic, page 6-49, estimates the volume of military vehicle traffic between SBMR and DMR. The DEIS indicates that the maximum number of vehicles per convoy would be 24, sequenced at 15- to 30-minute intervals, with a maximum volume of 96 vehicles per hour. The convoys would be scheduled for non-peak hour traffic times. In terms of annual frequency, the convoys between SBMR and DMR would occur 4 times per year. The DEIS further states that the identified impact would be less than significant, and no mitigation would be necessary. Western United seriously questions the basis on which such a determination was made. Questions abound as to the criteria used to arrive at this conclusion. Specific points are as follows:

a. What would be the total number of vehicles (not vehicle density) involved in a Company Level exercise? At what hours of the day would these convoys pass through Dillingham Ranch during each exercise (i.e., How early? How late?). What would be the duration of operations during the four scheduled exercises (i.e., one day, one week, one month or some other period?). At what speed would the convoy move through Western United's property? What would be the duration required for a typical convoy to pass through Dillingham Ranch?

N37-10

b. During Company Level exercises, how would access across the proposed road be handled? Who would be liable for accidents at crossings? Would the owners of the agricultural lots have advance notice of scheduled exercises and convoy travel times? What accommodations would be made for the movement of private vehicles between the mauka and makai areas of Western United's property?

N37-11

c. The DEIS does not disclose what would be transported through Western United's property during Company Level exercises. Although the DEIS states that only blank ammunition will be used at DMR, would any live ordnance be transported

N37-8

If the proposed project is selected and the Army decides to acquire this easement, it will be a joint use road, accessible by both the property owner and the Army. The Army will work with the property owners on a notification process to minimize potential interference with regular farming practices. 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 Dillingham trail will be coordinated with the property owner to prevent unauthorized use, reducing the risk of vandalism to other facilities in the area.

N37-9

If the proposed project is selected and the Army decides to acquire this easement, it will be a joint use road, accessible by both the property owner and the Army. The Army will work with the property owners on a notification process to minimize potential interference with regular farming practices. The proposed activity on this trail is as follows ; (1) Daily activity - range control vehicles patrolling daily with shift changes; (2) Frequent by non-daily activity - small military vehicle traffic (e.g. Jeeps); (3) Infrequent activity - Convoys of 10 or more vehicles. These convoys would be coordinated with the property owner prior to execution; (4) Twice a year activity - Convoys of 200 or more vehicles. When these convoys are proposed, they would also be coordinated with the property owner. Convoys of this size run in maximum of 20 vehicle groupings with space between convoy segments.

N37-10

If the proposed project is selected and the Army decides to acquire this easement, it will be a joint use road, accessible by both the property owner and the Army. The Army will work with the property owners on a notification process to minimize potential interference with regular farming practices.

N37-11

If the proposed project is selected and the Army decides to acquire this easement, it will be a joint use road, accessible by both the property owner and the Army. The Army will work with the property owners on a notification process to minimize potential interference with regular farming practices. This has been not been identified as a significant impact in the DEIS. The Army has a spill prevention plan to minimize the potential for spills and for fast response and cleanup to any spills that may occur.

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through Dillingham Ranch as part of an exercise? Would hazardous materials, including but not limited to explosive munitions, petroleum products and chemical agents, be transported through Western United's property? What would be the risks associated with spills of hazardous materials, including the potential contamination of Western United's grazing lands and waterways? Would the Army be responsible for clean-up operations?

The DEIS is extremely deficient in addressing the potential impacts on Dillingham Ranch related to the proposed corridor through prime areas of the working ranch. In addition, the adverse impacts caused by the movement of convoys through Western United's property during the exercises at DMR have been ignored.

Conclusion

The Dillingham Trail, as discussed in the DEIS, would cut a major swath through Western United's property. The travel corridor would create significant consequences with respect to internal circulation, operation of the working ranch and the character of the planned agricultural community. The proposed corridor and the related convoy movements would generate significant adverse impacts on Dillingham Ranch that extend well beyond a 21-foot wide easement.

We urge the Army to fully address the two major deficiencies of the DEIS noted above, so that a comprehensive and accurate assessment of project impacts can be determined, including the consideration of appropriate mitigation measures.

Thank you for this opportunity to provide comments on the DEIS.

WAIHEE & NIP

By 
Renton K. Nip

Comments

-----Original Message-----
From: Borne Ronald USAG HI TRANSFORMATION OFC [mailto:ronald.borne@us.army.mil]
Sent: Friday, October 17, 2003 6:40 PM
To: Mallon, Anna L USAG HI TRANSFORMATION OFFICE
Cc: Barger, Cindy S POH
Subject: FW: Waikii Ranch Meeting

Anna
 Comments for our EIS/.

Ron Borne
 Transformation Manager
 Office (808) 656-0255, pager (808) 273-9338
 Mahalo for your support

-----Original Message-----
From: Clarke Frederick S LTC USAG-HI PTA [mailto:ClarkeFS@SHAFTER.ARMY.MIL]
Sent: Friday, October 17, 2003 6:04 PM
To: Anderson David L COL USAG HI CMD GRP
Cc: Borne Ronald USAG HI TRANSFORMATION OFC; Egami Mike T USAG HI CMD GRP; Hansen Christine J USAG-HI PTA; McElroy Robert H USAG-HI PTA
Subject: Waikii Ranch Meeting

Sir
 Good meeting with the Waikii Board of Directors this morning. They were very happy that we took the time to come see them and that we felt it important to get their thoughts.

Here were their concerns in order:

- N38-1** | 1 Buffer Zone required (The figure of 1 mile was thrown out but I believe it was not a formal or hardline request but a starting point for negotiations).
- N38-2** | 2 A road within the Buffer to act also as a fire break
- N38-3** | 3 Wildfire Management Plan in place (I brought with me Fire Chief Moller which they very much appreciate as fire is definitely a concern). Chief took some time to meet with their fire department representative and they express gratitude for our good neighbor policies.
- N38-4** | 4 They are concerned about the soil type of the area and what the real recovery period will be even if ITAM mitigation methods are utilized.

Responses

N38-1

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

N38-2

The WFMP considers the potential need of firebreak and/or fuel breaks at all Army installations including West PTA if the Army decides to acquire this parcel. Specific locations of firebreak roads will be determined based on the recommendations of the IFSO. The WFMP and Army IFSO will ensure that all adjacent properties are protected from wild land fires including Waiki'i Ranch, if the Army decides to acquire West PTA Acquisition Area.

N38-3

The Army's Integrated Wildland Fire Management Plan has been completed and specific measures are detailed to reduce chance of and impact from wildfires. These measures are detailed in the biological resources chapters under appropriate mitigation and the hazards chapters.

N38-4

A full discussion of soil is located in Chapter 8.9.

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N38-5 | 5 They express concern about noise but feel that this can be mitigated by buffer.

*They offered an alternative piece of land for the Army to consider on the South side of Waikoloa but did not elaborate much.

N38-6 | They did not believe they would gather big objections from their community on were the Military Vehicle Trail would be if there was a buffer.

They also mentioned that it was much more favorable to have us own the land than another developer.

They will submit their formal response to the EIS soon.

Overall a good open discussion and feel for what their concerns are.

V/R

FRED S CLARKE

LTC , AD

POHAKULOA TRAINING AREA COMMANDER

"ATTITUDE IS EVERYTHING"

(808) 969-2400

N38-5

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.

N38-6

A discussion of alternate locations for land acquisitions can be found in Section 2.6.6 of the EIS.

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December 15, 2003

Letter
N39

COMMENTS ON THE ARMY TRANSFORMATION DRAFT ENVIRONMENTAL IMPACT STATEMENT

This document contains the comments of the Waiki'i Ranch Homeowners' Association ("the Association") regarding the Army Transformation Draft EIS. These comments only address the West Pohakuloa Acquisition Area (WPAA) portion of the EIS.

LAND USE

The Draft EIS concludes the impact (Tables 4-1, 8-8) is "less than significant". The Association believes the impact from the proposed action is **Significant** for the following reasons:

The proposed WPAA land is presently owned by Parker Ranch and is zoned "agricultural" in the County of Hawaii General Plan. The draft EIS (8-27) acknowledges that, "The proposed training land use of agricultural grazing land at the WPAA is not consistent with the land use set forth in the County of Hawaii General Plan."

N39-1

However, the draft EIS fails to address or acknowledge that the proposed WPAA land is located in an "agricultural district" regulated under the State Land Use classification system established by HRS Chapter 205 and administered by the State Land Use Commission ("LUC"). Permitted activities and uses in an agricultural district include: "cultivation of crops, orchards, forage, and forestry; farming activities or uses related to animal husbandry, aquaculture, and game and fish propagation; . . . wind generated energy production . . . ; bona fide agricultural services and uses which support the agricultural activities of the fee or leasehold owner of the property. . . ." HRS § 205-2(d). The military uses proposed for the WPAA land are not consistent with the state agricultural land use classification.

The State LUC must approve land use district boundary amendments involving land areas greater than 15 acres. HRS § 205-3.1(a). Under HRS § 205-4(h), the LUC may approve an amendment of a land use district boundary only if the petitioner establishes by a preponderance of the evidence that the proposed amendment does not violate HRS § 205-2 (districting and classification of lands) and is consistent with policies and criteria established pursuant to HRS § 205-16 (compliance with Hawaii state plan) and § 205-17 (decision-making criteria). The LUC must consider the proposed reclassification's impact on the preservation or maintenance of important natural systems or habitats; maintenance of valued cultural, historical, or natural resources; and maintenance of other natural resources relevant to Hawaii's economy, including but not limited to, agricultural resources. HRS § 205-17. The Department of the Army must obtain a state land use boundary amendment before proceeding further.

N39-1

During the EIS review process, the Army has coordinated with Natural Resource Conservation Service and is compiling with all requirements of the Farmland Policy and Protection Act (FPPA). (See Sections 4.2, 8.2, and Appendix E.) If the Army decided to implement the proposed action, the management and use of the West PTA acquisition area would be conducted per federal regulations and guidelines. State regulations and guidelines do not apply to federal actions. However, the Army has considered State policies in its overall assessment of impacts in the EIS. In following FPPA requirements, CEQ guidance and Army policy, the Army has determined that the proposed conversion of West PTA acquisition area is consistent with these regulations and guidance and the impact would be less than significant.

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N39-1
cont'd

Hawaii State Third Circuit Court Judge Ronald Ibarra recently ordered a developer to stop all work on a several hundred acre residential development of agricultural lands in Kona in *Kelly v. 1250 Oceanside Partners*, Civil No. 00-1-0192K (Third Circuit Court, State of Hawaii). Although the developer had previously obtained the County of Hawaii's approval of its residential subdivision, Judge Ibarra required the developer to obtain reclassification of the agricultural lands before the State LUC. Military training on the WPAA land that will cause air quality impacts and soil loss due to wind and water erosion (5.5, 5.9, 7.5, 7.9, 8.5, 8.9) is not an appropriate use of agricultural land. Given Judge Ibarra's ruling in the *Oceanside* case, the Department of the Army must apply for and obtain a district boundary amendment for the WPAA lands before it may proceed with any military uses.

Uses that are not expressly permitted in the agricultural district in HRS Section 205-4.5(a) are prohibited under HRS Section 205-4.5(b) with limited exceptions. The exceptions are: (1) uses allowed under special permits granted under HRS Section 205-6, and (2) nonconforming uses that preexisted the establishment of the agricultural district under HRS Section 205-8. HRS Section 205-4.5(b). The County Planning Commission may grant special permit for areas of land fifteen acres or less. HRS Section 205-6(d). However, special permits for areas of land greater than fifteen acres are subject to the approval of the Land Use Commission. *Id.*

The Hawaii Supreme Court recently held that HRS Chapter 205 "clearly limits the permissible uses allowed within an agricultural district. *Save Sunset Beach Coalition v. The City and Count of Honolulu*, No. 21332, slip op. at 35 (Haw. Oct. 20, 2003). In *Save Sunset Beach Coalition*, the Court held that special permits granted under HRS Section 205-6 to allow "unusual and reasonable uses" within an agricultural district other than those for which the district is classified "cannot be utilized to circumvent the essential purpose of the agricultural district." *Save Sunset Beach Coalition*, slip op. at 36. The use "[can] not change the essential character of the agricultural district nor be inconsistent therewith" and may "not contravene the general purpose of an agricultural district." *Id.*

The land use reclassification/boundary amendment process is complex, and requires the LUC to consider and evaluate a number of criteria set forth in HRS § 205-17. Hawaii courts take these criteria seriously. One of the criteria, for example, requires the LUC to consider impacts on cultural and historic resources. In *Ka Pa'a Kai O Ka'Aina v. Land Use Commission*, 94 Hawai'i 31, 7 P.3d 1068 (2000), the Hawai'i Supreme Court reiterated that state agencies like the Land Use Commission had an obligation to protect, to the extent possible, traditional and customary practices of Native Hawaiians protected by Hawaii's Constitution, Article XII, Section 7. In order to protect these practices, the Court held that the LUC needed sufficient information to understand what practices existed, the extent of the practices, and how the development would affect those practices. In other words, the LUC or the petitioner was required to prepare the equivalent of a cultural impact statement. In 2000, the State Legislature amended Hawaii's environmental impact assessment/statement law and NEPA equivalent, HRS Chapter 343, expressly requiring an evaluation of impacts on cultural practices in

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environmental assessments and impact statements necessary for state permits like an LUC boundary reclassification. HRS § 343-2. The State Office of Environmental Quality Control, the agency charged with administering portions of HRS Chapter 343, has required that assessments of a proposed action on cultural practices include all ethnicities. Reclassification of the WPAA lands owned by Parker Ranch that are in the agricultural district may require an inquiry into the effects on the ranching or "paniolo" culture, which are not discussed in the draft EIS.

N39-2

Chapter 8.9 (8-104) states that "the loss of other important agricultural lands through conversion to military use is considered a significant impact, pending a formal determination by NRCS. The impact is considered potentially mitigatable and is discussed in the section on Land Use." However, Chapter 8.2's (land use) description of possible mitigation is so vague that the Association cannot reasonably determine whether or not the impacts will be reduced to non-significant levels. The draft EIS provides that Integrated Training Area Management (ITAM) program would be used "to identify and mitigate potential impacts on the land." (8-28). The draft EIS claims that the Army is "considering establishing 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." Given that the number of training exercises would increase to 40 to 60 exercises per year in the WPAA, and that these activities may strip areas of vegetation and necessitate revegetation efforts that have been unsuccessful in the PTA in the past (8-105), the idea of continued grazing in the WPAA and other agricultural areas seems implausible or impractical. The "mitigation" proposed in the draft EIS does not appear to reduce the potential impacts to non-significant levels.

AIR QUALITY

N39-3

The Association agrees with the conclusion that the proposed action under the subjects "Fugitive dust from military vehicle use" and "Wind erosion from areas disturbed by military vehicle use" is **Significant**. In addition we believe another Impact Issue should be added, that being "Wind erosion from areas burned by wildfires". The impact of this subject would also be **Significant**. We also request the portions of Chapter 4.5 and 8.5 relating to the dust storms at Waiki'i Ranch in 1999 be rewritten to reflect the severity of what actually took place.

The use of the WPAA land for off road exercises and the highly increased risk of wildfires (and resulting dust storms) will cause a significant degradation of air quality. The fine dust will be a hazard to the health of Waiki'i Ranch residents. It will also cause property damage.

The references in the draft EIS to a dust storm (4.5 & 8.5) resulting from a wildfire in the WPAA implies that there was a single and discrete dust storm. However, after the fire, dust storms occurred several times a week for a period of over two months. Affected homes at Waiki'i Ranch were evacuated for over two months. Dust accumulated in homes at a rate of up to ¼ inches per week, even though the homes were sealed to the

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N39-2

Conversion of the WPAA to military use is described as a less than significant impact in Section 8.2.2. However, 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. However, as discussed in Chapter 9, the Army acknowledges that the cumulative impact on the conversion of agricultural lands from past, present and reasonable foreseeable future actions would be significant. The farmland conversion rating forms are included in Appendix E of the Final EIS.

N39-3

The discussion of fugitive dust issues has been expanded in the Final EIS to include results of dispersion modeling to estimate PM10 concentrations from vehicle activity on unpaved roads and in off-road maneuver areas and training activities. The Army has committed to mitigating dust from vehicle traffic on unpaved roads through a combination of dust control chemical applications and/or 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. The Final EIS concludes that the potentially significant impacts from fugitive dust can be mitigated to a level that is less than significant. A separate analysis was added to Chapters 4.3, 5.3, 6.3, 7.3, and 8.3 - Visual, concerning the impacts of dust on the visual resources. In the Final EIS, the Army has expanded the discussions on the potential risks of wildland fires from the Proposed Action.

Comments

- N39-3 cont'd** | extent possible. Many of the furnishings were ruined, and the rest had to be moved out, cleaned, and placed into temporary storage until the dust storms eased. Each homeowner's insurance claims were quite large.
- N39-4** | Dust caused by military vehicle use and erosion (both from military vehicle use and wildfires) will also cause visual impacts. During the dry season, it is common to see dust clouds created by vehicles from miles away. However, a discussion of visual impacts (i.e., dust plumes from military vehicle use) is not included in Chapter 8.3 of the draft EIS. We request that the Department of the Army make further inquiry into and discuss these visual impacts. We believe that these impacts are significant and may not be mitigatable due to the lack of a ready source of water available for dust control during training activities.
- N39-5** | Dust will also likely cause human health impacts and hazards, exacerbating medical conditions such as asthma or other lung diseases (e.g., lung cancer). Several homes at Waiki'i Ranch were evacuated for several months following dust storms in large part because of health concerns. Although Chapter 8.5 (8-51) mentions fugitive dust emissions "are important because they are easily airborne and are small enough to be inhaled deep into the lungs creating potential adverse health effects," Chapters 8.5, 8.12, and Appendix G do not address the impact of increased dust emissions on human health, particularly on the residents of Waiki'i Ranch who will be closest to, and surrounded on three sides by, the activities proposed for the WPAA. We believe that these potential health impacts may be significant and non-mitigatable.
- N39-6** | We request that further inquiry be made into the human health hazards associated with the increased fugitive dust and wind erosion and that a discussion be included in Chapter 8.12.

Responses

As discussed in Section 8.5 - Air Quality the impacts from wildland fires is proposed as significant but mitigatable to less than significant with the implementation of the updated IWFMP and other measures. The updated IWFMP is available upon request.

N39-4

A separate analysis was added to Section 8.3 - Visual, concerning the impacts of dust on the visual resources.

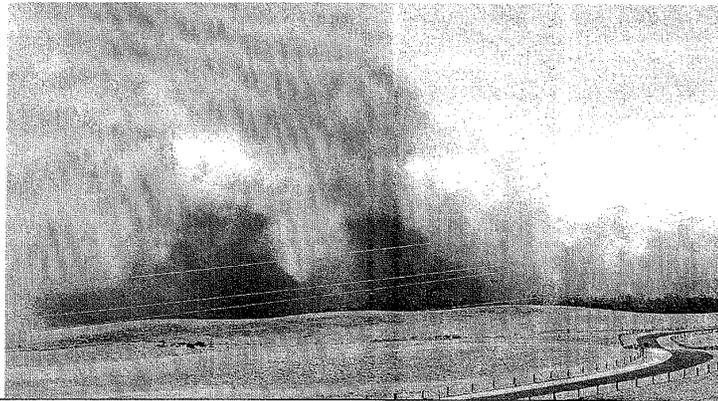
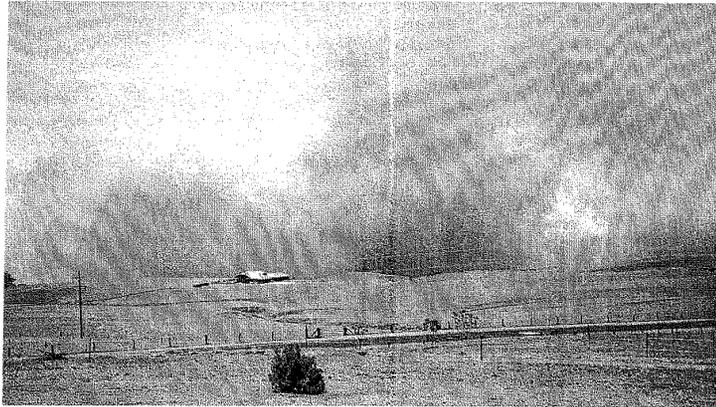
N39-5

The Army's analysis has determined that there would be no significant impacts on human health and safety that cannot be mitigated to less than significant level. The impacts of the project on human health and safety can be found in section 8.12 - Human Health and Safety Hazards in the FEIS. The finding of no significant impact is based in part of the Air Quality analysis. The discussion of fugitive dust issues has been expanded in the Final EIS to include results of dispersion modeling to estimate PM10 concentrations as described in Section 8.5. The implementation of the Integrated Wildland Fire Management Plan would reduce the overall risk of fire to less than significant. 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.

N39-6

The discussions in Section 8.12 have been expanded in the Final EIS to better discuss the potential impacts of wildland fires and fugitive dust. The Army's analysis has determined that there would be no significant impacts on human health and safety that cannot be mitigated to less than significant level. The impacts of the project on human health and safety can be found in section 8.12 - Human Health and Safety Hazards in the FEIS. The finding of no significant impact is based in part of the Air Quality analysis. The discussion of fugitive dust issues has been expanded in the Final EIS to include results of dispersion modeling to estimate PM10 concentrations as described in Section

Comments



Dust Storms at Waiki'i Ranch in July, 1999 following the June, 1999 Wildland Fire.

Responses

8.5. The implementation of the Integrated Wildland Fire Management Plan would reduce the overall risk of fire to less than significant. 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.

Comments

NOISE

N39-7

The increase in noise levels due to small arms fire and heavy weapons simulators is discussed in Chapters 4.6 & 8.6. The conclusion in 4.6 under the subject of "Noise from ordinance use" is "Significant". The conclusion in 8.6 is "Significant, but mitigable to less than significant". Table ES-5 adopts the conclusion of 8.6. This is inconsistent. The Association believes the impact from the proposed action is **Significant** for the following reasons:

N39-8

Waiki'i Ranch was developed and sold as a place where residents could live in a quiet peaceful environment. The location of the Ranch on sloping mountainside land is conducive to very efficient sound transmission. A dog barking a mile away is loud enough to be a nuisance. The center of the Ranch is approximately 9 miles from the headquarters area of Pohakuloa. When military training is taking place at Pohakuloa, the concussion from artillery and mortar fire is enough to rattle windows and shake the ground. Small arms fire can be heard clearly, particularly at night. Although no one on the Ranch likes this, it is accepted because the range was there before our community, and we knew what to expect in advance. Allowing additional sources of this type of noise to within less than ¼ mile from our borders is unacceptable.

N39-9

The discussions in 4.6 and 8.6 maintain that the noise levels from small arms fire and weapons simulators can be mitigated to a reasonable level by maintaining a distance of 500 feet (1,000 feet at night) from the borders of Waiki'i Ranch. We do not agree with this conclusion. The amount of noise that will be generated from training exercises and the frequency of those exercises on the WPAA will be significant, and will impact life on Waiki'i Ranch in an extremely negative manner. The mitigation proposed – a 500 foot buffer – is insufficient to mitigate noise impacts, given the Association's prior experience with training exercises at PTA. The 1,000 foot buffer for nighttime activities is also insufficient.

The impact of noise on humans is dependent on the normal background noise level. A 75 dB sound against the normal background noise level of a city is not a significant event. However, the same sound in a place like Waiki'i Ranch (with almost no background noise) is perceived as very loud.

N39-10

The noise testing done for the EIS is incomplete. There was no testing with weapons induced impulse sound sources from points within the WPAA. The Association requests the Department of Army to conduct on the ground tests at Waiki'i Ranch in consultation with the Association to determine the actual impulse noise impact from the ammunition and weapons simulators proposed to be used in the WPAA. In addition to measurement with electronic equipment, a neutral third party needs be present to provide a human impression of the noise impact from the weapons firing tests. We believe that such tests will reveal the impact of weapons noise to be at an unacceptable level.

There also appears to be a typographical error or portion missing on page 8-65 of the draft EIS, first sentence, which states: "Use of blank ammunition and simulator devices

Responses

N39-7

These sections have been revised in light of an additional noise analysis. Noise impact discussions regarding training activities at WPAA have been expanded in Section 8.6 in the Final EIS to include current estimates of helicopter flight activity at WPAA as well as additional information on small arms firing noise. The discussions also include information on the typical extent of annoyance related to the corresponding noise levels. The Army acknowledges that local residents may not agree with the criteria the Army uses to determine acceptable noise levels. As discussed in Section 8.6, impacts to noise from the Proposed Action at PTA are significant but mitigable to less than significant. Current noise levels are in compliance with the Army standards. If the Army decides to implement the Proposed Action, the Army proposes to mitigate noise levels at WPAA with a 1,000 foot daytime noise buffer and a 2,000 foot nighttime noise buffer on training activities.

N39-8

These sections have been revised in light of an additional noise analysis. Noise impact discussions regarding training activities at WPAA have been expanded in Section 8.6 in the Final EIS to include current estimates of helicopter flight activity at WPAA as well as additional information on small arms firing noise. The discussions also include information on the typical extent of annoyance related to the corresponding noise levels. The Army acknowledges that local residents may not agree with the criteria the Army uses to determine acceptable noise levels. As discussed in Section 8.6, impacts to noise from the Proposed Action at PTA are significant but mitigable to less than significant. Current noise levels are in compliance with the Army standards. If the Army decides to implement the Proposed Action, the Army proposes to mitigate noise levels at WPAA with a 1,000 foot daytime noise buffer and a 2,000 foot nighttime noise buffer on training activities.

N39-9

As described in Section 8.6, if the Army decides to implement the Proposed Action, the Army proposes to establish a minimum 1,000 foot daytime noise buffer around Waiki'i Ranch property and the Kilohana Girl Scout Camp. In addition, the Army will consider training guidelines that minimize nighttime training activities that involve weapons fire or aviation activity within a minimum of 2,000 feet of those properties. The Army will continue to work with affected communities on noise buffers and may adjust the buffer size dependent upon these discussions.

Comments

Responses

N39-11

in the WPAA area may create noise problems in the Waiki'i Ranch development and the Kilohana Girl Scout Camp, both of which share fence line boundaries with the Peak unweighted noise levels from blank ammunition typically would be about 94 dB at 2,500 feet from the most common types of arms." Portions of this sentence do not make sense, and we suspect there is something is missing.

N39-10

Noise impact discussions regarding training activities at WPAA have been expanded in Section 8.6 in the Final EIS to include current estimates of helicopter flight activity at WPAA as well as additional information on small arms firing noise and larger weapons. The discussions also include information on the typical extent of annoyance related to the corresponding noise levels. The Army acknowledges that local residents may not agree with the criteria the Army uses to determine acceptable noise levels. As discussed in Section 8.6, impacts to noise from the Proposed Action at PTA are significant but mitigable to less than significant. Current noise levels are in compliance with the Army standards. If the Army decides to implement the Proposed Action, the Army proposes to mitigate noise levels at WPAA with a 1,000 foot daytime noise buffer and a 2,000 foot nighttime noise buffer on training activities.

GEOLOGY AND SOILS

N39-12

The discussion in Chapter 8.9 is a thorough treatment of the soils and geology of the WPAA. We agree with the conclusion under the subject of "Soil Loss" in Table 8-18 that the impact is "Significant".

N39-11

The acronym WPAA was inadvertently left out. It has been inserted into the text in the Final EIS.

The Association believes the impact from "Soil erosion and loss from wildland fires" (Table 8-18) should be changed to **Significant** for the following reasons:

Our first hand experience with the effects of a nearby wildland fire in 1999 has shown us how extreme the effects can be. After the fire, nearly every day, large quantities of exposed topsoil were lifted by the wind and blown away. This went on for several months until the topsoil was essentially gone. The recovery of the affected area has been extremely slow. There are still areas of bare earth where plant life has not been able to reestablish itself.

N39-13

The draft EIS proposes certain mitigative measures, including land management and rehabilitation measures in the ITAM program, to reduce impacts to non-significant levels. However, the draft EIS acknowledges that Army's revegetation efforts in the PTA (presumably pursuant to the ITAM program) have been, to date, unsuccessful (8-105). Accordingly, the assumption that the proposed mitigation will reduce soil erosion and wildland fire impacts to non-significant levels appears to be unfounded.

N39-12

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.

Rainfall in the Waiki'i Ranch area ranges from an average 23 inches per year (long term Parker Ranch records) at the higher elevations to an average of 15 inches at the lower elevations. The WPAA spans an area that receives less than 10 inches a year at the lowest elevations, to 25 inches a year at the upper elevations. This is an arid (almost desert) climate zone. The ground cover of Kikuyu grass normally protects the topsoil from wind erosion, even though there are months at a time when it is brown from lack of rain.

N39-14

The proposed mitigation measures that involve reseeding and watering eroded areas are unrealistic. For such a plan to be effective, large amounts of water are needed. The Army has no source of water, and must truck water to Pohakuloa at great expense. The nearest source of water to the WPAA is the water system at Waiki'i Ranch. The two wells are over 4,000 feet deep, and are the deepest wells in the state. The direct cost of producing water for Waiki'i Ranch is \$8.50 per 1,000 gallons. The water system is run as a non-profit utility. The initial capital cost of each well was over \$1,000,000. This does not include the storage reservoirs and distribution system. It is unlikely that

N39-13

After further analysis the Army has changed the impact analysis on soil loss from training activities to significant. Although the mitigation measure described in Section 8.9 will reduce the impacts considerably they will not reduce them to less than significant. However, as discussed most of this soil loss will be from dust erosion the measures to be implemented (described below) will reduce soil erosion from other causes to less than significant and would minimize erosion into surface waters. Therefore their impacts to surface water quality due to soil erosion is still considered less than significant. The mitigation measures that will be put in place include: The Army will develop and implement a Dust and Soils Management and Monitoring Plan (DuSMMoP) for the training area. The plan will address measures such as, but not limited to, restrictions on the timing or type of training during high risk conditions, vegetation monitoring, soil monitoring, and buffer zones to minimize dust emissions in populated areas. The plan will determine how

Comments

the Army can produce water for less, assuming they invest millions in capital expense to build a water system.

N39-15

The soil in the Waiki'i area is so fine that large amounts of water are required during home construction for dust control. A home project on a forty acre lot has consumed over 600,000 gallons of water per month from June-October, 2003 just for dust control. The expense of using water for dust control and regrowth of vehicle and wildfire eroded land in the WPAA will be huge.

N39-16

The WPAA area surrounding our borders has almost no human traffic. The risk of fire is currently low. However, the addition of heavy vehicles and warfare simulation with explosive and pyrotechnic devices raises the risk of fire exponentially. The potential for severe damage to our community is very high, if WPAA is used as planned.

Responses

training will occur in order to keep fugitive dust emissions below CAA standards for PM10 and soil erosion and compaction to a minimum. The Army will monitor the impacts of training activities to ensure that emissions stay within the acceptable ranges as predicted and environmental problems do not result from excessive soil erosion or compaction. The plan will also define contingency measures to mitigate the impacts of training activities which exceed the acceptable ranges for dust emissions or soil compaction..

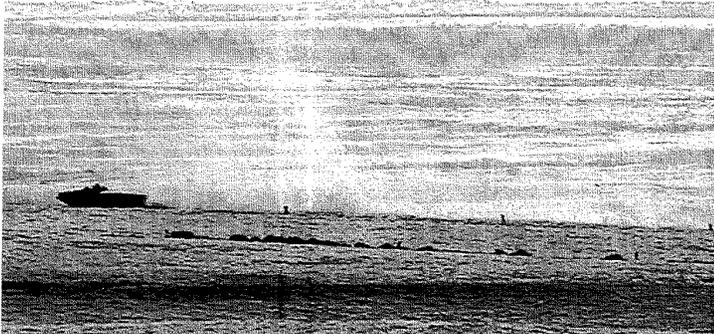
However the Army has determined, that with implementation of the following measures and programs the loss of soil from wildland fires would be significant but mitigable to less than significant. First the potential for a fire would be minimized by the Integrated Wildland Fire Management Plan. Since the publication of the Draft EIS, the Army has updated the Integrated Wildland Fire Management Plan (IWFMP). This update considered the issues surrounding the Makua Valley wildland fire of July 2003 and includes protocols to reduce the risk of a similar fire. As discussed in the Executive Summary, Sections 4.10 and 4.12, the IWFMP is proposed as mitigation to reduce the severity of the risk of wildland fires. The IWFMP is available upon request. The Army will also implement land management practices and procedures described in the ITAM annual work plan to reduce erosion impacts (US Army Hawaii 2001a). Currently these measures include: implementation of a training requirement integration (TRI) program; implementation of an Integrated Training Area Management (ITAM) program; Sustainable Range Awareness (SRA) program; development and enforcement of range regulations; implementation of an Erosion and Sediment Control Management Plan; coordinating with other participants in the Koolau Mountains Watershed Partnership (KMWP); and continued implementation of land rehabilitation projects, as needed, within the Land Rehabilitation and Maintenance (LRAM) program.

N39-14

Mitigation measures likely to occur are outlined in the Executive Summary. These proposed mitigation measures were included for public comment. The Army reviewed the measures based on public comments and the benefits of each measure to reduce impacts. The Army has listed those mitigation measures that are high priority and those that are unlikely to occur because of limited resource, unfeasible or there are similar measures already in place. The ROD will indicate which mitigation measures will be implemented. The use of the mitigation measures described by the commenter will be evaluated using the cost benefit analysis described above.

Comments

Responses



Military Armored Vehicle Traffic in WPAA just west of the western border of Waiki'i Ranch. 2002

N39-15

As a mitigation measure, the Army has committed to mitigating dust from vehicle traffic on unpaved roads through a combination of dust control chemical applications and/ or 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. There are no indications that wind erosion is a significant problem at locations on USARHAW installations where there is no disturbance by vehicle maneuver traffic. The installation of nets, tarps, or other protective covers in barren areas where there is no vehicle use might help reduce general precipitation-related soil erosion, but such actions would have little effect in addressing fugitive dust issues.

N39-16

As a measure to reduce the risk of wildland fires, the Army has updated and improved the Integrated Wildland Fire Management Plan. This plan was updated in October 2003 and is being fully implemented at all Army installations. The plan will be implemented to any new lands that the Army may acquire. The plan is available upon request.

Comments

HUMAN HEALTH AND SAFETY HAZARDS

There are very real human health and safety hazards to the residents of Waiki'i Ranch if the WPAA plan is implemented. These hazards are not adequately addressed in this section of the EIS, Chapter 8.12.

Chapters 4.5 and 8.5 (Air Quality) acknowledge that dust generated by vehicles and the subsequent wind erosion has the potential to create adverse health effects. (See above discussion on air quality.) The same chapters conclude that dust generation has a "**Significant**" impact, and is not mitigable. This should be included in the Human Health and Safety Chapters, and further studies and analyses should be completed to determine the health effects of the increased dust on residents of Waiki'i Ranch

N39-17

Further, the increased threat of wildfires is a direct threat to human health and safety, especially at Waiki'i Ranch. The draft EIS characterizes the increased chance of fire itself, and the likelihood of dust storms after the fire as significant, but mitigable to less than significant. (See above discussion on air quality.) We believe that an impact issue titled "Dust Particle Inhalation" should be added to the EIS, and that careful study and analysis of this issue will result in a determination that the potential impacts are **Significant**. For the same reasons, we believe that the impact from wildfires is potentially **Significant** and non-mitigable.

SOCIOECONOMICS

These chapters (4.13 and 8.13) completely ignore the socioeconomic impact upon the residents of Waiki'i Ranch that will occur if the WPAA plan is implemented. The Association believes the following impact subjects should be added to the Socioeconomic and Environmental Justice Chapters. These are "Loss of enjoyment of property" and "Loss of property value". Both of these impacts should be labeled as **Significant** for the following reasons:

N39-18

Waiki'i Ranch is surrounded by agriculturally zoned land. It was developed and sold as a place where a peaceful and tranquil rural life style could be enjoyed. The planned non-conforming use of the surrounding agricultural land involves health hazards, noise, and a highly increased threat of wildfires. This is certainly a significant social issue. In addition, the Army's planned acquisition of the surrounding agricultural land has already affected property values, and will have a greater effect if the plan is implemented. Local realtors have already reported lost sales when their clients learned of the Army's plans for the land that surrounds our community.

Responses

N39-17

The Army's analysis has determined that there would be no significant impacts on human health and safety that cannot be mitigated to less than significant level. The impacts of the project on human health and safety can be found in section 8.12 - Human Health and Safety Hazards in the FEIS. The finding of no significant impact is based in part of the Air Quality analysis. The discussion of fugitive dust issues has been expanded in the Final EIS to include results of dispersion modeling to estimate PM10 concentrations as described in Section 8.5. The implementation of the Integrated Wildland Fire Management Plan would reduce the overall risk of fire to less than significant. 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. The Army has determined that with the implementation of the IWFMP the impacts to Human Health and Safety would be significant, but mitigable to less than significant. The Army's analysis has determined that there would be no significant impacts on human health and safety that cannot be mitigated to less than significant level. The impacts of the project on human health and safety can be found in section 8.12 - Human Health and Safety Hazards in the FEIS. The finding of no significant impact is based in part of the Air Quality analysis. The discussion of fugitive dust issues has been expanded in the Final EIS to include results of dispersion modeling to estimate PM10 concentrations as described in Section 8.5. The implementation of the Integrated Wildland Fire Management Plan would reduce the overall risk of fire to less than significant. 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.

Comments

ALTERNATIVES

We present three alternatives to the published plan for the WPAA. We believe the probability is high that any one of these alternatives could mitigate the impact of army training operations in the WPAA to a tolerable level for the residents of Waiki'i Ranch. We believe these alternatives (and possibly others) to the proposed WPAA should be discussed in the final EIS.

N39-19 Even with a substantial buffer zone around Waiki'i Ranch, the issue of heavy weapons simulators will still have to be addressed, since our experience has shown that heavy weapons detonation, even at distances of over 5 miles, shakes the ground, rattles windows, and is generally unsettling.

1. Purchase the 23,000 acres from Parker Ranch as originally planned, and establish a 1.5 mile wide buffer zone around the borders of Waiki'i Ranch.

N39-20 Build a combination road / firebreak entirely around the border of the buffer zone. Fence the Waiki'i side of the road, and graze the buffer area with cattle when there is enough rain to promote growth of grass. Manage the area so the cattle are removed during periods of low rainfall. No army training activities would take place in the buffer zone. This buffer with fire break and controlled grazing would reduce the risk of wildfires, allow dust to disperse, and attenuate the noise generated by army training.

2. Modify the purchase of Parker Ranch land to exclude the 1.5 mile buffer zone around Waiki'i Ranch.

N39-21 Build a road / firebreak around the perimeter of the border of the buffer zone. Parker Ranch would continue to graze their cattle in the buffer zone.

3. Purchase land west of the Mamalahoa highway and east of Waikoloa Village.

N39-22 There are large tracts of undeveloped and uninhabited land (see map) west of Highway 190 that are suitable for off-road training using the Stryker vehicle. That area includes portions of the Pu'u Pa Maneuver area and the Recommended Cleanup area. The land is marginal agricultural grazing area, and is sparsely vegetated. The soil is firmer and more compacted than that in the Waiki'i area. The problem of dust generation by the vehicles should be less than in the presently planned WPAA. Since the PTA Trail goes right through this area, there is good access for training. A buffer of several miles can be maintained from Waikoloa Village and still leave a large area available for training.

Responses

N39-18

Future property values are based on several factors that fall outside the purview of the Army action. It would be speculative in nature for the Army to assume either positive or negative impacts on adjacent property values. The discussions and analysis in Sections 8.2, 8.3, 8.5, 8.6, and 8.12 were expanded in the Final EIS. Based on the expanded analysis, the Army changed the determination of effect in some cases.

N39-19

These sections have been revised in light of an additional noise analysis. Noise impact discussions regarding training activities at WPAA have been expanded in Section 8.6 in the Final EIS to include current estimates of helicopter flight activity at WPAA as well as additional information on small arms firing noise. The discussions also include information on the typical extent of annoyance related to the corresponding noise levels. The Army acknowledges that local residents may not agree with the criteria the Army uses to determine acceptable noise levels. As discussed in Section 8.6, impacts to noise from the Proposed Action at PTA are significant but mitigable to less than significant. Current noise levels are in compliance with the Army standards. If the Army decides to implement the Proposed Action, the Army proposes to establish a minimum 1,000 foot daytime noise buffer around Waiki'i Ranch property and the Kilohana Girl Scout Camp. In addition, the Army will consider training guidelines that minimize nighttime training activities that involve weapons fire or aviation activity within a minimum of 2,000 feet of those properties. The Army will continue to work with affected communities on noise buffers and may adjust the buffer size dependent upon these discussions.

N39-20

If the Army decides to implement the proposed action, the Army proposes mitigation measures to reduce the potential impacts from dust, wildland fires and noise at WPAA. In Section 8.5, the Army has conducted more detailed analysis and incorporated mitigation measures for training at WPAA that would reduce the significant impact from fugitive dust to Waiki'i Ranch to less than significant levels. If the Army decides to implement the Proposed Action, the Army proposes to establish a minimum 1,000 foot daytime noise buffer around Waiki'i Ranch property and the Kilohana Girl Scout Camp. In addition, the Army will consider training guidelines that minimize nighttime training activities that involve weapons fire or aviation activity within a minimum of 2,000 feet of those properties. The Army will continue to work

Comments

Responses

Letter
N40



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ADMINISTRATION
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FACSIMILE
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November 5, 2003

US Army Corps of Engineers
Bldg. 230, CEPOH-RE
Fort Shafter, HI. 96858-5440

Re: Proposed Army Trail from Kawaihae Harbor to PTA.

N40-1

We have been alerted by Waikoloa Land Co. that our property can not be used for easements to the Army due to restrictions in the conveyance documents. This apparently puts an end to our discussions on using some of our area to build a new trail.

I have revised the attached drawing of the proposed route to indicate an alternative if you do not use the existing trail.

Coming from Kawaihae and proceeding south across the property of the State of Hawaii-Palekoki Ranch Inc. and at the property line of WVA, veer southeastward to a point above the water company's wellfield along our property line with Parker Ranch, Richard Smart Trust. Then veer almost straight east along the Parker Ranch line to the Mamalahoa Hwy. crossing point now existing as part of the Old Tank Trail. Once you have crossed the Highway you would be on the 23,000 acres you are planning to purchase from Parker Ranch for maneuverability training without having to obtain easements or other arrangements.

I have annotated the new route in purple ink.

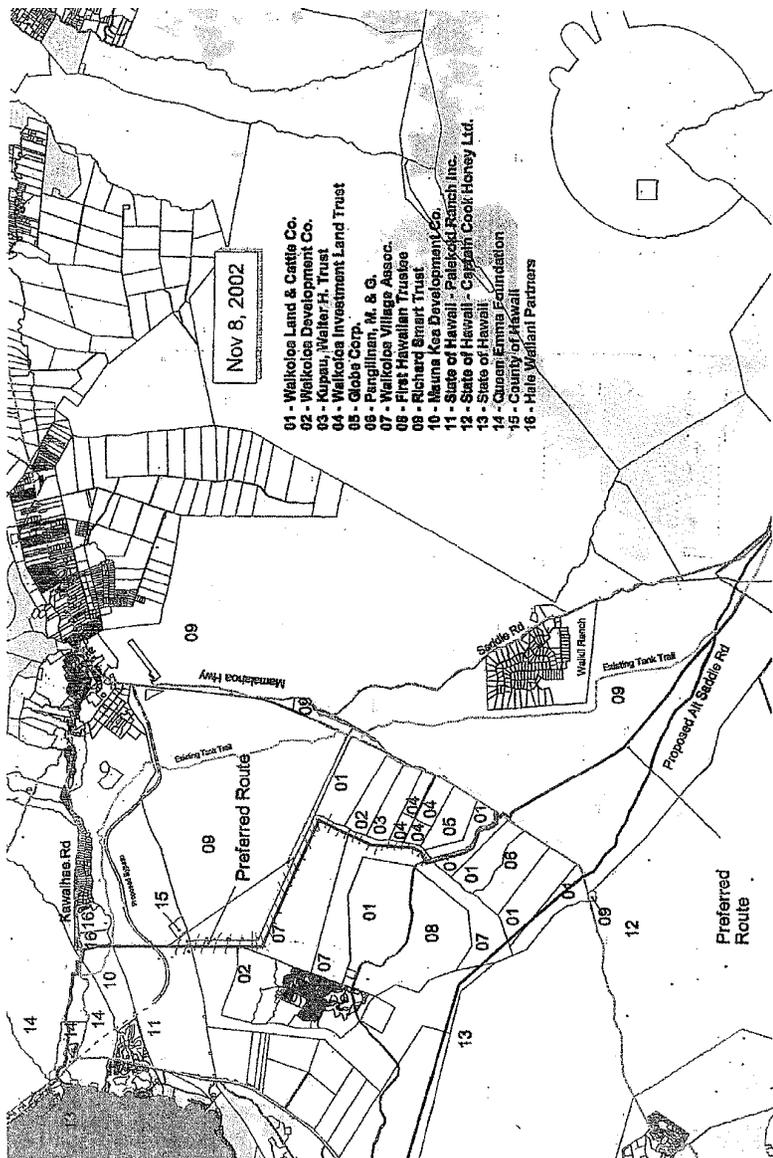
Sincerely

John Schick, CMCA, PCAM
General Manager, WVA

N40-1

The Army is continuing discussion with Waikoloa Village and all property owners on the potential acquisition of property by the Proposed Action. If the Army decides to implement the Proposed Action, the Army will continue to work with property owners on the final trail alignments. If the proposed trail alignment changes, the Army will negotiate with the property owners on a new alignment and will conduct appropriate analysis and appropriate documentation in accordance with NEPA, ESA, and NHPA.

Comments



Responses

Comments

Responses

WEST HAWAII WATER COMPANY

Letter N41

VIA CERTIFIED MAIL

December 19, 2003

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

Attention: Ms. Cindy Barger

RE: DRAFT EIS FOR THE 2ND BRIGADE, 25TH INFANTRY DIVISION (L) TO A STRYKER BRIGADE COMBAT TEAM (SBCT) IN HAWAII

Dear Ms. Barger:

This letter is to inform you of the comments of Waikoloa Water Co., Inc., also known as West Hawaii Water Company ("WHWC"), on the proposed relocation of tank trail for the proposed 25th Infantry Division Stryker Brigade Combat Team as described in the draft EIS dated October 2003. The water wells that provide potable water to Waikoloa Village and Waikoloa Beach Resort are located mauka of Waikoloa Village. The proposed new route for the Pohakuloa to Kawaihae (PTA) Trail traverses (a) the wellhead protection area for these wells, and (b) the area used by WHWC to operate these wells. (See Attachments A and B)

WHWC is concerned about this route for to the following reasons:

N41-1

1. Potential for Well Water Contamination. The Hawaii Wellhead Protection Program [Section 1428 of the 1986 Amendments to the EPA Safe Drinking Water Act] and the Source Water Assessment and Protection Program [Section 1453 of 1996 Amendments of the EPA Safe Drinking Water Act Mandated to Establish a National Source Water Assessment and Protection Program] regulate activities that can be detrimental to drinking water resources. The proposed new location for the PTA Trail falls within both the wellhead protection area for WHWC's potable well fields and the area used by WHWC to operate the wells. Relocating the PTA Trail within these areas would make the wells vulnerable to contamination from fuel spills or other contamination.

N41-2

2. Wind Blown Dust Problems. The proposed new PTA Trail location traverses and runs along adjacent property immediately upwind of WHWC's well field wells. Fugitive dust from vehicles using the trail will cause damage to the well motors and high voltage electrical equipment. This will affect the reliability of water supply for the Waikoloa Village and Waikoloa Beach Resort and increase WHWC's operating costs, which are ultimately borne by area residents.

150 Waikoloa Beach Drive • Waikoloa, Hawaii 96738 • Phone (808) 883-9355 • Fax (808) 883-9768

N41-1

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.

N41-2

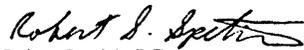
The use of dust control chemicals on unpaved roads is expected to adequately mitigate any impact on the operation of WHWC's wells. If concerns over pump operations remain, a simple enclosure of pump facilities would be sufficient to eliminate further concerns.

Comments

USACE Honolulu District
December 19, 2003
Page 2 of 2

- N41-3 3. Increased Fire Hazard. The proposed new PTA Trail location traverses and runs along adjacent property immediately upwind of WHWC's well field wells. Because the entire area is dry grassland, it is extremely vulnerable to range fires. Last year over 400 acres of land in this area was burned. Any fire originating from PTA Trail activities near the wells threatens not only WHWC's pumps, distribution system and electrical and mechanical equipment, but also threatens WHWC's ability to provide water to protect Waikoloa Village from fire.
- N41-4 4. Increased Well Vulnerability. The presence of the PTA Trail near WHWC wells will make them more accessible and vulnerable to acts of vandalism or terrorism. Hence, relocating the PTA Trail near WHWC well fields is contrary to the Public Health Security and Bioterrorism Response Act of 2001.
- N41-5 WHWC believes that the current route of the PTA Trail provides adequate access for the Army's proposed use, without creating the above mentioned problems. Therefore the PTA Trail should not be relocated as proposed.

Sincerely,


Robert Spetich, P.E.
General Manager

Attachment (2)

cc: Leighton Yuen, Esq.

Responses

N41-3

The Integrated Wildland Fire Management Plan for O'ahu and Pōhakuoloa Training Areas was updated on October 2003 incorporating lessons learned in the Makua fire. As discussed in the Executive Summary as proposed mitigation, the Army will fully implement this plan for all existing and new training areas to reduce the impacts associated with wildland fires. The Army has concluded that the impacts from fire with the implementation of IWFMP would reduce the impacts from fire to less than significant. The plan is available upon request.

N41-4

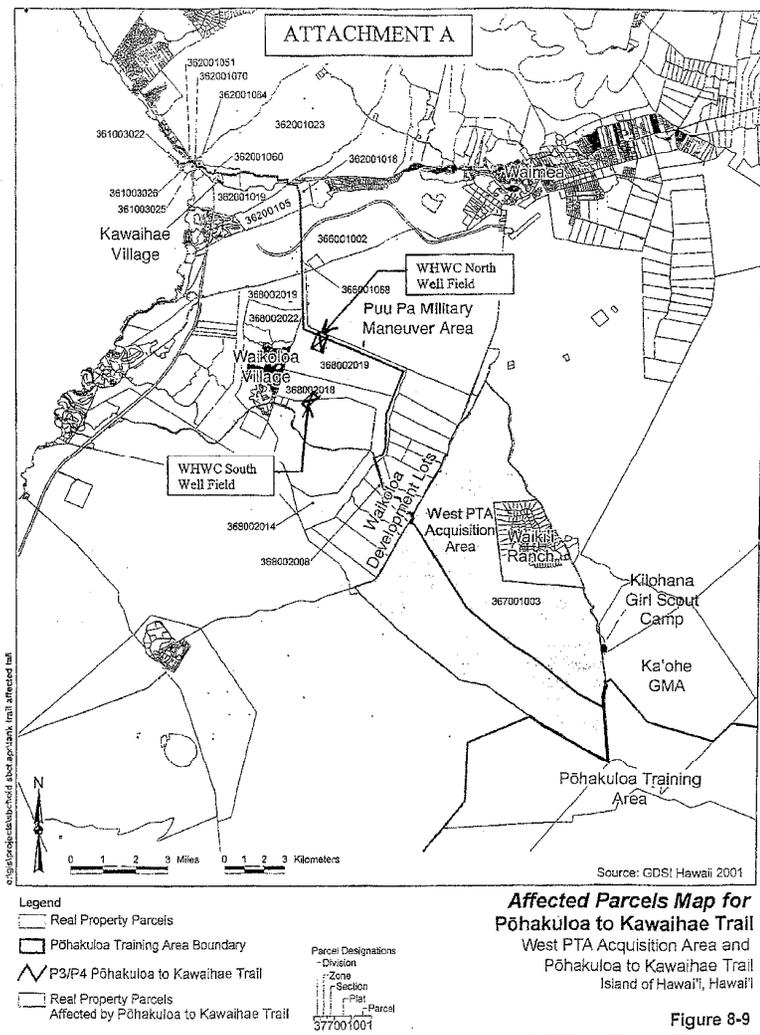
The EIS has determined that there would be no significant impact from vandalism to other facilities by the implementation of the proposed action. If the Army decides to implement the proposed action, gates on the PTA trail will be coordinated with the property owner to prevent unauthorized use, reducing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

N41-5

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

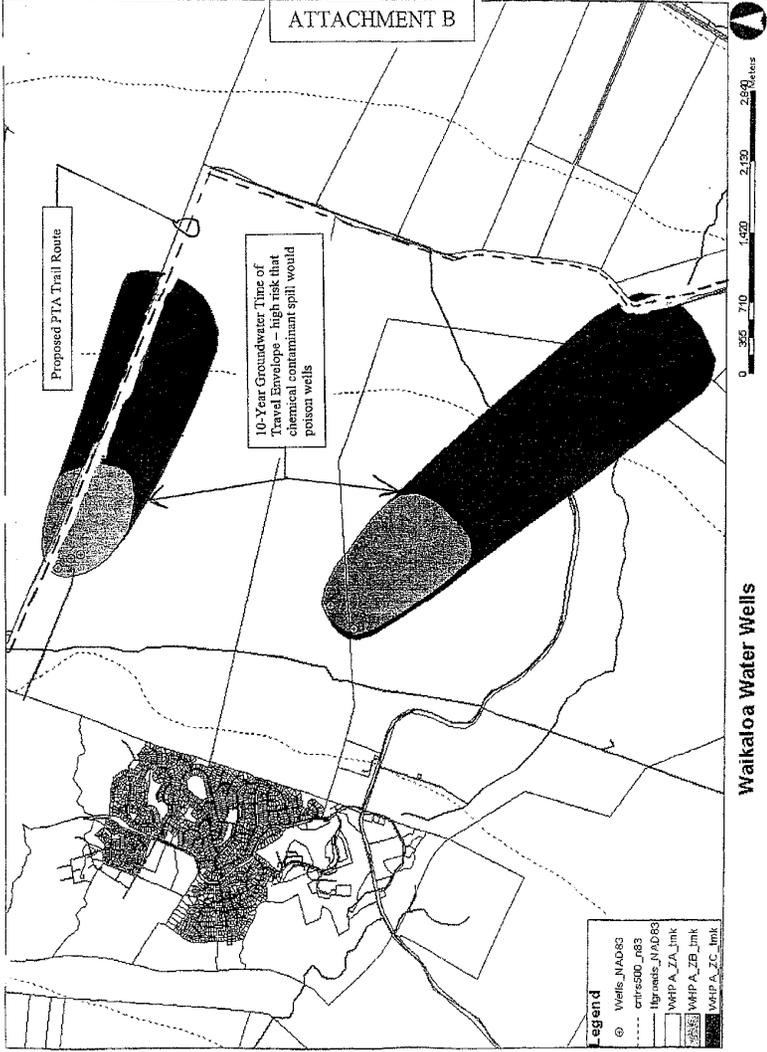
Responses



8-23

Responses

Comments



Comments

Letter N42

-----Original Message-----
 From: Miura, Beth S POH
 Sent: Thursday, October 02, 2003 4:43 PM
 To: Shirakata, Gary N POH; Barger, Cindy S POH
 Cc: Miyamoto, Tyler B POH; Tran, Uyen POH
 Subject: FW: JWT EA - statements in SBCT EIS

Gary and Cindy -- The second sentence is erroneous as identified by WCP.

Cindy - change can be made for the FEIS (plus the project may be completed by then so this section would be revised with new information).

Gary - TT needs to revise the cumulative impacts in the MMR DEIS (believe it mirrored SBCT).

Beth

-----Original Message-----
 From: WCP, Inc. [mailto:wcp@lava.net]
 Sent: Wednesday, October 01, 2003 2:51 PM
 To: Miura, Beth S; Grant, David M
 Subject: JWT EA - statements in SBCT EIS

Hi Beth/Dave:

I noticed that the Draft EIS for SBCT, Chapter 9.0 Cumulative Impacts page 9-11 includes the following statement pertaining to the JWT project:

Waikane Valley Training-Waikane/Kane'ohe (Project 20)
 The US Marines are planning jungle warfare training for up to 100 troops in the Waikane Valley near Kane'ohe. The Marines have recently purchased 187 acres (76 hectares) of land for this training and have fenced it off for training. An EA is being prepared, and training will begin upon completion of environmental review (Honolulu Advertiser 2002).

N42-1

The second sentence of the project description caught my attention for obvious reasons.

Responses

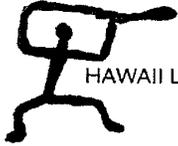
N42-1

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
N43



HAWAII LEEWARD PLANNING CONFERENCE
P.O. BOX 2159 • KAMUELA, HAWAII 96743-2159

AN 01

December 4, 2003

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

RE: DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS),
TRANSFORMATION OF THE 2ND BRIGADE, 25TH INFANTRY DIVISION (L)
TO A STRYKER BRIGADE COMBAT TEAM IN HAWAII

Dear Sir or Madam:

We are writing in support of the proposed expansion of the U.S. Army in Hawaii by locating one of their Interim Brigade Combat Teams (IBCT) within the State.

Our comments are directly~ chiefly at the proposed expansion and impacts on the Big Island.

N43-1

- Kawaihae Harbor – we appreciate the sensitivity shown for the multi-use aspects of the harbor and applaud efforts made to work with the community for continued shared use of the area.
- Upgrades to the tank trail from Kawaihae to PTA – we strongly support this effort, which will positively mitigate the impact of military traffic on public roads.
- Upgrades to Bradshaw AAF – these improvements will both enhance the mission capability and overall air-vs-land transportation options.
- Additional range complexes – these multi-use ranges are proposed to reduce costs, maintenance and impacts to the environment as well as facilitate multiple tasks over a smaller area – all of which we support.
- Land purchases adjacent to PTA – we support in concept to enhance training capabilities and know that you will work with neighboring communities, particularly Waiki'i Ranch, to mitigate impacts, especially dust and noise concerns.

N43-1

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

**N43-1
cont'd**

In closing, we want to state that we strongly support the mission and presence of the U.S. Army on Hawaii Island. We applaud your sensitivity to local concerns and pro-active management of the land. Your commitment to environmental and cultural stewardship is exemplary. As an organization, we look forward to working with you in the future to make our Island and State a better place to live and work.

Thank you for the opportunity to comment.

Regards,



John B. Ray
President
Hawaii Leeward Planning Conference

Comments

Responses

Letter
N44



MILILANI/WAIPIO/MELEMANU NEIGHBORHOOD BOARD NO. 25

c/o NEIGHBORHOOD COMMISSION • CITY HALL, ROOM 400 • HONOLULU, HAWAII 96813

**RESOLUTION CONCERNING THE U.S. ARMY DRAFT ENVIRONMENTAL
IMPACT STATEMENT FOR CONVERTING THE 2ND BRIGADE, 25TH
INFANTRY INTO A STRYKER BRIGADE**

WHEREAS, Neighborhood Board #25 finds that pursuant to the National Environmental Policy Act of 1969, the Department of the Army has prepared a programmatic environmental impact statement (PEIS) to evaluate the potential environmental and socioeconomic effects associated with transformation of the 2nd Brigade, 25th Infantry Division (Light) (ID (L)) in Hawaii into a Stryker Brigade. Twenty-eight projects are proposed for the U.S. Army Hawaii that would provide support structure, facilities, and necessary field training required for a Stryker Brigade Combat Team (SBCT).

WHEREAS, Neighborhood Board #25 fully supports the concept of positioning a Stryker Brigade at Schofield Barracks and appreciates the benefits that such an action would have on Honolulu's economy in general and Central Oahu in particular. However, the PEIS identifies numerous impacts that the Stryker Brigade will have on this area's already over-strained infrastructure that must be addressed and mitigated; and

WHEREAS, Neighborhood Board #25 has placed a high priority on the quality of education in our community, and the Draft EIS - Transformation projects over 1,000 school age children will relocate into our school districts. Our elementary, middle, and high schools are already overpopulated and supporting infrastructure and resources cannot keep pace with the steadily increasing student population; and

WHEREAS, the introduction of over 400 Stryker tactical vehicles (each weighting over 20 tons), as described in the Draft EIS - Transformation, will have a significant impact on our community's already overburdened transportation infrastructure and deteriorating roadways; and

WHEREAS, the Transformation of the 2nd Brigade, 25th Infantry (Hawaii) into a Stryker Brigade will bring fixed wing aircraft (C-130 and C-17), UAV, and more helicopters activity to Wheeler Army Airfield and over the Millilani Mauka and Launani Valley areas,

WHEREAS, the U.S. Army proposes to purchase more local lands to accommodate the new Stryker tactical vehicle and its new technology to enhance SBCT training;

BE IT RESOLVED that Neighborhood Board #25 urges the Army to specifically address actions that it will take to mitigate the adverse effects the Stryker Brigade will have on the community's educational, transportation and real property infrastructure, and calls upon the Governor of the State of Hawaii, the Mayor of Honolulu, all members of the State Legislature and City Council Members to support the mitigation of our above stated concerns in order to ensure the quality of our community life for present and future generations.

N44-1

We thank you for your comment and participation in this public process. Your comment has been noted and has been included as part of the administrative record for this process. In accordance with NEPA regulations, the Army is conducting this EIS in order to identify the direct, indirect and cumulative environmental effects of the proposed action on the ROI. If the Army decides to implement the proposed action, the Army will mitigate all significant impacts in order to minimize the overall environmental impacts of the proposed action.

N44-1



Oahu's Neighborhood Board System-Established 1973

Comments

Responses

May 2004

Stryker Brigade Combat Team Final EIS, Hawaii

P-360

N44-2 **BE IT FURTHER RESOLVED** that Neighborhood Board # 25 urges the U.S. Army to cooperate with the State of Hawaii in providing sufficient resources to plan, design, and construct more classroom space and hire more teachers to accommodate the projected increase in student population before arrival of the military families mentioned in the Draft EIS – Transformation.

N44-3 **BE IT FURTHER RESOLVED** that Neighborhood Board No. 25 urges the U.S. Army to cooperate with the State of Hawaii and City and County of Honolulu in providing sufficient resources to help State/City/County of Honolulu strengthen, widen, and provide continued maintenance of those public thoroughfares that the Stryker tactical vehicles will frequently convoy and impact during training and/or deployment.

N44-4 **BE IT FURTHER RESOLVED** that Neighborhood Board No. 25 urges the U.S. Army to coordinate the introduction of Stryker Brigade support aircraft with the Federal Aviation Administration to ensure existing airspace management procedures over the Central O'ahu Region are safe and consistent with proposed transformation use and to coordinate with State/City/Country Police, Fire, Civil Defense Agencies to ensure the availability of adequate emergency services in the event of aircraft mishap in Mililani residential community areas.

N44-5 **BE IT FURTHER RESOLVED** that Neighborhood Board No. 25 urges the U.S. Army to work with the State Department of Land and Natural Resources to ensure compliance with environmental laws concerning Hawaiian cultural sites and the protection of rare/endangered Hawaiian unique species and to develop and have ready plans and programs to restore island training sites to their original conditions (prior to Transformation) once these training sites are declared no longer needed.

BE IT FINALLY RESOLVED that copies of this Resolution be transmitted to Hawaii's Congressional Delegation; the Transformation Office, US Army Garrison, Hawaii; Governor Linda Lingle; Mayor Jeremy Harris; the Speaker of House; the Senate President; Senator Cal Kawamoto; Senator Ron Menor; Representatives Marilyn Lee and Guy Ontai; Members of the State Legislature finance committees; Members of the City Council; the Managing Director of the City & County of Honolulu; the County Departments of Environmental Services and Planning & Permitting; the Department and Superintendent of Education; the State and County Directors of the Departments of Transportation; the Chairs of the House and Senate Education, Health, and Economic Development Committees; the State Departments of Defense, Land and Natural Resources, and Business Economic Development & Tourism; the State Office of Planning; the State Land Use Commission; the Board of Water Supply; the Oahu Resource Conservation and Development Council; the Hawaii Director of the FAA; the Leeward Oahu Transportation Management Association; the Honolulu Fire Department; the Honolulu Police Department; the Oahu Civil Defense Agency; and all Neighborhood Board Chairs.

ADOPTED by Neighborhood Board No. 25 at its regular meeting of November 26, 2003, by unanimous vote (22-0-0).


Richard G. Poirier, Chair

N44-2

The Residential Communities Initiative (RCI) Office, as the lead department for planning Army Family Housing, closely coordinates future student requirements with the State Department of Education. To this end, Keith Nishioka, RCI Project Manager, has been working with DOE District Superintendents Gary Griffiths and Betty Mow. On behalf of the Army, he works with Keith Kameoka from the DOE, to generate School Enrollment Projections with as much accuracy as possible. The Development Partnership plans its demolition/reconstruction/renovation/reallocations years in advance, coordinating with the DOE. In turn, the DOE understands that the Army communities must be advised one year in advance of any changes in school districting. Furthermore, the RCI also works with Heidi Meeker from the DOE's Planning Branch.

N44-3

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.

N44-4

The Army will comply with all FAA review requirements.

N44-5

Thank you for your comment and your participation in the public process. Your comment has been noted and has been included in the administrative record for this process. The Army is following all appropriate laws and regulations in the consideration of the Proposed Action.

Comments

Responses

Letter
N45



A

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
 Fort Shafter, Hawaii 96858-5440

RE: Public Hearing Testimony
 November 5, 2003, Waikoloa Beach Marriott Resort
 Draft Environmental Impact Statement
 Transformation of the 2nd Brigade 25th Infantry Division (L)
 To a Stryker Brigade Combat Team in Hawaii

Dear Ms. Barger:

Thank you for providing Parker Ranch with a copy of the Draft Environmental Impact Statement (DEIS) for the Army Transformation to a Stryker Brigade Combat Team in Hawaii, dated October 2003. We appreciate the opportunity to provide you with our comments on this draft EIS.

It is our understanding that the proposed Stryker Brigade Combat Team (SBCT) Transformation requires a change in training protocol, as well as an increase in training area to support the transformation of the 2nd Brigade of the Army's 25th Infantry Division. Therefore, the West PTA Acquisition Area (WPAA) is a critical component of the Army's transformation process.

These lands are owned by Parker Land Trust which is a subsidiary of the Parker Ranch Foundation Trust. The Parker Ranch Foundation Trust was created by Richard Smart in 1992 exclusively for health care, education and charitable purposes within the Waimea Community. Beneficiaries of the Trust are North Hawaii Community Hospital, Parker School, Hawaii Preparatory Academy and Hawaii Community Foundation. The assets of the Trust include Parker Ranch land holdings in Hamakua, South Kohala and North Kohala, as well as residential and commercial zoned lands within the village of Waimea.

This responsibility to the beneficiaries of the Parker Ranch Foundation Trust require that the Ranch consider all reasonable options to provide additional income and/or resources to support these programs. It is from this perspective that we are reviewing the SCBT draft EIS, including the possible acquisition of all or a portion of the 23,000 acre Keamuku lands.

67-1435 Mamalahoa Hwy. • Kamuela, Hawaii 96743
 Telephone: (808) 885-7311 • Facsimile: (808) 885-5602
 www.parkerranch.com

Comments

Responses

Ms. Cindy Barger
January 2, 2004
Page 2

As you are aware, Parker Ranch, through its former owner, Richard Smart, has welcomed military training activities on its lands. Over 90,000 acres of land, including the Keamuku Tract were used by the Armed Services during World War II and much of our lands are still used for training activities today. We have been and continue to be strong supporters of the military.

N45-1

At the same time, much of the lands that have historically been used by the military have been adversely impacted by the past training activities, especially related to unexploded ordinance. While we appreciate the Army's efforts to clean up these areas, as Trustees, we must proceed with caution in considering expanded training activities and how they may impact Parker Ranch lands.

N45-2

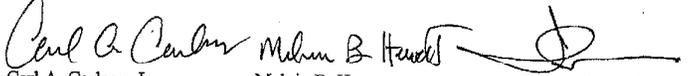
We clearly understand the importance of the Army to undertake a transformation process to meet the needs of a changing environment. In this regard, Parker Ranch has been supportive of the EIS process to identify and assess potential community, cultural, stewardship and environmental impacts resulting from the transformation process with an emphasis on the Keamuku Lands (WPAA). At the same time, we want to be clear that the inclusion of these lands in the EIS review process does not in any way obligate Parker Ranch to sell or lease this area to the Army for training purposes.

The information provided through the EIS process will be used by the Army and Parker Ranch to determine if these lands are appropriate for training and under what conditions. We are open to discussing a potential acquisition of some or all of these lands, provided that such an acquisition would be consistent with good land stewardship and benefit the Parker Ranch Foundation Trust, its beneficiaries and the greater Waimea Community.

We look forward to the completion of the EIS process and a continuing working relationship with the Army in Hawaii. Please call us if you have any questions on this matter.

Sincerely,

PARKER RANCH FOUNDATION TRUST


Carl A. Carlson, Jr. Melvin B. Hewett Thomas P. Whittemore
Trustee Trustee Trustee

/emtt
c: William L. Moore

N45-1

We share and understand your concern on this issue. Our soldiers and their families live and work on our installations. This issue has the highest level of attention at the Department of Army and it is addressed by a centrally managed program that involves the identification, investigation, evaluation, and, if needed, remediation of potential sites. This program, called the Installation Restoration Program, is coordinated with the state and the US EPA to insure compliance with all laws and regulations. The Army is committed to cleaning up existing sites in accordance with applicable laws and regulations.

N45-2

The Army understands that inclusion of the possible acquisition of lands that may be owned by Parker Ranch as part of the proposed project does not obligate Parker Ranch to sell or lease these areas to the Army for training.

Comments

Responses

Letter
N46



Living Being In The Legislative - Court - Executory Functions

Order

Action Response To From and To
Living Being In The Human Personality - Planetary Functions

"As If - As Though Becomes - Merge In"

N46-1

"CORPORATION - UNITED STATES - UNITED STATES
OF AMERICA" - "DEPARTMENT OF THE ARMY"

As In

"Draft Environmental Impact Statement"

And The

"Programmatic Agreement (PA)"

"Transformation of the 2nd Brigade,
25th Infantry Division (L) to a Stryker
Brigade Combat Team in Hawai'i"

Received by

Volumes - 1, 2, 3

N46-1

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

Comments

Responses

Letter
N47



Received 12/1/03

December 1, 2003

Colonel David L. Anderson
Commander, US Army Garrison
Fernandez Hall
Schofield Barracks, Hawaii 96857

Dear Colonel Anderson:

On behalf of the Wahiawa Community and Business Association, we wish to express our support for the transformation of the 2nd Brigade, 25th Infantry Division (L) into a Stryker Brigade Combat Team in Hawaii.

Our organization represents the people and businesses of the Wahiawa area. We believe that the proposed transformation of the 2nd Brigade is a valid strategic initiative of the Army. As the community in closest proximity to Schofield Barracks, we recognize that the transformation will have some new and potentially adverse impacts on the people living in this area. However, we believe that the Army will mitigate these effects to the extent feasible. Moreover, we believe that the benefits to our national security from the transformation will significantly outweigh potential negative impacts.

The community of Wahiawa is a patriotic community that has lived side-by-side with our Army neighbors for many years. The relationship between our community and the Army has always been marked by mutual respect, friendship, and support. We endorse the transformation of the 2nd Brigade into a Stryker unit, because we believe it will be good for the Army, our nation's security, and our community.

We are forwarding copies of this letter to our congressional delegation to make them aware of our position on this issue.

Sincerely,

Jack D. Smith
President

Daniel S. Nakasone
Vice-President

N47-1

N47-1

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

Wahiawa Community & Business Association, Inc.
P.O. Box 861408, Wahiawa, Hawaii 96786
Phone: (808) 621-6531

Comments

Responses

Letter
N48

HAWAII MOTORSPORTS ASSOCIATION INC;
P.O. BOX 1654
HONOLULU, HAWAII 96806

TO: THE U.S. ARMY , SCHOFIELD HAWAII
FROM: MEL HO'OMANAWANUI PRESIDENT
DATE: JANUARY 27,2004
RE: STRYKER BRIGADE

ALOHA,

The HAWAII MOTORSPORTS ASSOCIATION INC; have a few concerns allowing the STRYKER BRIGADE activity into the K-A1 TRAINING AREA. As you already know that the ASSOCIATION is in a Quasi lease with the STATE OF HAWAII you the U.S. ARMY. In the past weve always had a very good relationship even to this present day and hope to continue with what we already have thank you.

The concerns are:

N48-1

1- will the entrance from drum road to the KAHUKU TRAINING AREA have a 24/7 personnel physically manning the gate. As it is now the K-A1 and Charlie gates are the main entrances to the area.

N48-2

2- we realize that you have purchased the lands for TRAINING except K-A1 area in which we use on weekends and FEDERAL HOLIDAYS and would like it to remain a NO LIVE AMMUNITIONS AREA for the safety of our members.

In regards to our first concern we are trying to limit the access of renegades who tresspass on GOVERNMENT lands whether it is motorcycles, mountain bikes, skate-boarders, pig hunters, the general public etc; etc; on week-days and possibly the week-ends to get to the K-A1 AREA.

The HAWAII MOTORSPORTS ASSOCIATION WILL NOT SUPPORT THE STRYKER BRIGADE if our CONCERNS are not addressed.

YOURS TRULY
Mel Ho'omanawanui
MEL HO'OMANAWANUI
PRESIDENT H.M.A. INC;

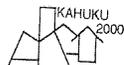
N48-1

The Army does not expect that there will be any changes to the guard schedule at the K-A1 and Charlie Gates.

N48-2

The Army does not expect that there will be any change in access to area K-A1 or other areas at the Kahuku Training Ares except during active live-fire training at the CACTF.

Comments



56-134 Pualalea Street
 Kahuku, Hawaii 96731
 808-293-8811

Letter
 N49

October 30, 2003

C/o 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, HI 96858-5440
 Telephone (808) 438-4812
 Facsimile: (808) 438-7801
 E-mail: SBCT_EIS@poh01.usace.army.mil

Dear Sir or Madam:

My name is Mr. Ralph K. Makaiau Jr., born and raised in Kahuku Village, board member Kahuku 2000 (economic non-profit), Kahuku Education Alliance Corporation (education non-profit), Kahuku Community Association, Kahuku Hospital, Malama Ohana (Ko'olau Loa communities), Empower O'ahu - Ko'olau Loa Region, (island wide economic non-profit). I am participating as a community champion for Kahuku Village Regional Flooding Mitigation Project and Kahuku Village Association Phase IV Affordable Housing Project.

I did make a statement in your previous public hearing at the Kahuku High and Intermediate Schools cafeteria and I would like to again state that I am in support of furthering training for America's fighting men and women.

I would like to share comment on the "Kahuku Training Area" (KTA) as follows:

Surrounding Land Use

- Considering best practices as an "ahupua'a" (mauka to makai), Table 7-5, 7-6, 7-12 resulting offsite impacts are erosion, drainage, flooding, and water quality. Community networking is strongly concerned about:
 - Environmental - clarity of Kawela Bay waters, Turtle Bay, Kuilima Cove, Kuilima Bay, Bakahan Ocean Outlet, Ki'i Ocean Outlet, Malaekahana Ocean Outlet, Punaho'olapa Wetland, Punamano Wetland, and Ki'i Wetland.
 - Environmental - erosion derived from Stryker exercises is assumed to cause substantial elevation in watershed contamination.
 - Economic - existing business viability with perceived increased flooding.
 - Economic - reasonable new investor cost improvement to land with mountain runoff and flooding impact on Turtle Bay Resort.
 - Cultural - scenic mauka sightlines of rural Hawaii throughout Kamehameha Highway from Ko'olau Loa to North Shore.
 - Housing - elevated cost of affordable housing because land use changes causes fear of further area flooding existing and future.

N49-1

Responses

N49-1

Chapter 7 - Kahuku Training Area in the final EIS discusses the impacts of the proposed project on the resources of the area. The Army has determined that the only significant impacts at KTA are impacts to recreation access at the CACTF facility, soil loss from training activities, impacts to sensitive species and sensitive habitat due to wildfire, and impacts to historic buildings. The Army has determined that there would be no significant impacts on marine resources, local economy, cultural resources, view, housing, education, or transportation as discussed in Chapter 7.

Comments

Responses

N49-1
cont'd

- o Education – unimproved Kahuku Schools facilities because of mountain run-off and no accommodation for drainage.
- o Transportation – reduce military use of Kamehameha Highway to KTA.
- o Transportation – “Drum Road” to be paved and available to civilian circle island traffic under emergency extended road closure of Kamehameha Highway. This includes passage under tsunami and hurricane grid lockdowns.

N49-2

Summary: Stryker and EIS process to participate directly in mitigating current Kahuku shoreline flooding. KTA is now the majority land user and must ensure offsite sustainability of local economy and life styles. Ko’olau Loa/North Shore regions may be flooding zones, however they are flood zones created by onsite and offsite owner land user. It is essential that the origins of our source of runoff be accountable to not adding to an already depressed economy and actively participating in mitigating existing conditions.

Archaeological Sensitivity Zones at Kahuku Training Area

- Cultural - will the public have access to sites identified?

N49-3

Ko’olau Loa and North Shore Communities are “depressed” communities. Ko’olau Loa and North Shore Communities want to remain “rural” communities. We do not have the resources to correct the community’s infrastructure without sacrificing our life style to urban sprawl. As Stryker needs our jungle/mountain terrain, Oahu’s economy also needs to showcase its last surviving jungle/mountain terrain communities. Can and will you help our communities?

Respectfully submitted,

Ralph K. Makaiau Jr.
Vice President, Kahuku 2000

cc. Office of Senator Daniel Inouye, U. S. Senate

N49-2

Section 7.8 - Water Resource, describes the impacts of the project on flooding. The Army has determined that there will be less than significant impacts to increased flood potential due to flooding. Construction of an all weather Drum road will reduce sediment load to surface waters which would have a beneficial effect on flooding.

N49-3

As discussed in Section 4.10, the Army proposes to continue work with Native Hawaiian communities on access to cultural sites and areas of traditional importance. In addition, an installation wide access protocol is being developed for all Army training lands in Hawaii.